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VICE PRESIDENT  
DESIGN ENGINEERING

DOCKET NUMBER PR - 9(44FR 22746) <sup>(29)</sup>  
PROPOSED RULE



June 27, 1979

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Services Branch

Subject: 10CFR Proposed Rules  
Comments  
File: EGS A-5.1

In response to paragraph 5 in the "Request for Comments" section of 44FR22747, Duke Power submits the following comment:

It appears that 10CFR73.55 falls into the category of regulations which are difficult to understand. There are approximately fifty other documents for guidance on the subject of protection against industrial sabotage, either published or sponsored by the NRC. It is recommended that the NRC staff review these documents to determine whether a single and concise document could be used to supercede the volumes presently on file.

A list of the guidance documents referred to is enclosed for reference.

Very truly yours,

L. C. Dail

Acknowledged by card... *[Handwritten initials]*

JDW/sr

Attachment

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	<u>Document #</u>	<u>Document Name</u>	<u>Date</u>
1.0	<u>Regulations</u>		
1.1	10CFR 73.55	Requirements for the Physical Protection of Nuclear Power Reactors	2/24/77 & revisions
1.2	10CFR 73.XX	Other requirements and definitions included by 10CFR 73.55	Various
1.3	10CFR50.54 (p)	Requirements for Security Plan Changes	
1.4	10CFR50.34 (b.8.c)	Requirements for Submittal of a Security Plan	

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<u>Document #</u>	<u>Document Name</u>	<u>Date</u>
3.0	<u>Regulatory Guidance</u>	
3.1	NUREG-0144 (SAND 76-0637)	Summary Report of Workshop on Sabotage Protection in Nuclear Power Plant Design 2/77
3.2	NUREG-0178	Basic Considerations for Assembling a Closed Circuit Television System 5/77
3.3	NUREG/CR-0181	Barrier Penetration Database 7/78
3.4	NUREG-0184	User's Guide for Evaluating Physical Security Capabilities by the EASI Method 6/77
3.5	NUREG-0207	Interim Format and Content for a Physical Security Plan for Nuclear Power Plants 2/77
3.6	NUREG-0219	Nuclear Security Personnel for Power Plants, Content and Review Procedures for a Security Training and Qualification Program 7/78
3.7	NUREG-0220	Interim Acceptance Criteria for a Physical Security Plan for Nuclear Power Plants 3/77
3.8	NUREG-0273	Guide for the Evaluation of Physical Protection Equipment 6/77
3.9	NUREG-0320	Interior Intrusion Alarm Systems 2/78
3.10	NUREG-0464	Site Security Personnel Training Manual 10/78
3.11	NUREG-0465	Transportation Security Personnel Training Manual 11/78
3.12	NUREG/CR-0508	Security Communications Systems for Nuclear Fixed Site Facilities 10/78
3.13	-----	Staff Review Guidelines 1-20 11/77 - 4/78
3.14	-----	Security Plan Evaluation Report Workbook 1/78
3.15	IE Circular 77-04	Inadequate Lock Assemblies 3/77
3.16	IE Circular 78-17	Inadequate Guard Training/Qualification and Falsified Training Records 10/78
3.17	UL-752	Bullet Resisting Equipment 2/74
	<i>IE Circular 79-12</i>	<i>Re VETPCO New Fuel Sabotage 5/79</i>

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<u>Document #</u>	<u>Document Name</u>	<u>Date</u>
2.0	<u>Reg Guides</u>	
2.1	Reg Guide 1.17 Protection of Nuclear Power Plants Against Industrial Sabotage	6/73
2.2	Reg Guide 5.7 Control of Personnel Access to Protected Areas, Vital Areas, and Material Access Areas	6/73
2.3	Reg Guide 5.12 General Use of Locks in the Protection and Control of Facilities and Special Nuclear Materials	11/73
2.4	Reg Guide 5.27 Special Nuclear Material Doorway Monitors	6/74
2.5	Reg Guide 5.44 Perimeter Intrusion Alarm Systems	6/76
2.6	Reg Guide 5.54 Standard Format and Content of Safeguards Contingency Plans	3/78
2.7	Reg Guide 5.20 Training, Equipping and Qualifying of Guards and Watchmen	1/74
8	Reg Guide 5.43 Plant Security Force Duties	1/75

<u>Document #</u>	<u>Document Name</u>	<u>Date</u>
3.18 W-A-004508	Interim Federal Specification: Alarm Systems, Interior, Security, Components, for (GSA-FFS)	2/73
3.19 ANSI N18.17	Industrial Security for Nuclear Power Plants	1973
3.20 NUREG 75/087	Standard Review Plan-Industrial Security	11/75

<u>Document #</u>	<u>Document Name</u>	<u>Date</u>
4.0	<u>Other NRC Issued Publications</u>	
4.1	SAND 75-0504 Safety and Security of Nuclear Power Reactors to Acts of Sabotage	3/76
4.2	SAND 76-0428 Safeguards System Effectiveness Modeling	9/76
4.3	SAND 76-0554 Intrusion Detection Systems Handbook	
4.4	SAND 77-0043 Insider Safeguards Effectiveness Model (ISEM) Users Guide	11/77
4.5	SAND 77-0116C Protection of Nuclear Power Plants Against Sabotage	10/77
4.6	SAND 77-0644 Reactor Safeguards System Assessment and Design	6/78
4.7	SAND 77-0777 Barrier Technology Handbook	4/78
4.8	SAND 77-1033 Entry-Control Systems Handbook	9/77
4.9	SAND 77-1367 User's Guide for Evaluating Alternative Fixed Site Physical Protection Systems Using "FESEM"	11/77
4.10	----- EASI Model FORTRAN Listing	1/77
4.11	----- NEWMOD: A New TSO Physical Protection Assessment Model	1977
4.12	----- NEWMOD Version FORTRAN Listing of TSO	1977
4.13	----- Considerations for Barrier Design and Placement	6/77
4.14	GAI-77-868-LJ Protection of Nuclear Power Plants Against Sabotage by An Insider	5/78
4.15	HCP/D6540-01 Nuclear Safeguards Technology Handbook	12/77
4.16	HCP/D0789-01 A Systematic Approach to the Conceptual Design of Physical Protection Systems for Nuclear Facilities	5/78
4.17	NILECJ-STD-0601-00 Walk Through Metal Detectors for Use in Weapon Detection	6/74