SG 910-4

EBASCO SERVICES

INCORPORATED

UTILITY CONSULTANTS - ENGINEERS - CONSTRUCTORS

TWO RECTOR STREET NEW YORK, N.Y. 10006

CABLE ADDRESS EBASCOE"

COCKET NUMBER

EROPOSED RULE

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

Attention: Docketing and Service Section

Subject: Regulatory Guide 5.14, Rev 1, May 1979, For Comment

"Use of Observation (Visual Surveillance) Techniques

In Material Access Areas"

Gentlemen:

Ebasco Services has reviewed the subject regulatory guide and would like to offer the following comment:

Section B.5

In considering the use of CCTV as a satisfactory substitute for the two-man rule it should be noted that its use is site and application dependent. In addition, the last sentence of this section should be revised as follows: "However, in this application the use of CCTV..."

Ebasco appreciates having had the opportunity to comment on this guide and would welcome the opportunity to participate in future discussions.

Very truly yours,

SP Oxornell

August 20, 1979

E P O'Donnell Chief Engineer

Nuclear Licensing

EPO:JSP:kc

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Acknowledged by card .. 8/3/....