

EBASCO SERVICES

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PROPOSED RULE *PR - Misc. Notice
Reg. Guide*

August 20, 1979



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

Attention: Docketing and Service Section

Subject: Regulatory Guide 5.7, Rev 1, May 1979, For Comment.

Gentlemen:

Ebasco Services has reviewed the subject regulatory guide and has the following comments:

Position

Section B

In the first paragraph the use of "2. Entry to control point" is redundant.

In the second paragraph the verification by "determining something about an individual" is too vague. Instead, Ebasco recommends: "...by observing some personal and unalterable feature(s) of an..."

Also, in the second paragraph the last sentence is not correct since a badge reader cannot perform the first method of verification.

In addition to the definitions listed in end of Section B, the term "Two-Man Concept" should be included.

Section C.1.a

The comparing of an "image of a picture badge" to that of an individual's face is too vulnerable to spoofing by altering the badge. The "stored image" method is equally practical and definitely more secure.

Section C.1.b

As used in this section and elsewhere, there is no such device as a "firearms detector". The correct term should be "a metal detector" that is sensitive to a specific mass of nonferrous metal.

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Acknowledged by card. *5/31*.....

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The term "incendiary device" should be defined. Also there is no known "search equipment" that can "indicate the presence" of an "incendiary device".

Section C.1.b.4 In addition to granting access by "the opening of the PA", an individual must also be required to "...observe and control the search procedure..."

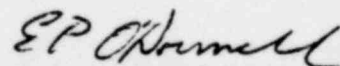
The phrase "...to have this opening controlled by the control alarm station (CAS) or secondary alarm station (SAS) operator or both." is contrary to the current and established (by implication of various NUREGS) NRC philosophy. The CAS and SAS must be free to perform their system supervisory function. They must not be required or permitted to become actively involved in the single security function of access control.

Section C.1.d.3 Ebasco recommends the addition of: "One of the two members of the security organization may be in a remote observation area away from the unloading area if he can adequately observe the procedure by means of CCTV."

Section C.1.e The Regulatory Guide should identify the mass of non-ferrous metal that is to be detected, not one of four weapons. In its current form, one of the four weapons must be used to demonstrate compliance. No "device" can "discriminate between typical firearm and non-firearm masses of metal."

Ebasco hopes our comments will be considered carefully and would welcome the opportunity to participate in any discussion with the NRC on this proposed guide.

Very truly yours,



E P O'Donnell
Chief Engineer
Nuclear Licensing

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