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

Attention: Docketing and Service Branch

Gentlemen:

Subject: Fixed Site Physical Protection Upgrade Rule Guidance  
Compendium - Volumes I and II, Draft

In response to the invitation for public comments that was a part of the Draft Fixed Site Physical Protection Upgrade Rule Guidance Compendium, the Westinghouse Electric Corporation offers the following comments.

The comments contained herein are specifically related to Part I, Standard Format and Content Guide which was suggested by the NRC for use in preparing fixed site physical security plans in response to the "Safeguards Upgrade Rule." The other parts of this compendium were considered to be informative and available for future reference during the planning and design phases.

Generally, the information required by this guide for a physical security plan is excessive relative to committing specific actions and providing procedural details. Each section designated to detail a particular security subsystem, e.g., alarm stations, requires identification of procedures and actions. The specification of actions and procedures in the security plan implies commitments which will later restrict the capability of change without approval through the NRC licensing branch. Previous Westinghouse experience indicates that more effective actions and procedures are developed after a system has been designed and a plan approved. While procedures are subject to change for various reasons the type of change does not affect the overall performance of the plan. Therefore, the physical security plan should not be designed to include specific procedures and actions. The same general comment applies to the detail specified on the "Information Request Sheets" for security equipment subsystems. Much of the detail outlined on these sheets is procedural relative to operation rather than specific as to what type of equipment will be used and its function. The purpose of the Information Request Sheets should be a commitment to the type of equipment that will be installed.

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Acknowledged by card.....

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Specific Comments:

Pages 26 and 27, Sections 14.0, 15.0, and 17.0

Indicate "general" or "generic discussions" are required in these subject areas.

Comment: It would seem more appropriate if the Commission defined in technical terms what detail is required.

Page 29, Part II

"Equipment descriptions should include manufacturer and model."

Comment: Manufacturer and model information should not be required, since various manufacturers can supply equipment capable of meeting the performance requirement. It may be necessary to substitute equipment without reducing overall effectiveness.

- Pages 21-36, 18.1.1 Describe the development of entry authorization procedures
- 18.1.2.1.1 Discuss the procedures ---
- 18.1.2.1.3 Describe the procedures ---
- 18.1.3 Describe the procedures ---
- 18.2.1 Identify the equipment and procedures ---
- 18.2.3 Describe the immediate actions ---
- 19.1.1 Discuss the development of criteria ---
- 19.1.2 Identify the equipment and procedures ---

Comment: These are a few examples that support the general comment relative to providing action and procedure detail. This type of information should not be required in a security plan, it is normally developed during the implementation period in compliance to security plan commitments.

Appendix I, Information Request Sheets (IRS)

Comment: The detail requested on the IRS is excessive. These sheets should be limited to the type of equipment and its function. Procedural and action information should not be required.

Attachment A, Sample Portion of a Security Plan (Part II, Ch. 18)

Comment: The voluminous detail provided in this sample is excessive and implies operations and equipment that may not be required to meet performance capabilities. For example, p. 18.10 implies "portals will have a pedestrian sally port" or the availability of redundant detectors for searching. The listing of drawing numbers, personnel categories, admittance schedules, and admittance categories are details that are developed as part of the operating procedures and should not be part of a security plan.

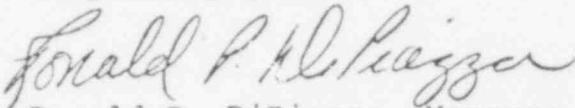
Attachment A, Sample Response to Component Information Request Sheet

Comment: It is not practical to require submittal of detailed operating procedures in a security plan as is suggested in this sample. As previously indicated, this detail can most effectively be developed during system installation.

Westinghouse appreciates this opportunity to comment on this draft compendium.

If you have any questions regarding this matter, please write me at the above address or telephone me on (412) 373-4652.

Very truly yours,



Ronald P. DiPiazza, Manager  
NES License Administration

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