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ROBERT J. MCWHORTER VICE PRESIDENT

ENCRET NUMBER PR-mise Protice
Reg. Linde

July 30, 1979

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

Attention: Docketing and Service Branch

Subject: Comments Pertaining to the Proposed Revision 2

to Regulatory Guide 5.44. Perimeter Intrusion

Alarm Systems

Gentlemen:

The following comments concerning the proposed Revision 2 to Regulatory Guide 5.44 are provided for your consideration:

Section A should specifically address the applicability of this document to Nuclear Powered Generating Stations.

The first paragraph on Page 3 should include acceptability of remote video observation during testing.

The system descriptions labeled 1 through 6 on Pages 4 through 11 would be more appropriate if included in another document. as they are not necessary to the Regulatory Guide.

The first paragraph at the top of Page 19 is not necessary to the Regulatory Guide and could be omitted.

If you have any questions, please contact me.

Very truly yours,

Roberty). me culato

Acknowledged by card. 8/10

RJM/RRO:vjd

cc: BMMiller