

October 26, 1973

Three Mile Island Nuclear Station, Unit 1

Docket No. 50-289

Supplemental Testimony on Industrial Security Program

by

C. Richard Van Niel

(Note: Additional testimony on this subject is being simultaneously submitted on a PROPRIETARY - IN CAMERA basis, the public disclosure of which would compromise the effectiveness of the Industrial Security Program.)

Contention 3. The facility must be so protected as to conform with the safety guides of the Atomic Energy Commission to avoid sabotage at the facility itself and for all transportation of fuel and waste products to and from the facility. It is contended that the applicant has not provided for sufficient watchmen and electronic surveillance, particularly with reference to transportation of the fuel and waste materials to and from the facility. (Emphasis added)

My testimony will be limited to the underlined portions of the contention above, the remainder to be provided by Robert F. Barker. The applicant has submitted, on the record, an Industrial Security Program, Revision 3, dated February 12, 1972. The applicant requested that the material contained in the document be treated in a proprietary manner. The review of the applicant's program began in February, 1972. The program was reviewed then against AEC Safety Guide 17, dated October 27, 1971. Revisions to the program were then prepared by the applicant and subsequently reviewed by the Regulatory Staff using this time as additional guidance, the newly available drafts of Proposed Standard ANS 3.3, Industrial Security for Nuclear Power Plants, prepared by

7910100

552

1411 180

the Subcommittee ANS-3 of the Standards Committee, American Nuclear Society. Our draft on this subject for the Safety Evaluation Report was prepared on February 20, 1973.

On June 22, 1973, the AEC issued Regulatory Guide 1.17, Protection of Nuclear Power Plants Against Industrial Sabotage. This guide states that the requirements and recommendations contained in ANSI Standard N18.17, Industrial Security for Nuclear Power Plants, dated March 23, 1973 (which is identical to draft 5 of ANS 3.3), provides an adequate basis for a physical security plan for the protection of nuclear power plants against industrial sabotage, supplemented by three additional recommendations: Security Systems, Equipment Testing, and Protection of Vital Equipment. Because the staff had already completed its review of the Industrial Security Program, the provisions of Regulatory Guide 1.17 were not applied. However, the Industrial Security Program for the entire Three Mile Island site will be reviewed for conformance with Regulatory Guide 1.17 in connection with the forthcoming license application for Unit 2 (Docket No. 50-320).

I have reviewed the details of the applicant's Industrial Security Program and determined that it conforms to AEC Safety Guide No. 17, "Protection Against Industrial Sabotage", dated October 27, 1971. I have concluded that the program is adequate and provides reasonable assurance that the risk associated with potential acts of sabotage that could lead to a significant threat to the public health and safety is acceptably low.

1411 181