

EBASCO SERVICES

INCORPORATED

UTILITY CONSULTANTS - ENGINEERS - CONSTRUCTORS

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Reg. Guide*

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,

E P O'Donnell

E P O'Donnell
Chief Engineer
Nuclear Licensing

EPO:JSP:kc

Acknowledged by card.. *8/31*.....

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