

# EBASCO SERVICES

INCORPORATED

UTILITY CONSULTANTS - ENGINEERS - CONSTRUCTORS

TWO RECTOR STREET

NEW YORK, N.Y. 10006

CABLE ADDRESS "EBASCOE"

January 7, 1980

PROJECT NUMBER

PROPOSED RULE

*PR-715c. Justice  
Reg. Guide*

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

*D-3*



Attention: Docketing and Service Branch

Subject: DRAFT REGULATORY GUIDE DIV 5 TASK S G 901-4  
"REPORTING OF SAFEGUARDS EVENTS"

Gentlemen:

Ebasco Services has reviewed the subject regulatory guide and would like to offer the following comments:

## Section B.1.a

What criteria should be used to determine whether a civil disturbance "could affect the licensee's ability to protect the facility". Any disturbance affects the ability to protect the facility and would therefore appear to require reporting. Is this the intent of the guide?

## Section B.1.b

It is questionable whether fires or explosions found to be a "part of a threat" should be classified as natural events since the intent appears to be the identification of circumstances which could be part of an overall plan to commit theft or sabotage.

## Appendix A

The requirement that the "number of similar components in use at Licensee's facilities", if a component fails, be supplied should be deleted. This information may be unobtainable within the one hour reporting time required in section C.

1925 318

## Draft Value Impact Statement

The NRC Staff perceives benefits because the NRC Staff will be in a position to evaluate threats earlier, participate earlier in responses, and identify problems elsewhere. Unless industry is given clear

Acknowledged by card. *[Signature]*

8002070 *329*

# EBASCO SERVICES

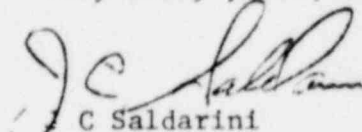
ENCLOSURE

indications as to what specific actions and responsibilities the NRC Staff intends to take in these areas, these requirements could work to cross purposes with the staff intent. One example would be equipment problems. The NRC Staff has indicated an intent to identify equipment problems to licensees elsewhere. This removes any industry impetus in this direction and would leave a vacuum should the NRC Staff not follow through. Another example would rest in NRC promise of participation in evaluating and responding to threats. A licensee notifying the NRC of civil disobedience would seem justified in not contacting the FBI since the guide has intimated a working relationship between NRC and the FBI. If FBI knowledge of the intentions of a group is necessary for proper evaluations then the NRC Staff has assumed a specific responsibility.

The above goes towards a single comment. The proposed requirements appear to require that the NRC Staff specifically identify their responsibilities in this area or the value of the proposed requirements is open to significant question.

Ebasco hopes our comment will be considered carefully and would welcome the opportunity to participate in any discussions the staff has on this draft regulatory guide.

Very truly yours,



J. C. Saldarini  
Manager  
Nuclear Licensing

JCS:SGP:kc

812 2591

1925 319