

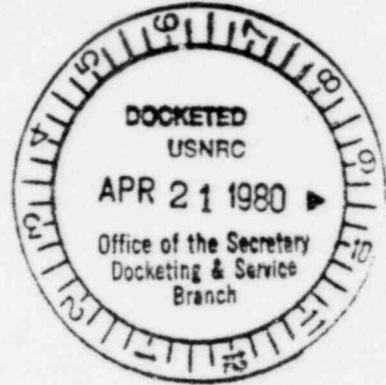
**SOUTH CAROLINA ELECTRIC & GAS COMPANY**

POST OFFICE BOX 764

COLUMBIA, S. C. 29218

April 14, 1980

DOCKET NUMBER  
PROPOSED RULE PR-73 ①  
(45 FR 15937)



Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
ATTN: Docketing and Service Branch  
Washington, D. C. 20555

Subject: Virgil C. Summer Nuclear Station  
Comments on Proposed Rule Change to  
10 CFR Part 73  
Nuclear Engineering File 2.8300

Dear Sir:

South Carolina Electric and Gas Company has reviewed the proposed rule change to 10CFR Part 73 presented in the Federal Register on 3/12/80 and desires to make the following comments.

1. 73.55(d)(7)(ii) refers to "types of vital areas". What does this mean? Is it (1) type 1 or type 2 areas, (2) areas defined by the nature of equipment or (3) areas defined by redundancy, such as, train A or train B?
2. Does 73.55(d)(7)(iv) mean that something more than identification of the key card at the door would be required. Examples could be fingerprint, voiceprint, keying in an assigned number on a keyboard, etc. Or does it mean that procedurally no one will have an individuals' key card except the authorized person?
3. 73.55(d)(7)(i) - Approval of access lists should be made by operations management personnel instead of by security personnel. Operations personnel are the only people qualified to determine when and who should have access to specific areas of the plant consistent with safety requirements and operational needs of the facility.

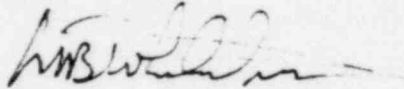
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Secretary of the Commission  
April 14, 1980  
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If you have any questions, please let us know.

Very truly yours,



M. B. Whitaker, Jr.  
Manager, Nuclear Licensing

MBW:rh

cc: E. H. Crews, Jr.  
H. T. Babb  
D. A. Nauman  
NPCF/Dixon  
File