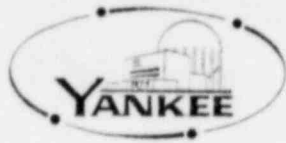


YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

DOCKET NUMBER
PROPOSED RULE PR-73 (5)
(45 FR 15937)

May 8, 1980



Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Access Controls to Nuclear Power Plant Vital Areas - Proposed Rule
(45 FR 15937 - 3/12/80)

Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the Nuclear Regulatory Commission's subject proposed rule. Yankee Atomic owns and operates a Nuclear Power generating plant in Rowe, Massachusetts. The Yankee Nuclear Services Division also provides engineering services for other nuclear power plants in the Northeast including Vermont Yankee, Maine Yankee and Seabrook 1 and 2.

We have the following comments on the proposed part 73.55(d)(7):

- Paragraph (i) could be interpreted as requiring the licensee to identify, in advance, the date and duration for each access to a vital area. If advance identification as to date and duration has to be made each and every time access to a vital area is required, the security system will become overwhelmed with non-productive paper work. Constantly updating and republishing access lists will become an unnecessary irritant to the plant staff and the main function of security personnel, rather than more important tasks directly related to a good security program. This paragraph should be revised so that it is understood that employees having a work related continual need to enter vital areas, to perform routine maintenance, inspection, or surveillance, may have this approved access.
- Paragraph (iv) establishes requirements to prevent "tailgating". This paragraph could be interpreted as a requirement for additional equipment. One positive way to assure prevention of tailgating would be through use of a turnstile or a security officer at each vital entry point. This is considered unsatisfactory from a safety, operational and

8005280777

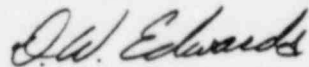
Acknowledged by card. 5/14/80...mdv...

economic point of view. Replacing the word "assure" with "obtain reasonable assurance" would be consistent with the intent.

If you have any questions regarding our comments, please feel free to contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



D. W. Edwards, Director .
Operating Projects

JHM/ncj