



DOCKET NUMBER **PR-73** (10)  
PROPOSED RULE  
**(45 FR 15937)**

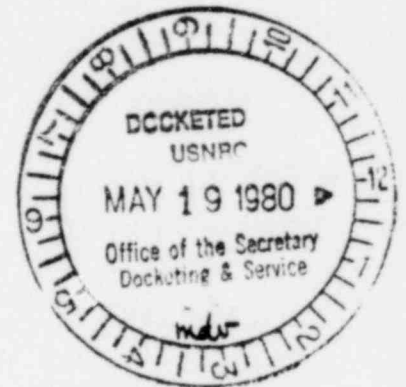
May 15, 1980  
L-80-154

Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Re: Proposed Rule -- Access Controls to Nuclear  
Power Plant Vital Areas



Florida Power & Light Company has reviewed the referenced rulemaking proposal and submits the following comments.

I. Section 73.55 (d) (7) (i) provides that "...access lists shall be reviewed, updated and reapproved at the end of each access duration period not to exceed 31 days."

The above language should be changed to require updates at the end of each "access authorization period not to exceed 31 days" instead of "access duration period." "Access duration period" could be interpreted as requiring updates whenever an individual's access is terminated (i.e., end of work day or completion of one of numerous assigned tasks) even if that individual is still authorized access to the vital area. Updates of this frequency are obviously beyond the intent of the commissions proposed rule and must be avoided by the suggested clarifying language.

II. Section 73.55 (d) (7) (ii) - "Each individual granted access to vital areas shall be issued a serially numbered badge that displays a visible code which indicates the level of access granted corresponding to the associated types of vital areas designated in the security plan."

The fact that vital area access shall be positively controlled precludes the need for serially numbered badges with authorization codes. If personnel must satisfy certain authorization requirements to gain access, there is no need for that person to wear a badge

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that indicates that he is authorized to be there. In other words, the criteria for authorization should be satisfied prior to entering the vital area, not after his presence in the area is discovered.

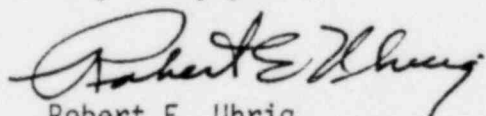
- III. Section 73.55 (d) (7) (iii) provides that emergency access lists shall be established and approved.

It should be emphasized in the rule that during emergencies the need to maintain strict security standards must be balanced against the need to respond expeditiously to the emergency. In this light, it requires no effort to see that emergency access lists must be broader and more flexible than lists used under less chaotic situations. At the very least, emergency access lists should permit access to necessary vital areas based on membership in a certain functional group (i.e., local law enforcement agency, fire department) rather than an individual clearance. In an emergency there may not be sufficient time to control access on an individual basis and deal professionally with the emergency.

In conclusion, the proposed rule will not enhance the physical security of nuclear facilities and could, in fact, prove to be counter-productive by concentrating too heavily on administrative gyrations rather than reasoned positive control over access.

Thank you for the opportunity to make these comments.

Very truly yours,



Robert E. Uhrig  
Vice President  
Advanced Systems & Technology

REU/JRP/ah