



LONG ISLAND LIGHTING COMPANY

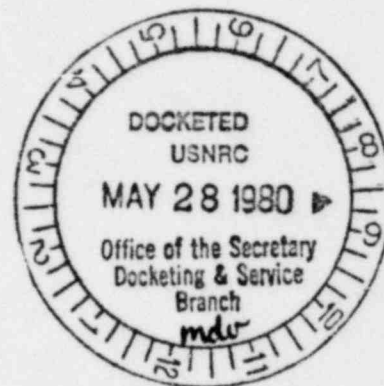
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DOCKET NUMBER
PROPOSED RULE PR-73 (12)
(45 FR 15937)

May 13, 1980

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



Reference: Proposed Amendments to 10CFR 73.55 (d)(7)

Dear Sir:

I wish to express this utility's objections to the proposed amendments to 73.55 (d)(7). The objections are based on our opinion that the amendments would not be effectual in their intended purpose, would be costly to implement, and would create both administrative and operational burdens not in the best interest of safe and efficient plant operations.

The thrust of the proposed amendments is to upgrade protection against threats posed by an internal adversary. Access controls may deter an unauthorized intruder from vital area access. However, the controls offer no protection against acts of sabotage by authorized persons when they are within a vital area. We cannot agree, therefore, that the solution to the potential threat lies in the establishment of further interior access barriers. Rather, it is our belief that the better safeguards lie in the areas of sound personnel screening practices, good management, and trustworthy employees.

The proposed amendment, section (IV) would require that the licensee assure through "procedures and/or equipment" that only authorized persons can access vital areas using a key or key card. To comply with both the letter and spirit of the proposed amendment would, we believe, require the use of CCTV or other positive identification device at each vital area portal. This would necessitate a very extensive and expensive retro-fit to the SNPS' security system. Further, based on the possibility of causing a LOCA, present security equipment and procedures in conjunction with operational safeguards provided by systems redundancy and monitoring, preclude the need for additional equipment or constraints to achieve a realistic degree of protection.

We suggest that the measures set forth in Review Guideline #6 (Dec. 1977), when combined with protected area entry, identification and card/card-key controls offer a sufficiently high degree of protection to vital areas.

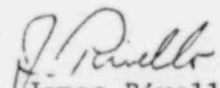
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Acknowledged by card. 5/28/80. mdu

Because of rotating shifts, hold-overs and call-ins, a computerized time control of an individual's vital area access is impractical except within very broad time-frames. Also, the routine inspection tours of operators are, from both an operational and safety aspect, not conducive to rigid time structuring for either protected area entry or duration of stay. The task of authorizing access and determining stay-times would therefore fall on the Watch Engineer, increasing his non-essential work loads. It should be noted that, like fossil fuel plants, nuclear facilities operate with comparatively small shift personnel complements. A fraction of this complement has, on a routine need basis, access to vital areas. However, as brought out above, the times for a given individual's vital area access will, of necessity, vary on daily, shift to shift basis. The Watch Engineer is at all times cognizant of the personnel under his direction, the routine and special work requiring vital area access and the status of plant systems and components. We are concerned that imposition of further vital area controls will place an additional administrative burden on the Watch Engineer and would distract from his prime responsibility for ensuring operational safety. Further, we are concerned that additional administrative and/or physical barriers to vital area entry could result in unacceptable delays in emergency situations.

LILCO respects and shares the NRC's concern for protecting nuclear plants against damage from insiders. We strongly believe that compliance with existing regulations and guidelines will, with a high degree of assurance, accomplish this. Also, we believe that further measures could, in their impact on workers be self defeating, difficult to implement and not in the best interest of plant safety.

Respectfully,


James Rivello
Plant Manager

RFR/JR/jm

SR2-061-.010

cc: M. S. Pollock
J. P. Morin