

JUL 31 1984

D. Carlson

MEMORANDUM FOR: Darrell G. Eisenhut, Director
 Division of Licensing, NRR

FROM: Robert F. Burnett, Director
 Division of Safeguards, IMSS

SUBJECT: ANALYSIS OF NONPOWER REACTOR SABOTAGE

The Commission has recently voted negatively on SECY 83-500 which proposed a rule change to amend the language of 10 CFR 73.40(a). The change would have made the regulations clearly reflect the staff's current policy to not require specific physical protection against sabotage at nonpower reactors (NPRs). In its assessment of this Commission Paper, OPE recommended that the work done by Los Alamos National Lab (LANL) for NPR in 1979, NUREG CR-0843, on which the staff's position was based, be reassessed to assure that the basis for not requiring specific sabotage protection at NPRs is still valid. Also, in a note on the notation vote on SECY 83-500, the Chairman said that although he disapproved the proposed rulemaking he would consider a revised proposed rule that had an appropriate technical basis, which he felt SECY 83-500 lacked. In response to OPE's recommendation and the Chairman's note, the Division of Safeguards is initiating a technical assistance project to verify the basis for determining the extent of sabotage protection needed at NPRs.

The previous LANL study, referenced above, used 10 CFR Part 100 criteria as the level that a sabotage act would have to exceed before any explicit protection against sabotage would be required. In recent discussions with your staff, we have been advised that accident analyses for NPRs use 10 CFR Part 20 criteria to determine if a license's proposed safety systems are sufficient to mitigate the consequences of a one time accident. Please advise us concerning which criteria should be utilized for the consequence analysis.

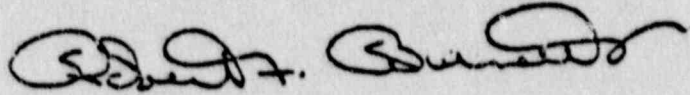
In our technical assistance project to reconfirm the basis for the staff's position on sabotage protection at NPRs, we will initially address acts by an external adversary. However, members of the ACRS have expressed concern that acts by an insider also could be a problem (e.g., by improper manipulation of reactor controls, deactivation of safety systems, etc.). Please advise us as to whether it is credible that accidental or willful operation of an NPR or some class of NPRs (e.g. those above 2Mw) in an improper manner could result in significant consequences to the public health and safety and whether further study is warranted to determine if protection against such events is necessary. This situation may have already been treated, in part, in the safety analyses for NPRs and you may be able to draw a generalization from existing data.

8911140098 891101
 PDR FOIA
 KUPERMAB9-451 PDR

OFFICE							
NAME							Bly
DATE							

JUL 31 1984

We would appreciate your prompt reply on these issues. A quick reply on the use of Part 20 vs Part 100 criteria is especially important because it is needed before we can issue an FY84 technical assistance contract.



Robert F. Burnett, Director
Division of Safeguards, NMSS

DISTRIBUTION:

SGFF r/f s/f
CRONO
Withee
Dube
Burnett

OFFICE	SGFF <i>W</i>	SGFF	SGFF <i>W</i>	SG			
NAME	Withee;mm	Dube	Brown	Burnett			
DATE	7/17/84	7/17/84	7/27/84	7/17/84			