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MAR 10 1978

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MEMORANDUM FOR: J. R. Miller, Assistant Director for
Reactor Safeguards, NRR

FROM: R. G. McCormick, Acting Assistant Director
Division of Safeguards Inspection, IE

SUBJECT: UNRESOLVED ITEMS - DAVIS-BESSE NUCLEAR POWER PLANT

Reference: J. R. Miller memorandum to R. G. McCormick,
dtd February 5, 1978; subject as above.

The referenced memorandum dealt with the resolution of certain issues regarding the implementation of 10 CFR 73.55. There was one issue left unresolved by your memorandum which we hope to clarify here.

Part 73.55(d)(7) requires that access to vital areas will be authorized by the issuance of specially coded numbered badges "indicating vital areas to which access is authorized." The licensee maintains that the magnetic encoding of all badges satisfies this requirement and that they are allowed a delay until August, 1978 for equipment and hardware not in place.

Magnetically encoded badges, although they are capable of providing or denying access to any given vital area via card readers, possess no intrinsic means of visually identifying the vital areas to which the person is authorized access. In other words, unless there is supplementary system of coding badges (by color or other scheme) to parallel the magnetic encoding, an individual who, by whatever means, gains unauthorized access to a vital area would be unidentifiable as an intruder.

It is our belief that the intent of §73.55(d)(7), in view of the emphasis on positively controlling access, is to make available (1) means by which to restrict entry to vital areas, and (2) means by which to detect unauthorized entry, albeit it would be after the fact and be dependent upon the alertness of those authorized entry.

We would appreciate your response to these questions. Your answers will be sent to the regions to keep them informed of generic issues associated with physical protection.

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R. G. McCormick, Acting Assistant Director
Division of Safeguards Inspection
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