

SACRAMENTO MUNICIPAL UTILITY DISTRICT 🗆 6201 S Street, Box 15830, Sacramento, California 95813; (916) 452-3211

October 1, 1980

## CERTIFIED MAIL - RRR

Mr. Robert W. Reid, Chief Operating Reactors Branch No. 4 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Docket No. 50-312 Rancho Seco Nuclear Unit No. 1

Dear Mr. Reid:

Your letter of August 26, 1980 which furnished comments on the Rancho Seco Guard Training and Qualification Plan was received on August 28, 1980. You requested our response within 30 days of receipt of your letter.

The Rancho Seco Guard Training and Qualification Plan (Plan) has been revised to i ... rporate all of the comments forwarded by your letter. Enclosed are four copies of the revised Plan. Specific revisions are marked by a marginal line and are summarized in enclosure (1).

The Revisions are believed to be self-explanatory. Amplification of our response to the more significant comments is given as follows:

- 1. Paragraph 1.4.1 has been revised as requested to state that the Plan will be followed by sixty days after its approval. We consider that this means that duty assignments and responsibilities for each duty assignment will be consistent with those prescribed by the Plan.
- 2. We acknowledge your introductory comment that a compressed period of time for training could potentially interfere with normal security operations. The schedules in the Plan reflect maximum time intervals. We plan to commence use of training materials and tests as they are developed in order to guard against "tail-end" work loading. We do not consider a revision of the Plan is necessary for this item.
- 3. The new tasks that you requested to be added have been incorporated by new Tasks 43 and 44 and by revision of Task 23. To facilitate qualification of our Portal Search Guards (PSG) for either the search-related or access

MATERIAL TRANSMITTED HEREWITH CONTAINS

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control-related tasks, we have added provision in 3.2.1 of the Plan for PSG-1 and PSG-2 qualification. This addition is totally consistent with NRC guidelines.

4. Paragraph 3.2.4 has been rewritten to clarify the supervisory attestment of duty qualification as requested. It is noted that our Special Agent provides the on-site overall security supervision and our Watch Commanders provide the on-site shift security supervision. These responsibilities are described in our Physical Security Plan. Therefore, the Special Agent or designated Watch Commanders will be required to attest that each security force member has demonstrated to their satisfaction that the member can perform satisfactorily those security functions to which the member is assigned.

Sacramento Municipal Utility District believes that all of the comments offered by your letter are fully resolved by the enclosed revision of the Plan. Formal approval of the revised Plan is requested.

Sincerely,

John J. Mattimoe

Assistant General Manager and Chief Engineer

Enclosures (5)

cc w/enclosure:

Mr. R. H. Engelken, Director
Region V, Office of Inspection
and Enforcement
U. S. Nuclear Regulatory Commission
Suite 202, Walnut Creek Plaza
1990 North California Boulevard
Walnut Creek, California 94596