

SG 0.26-4

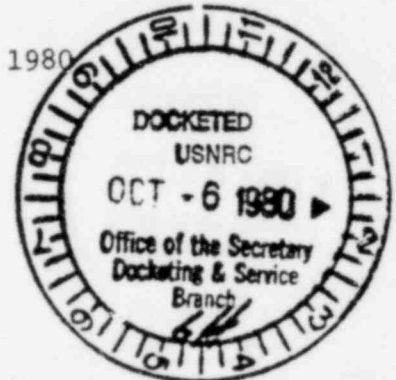
EBASCO SERVICES INCORPORATED

EBASCO

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DOCKET NUMBER
PROPOSED RULE PR *misc notice*
Reg Guide

October 1, 1980



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Att: Docketing and Service Branch

SUBJECT: REGULATORY GUIDE 5.61 (RO), "INTENT AND SCOPE OF
THE PHYSICAL PROTECTION UPGRADE RULE REQUIREMENTS
FOR FIXEL SITES".

Gentlemen:

Ebasco Services has reviewed the subject Regulatory Guide and has the following comments for your evaluation:

73.1 (a) (a) (i)

The proposed rule requires the response force to have special equipment and training to counter antipersonnel ordinances such as grenades.

To date, there are no methods that can effectively counter these weapons with a high degree of assurance. It is also a violation of many local regulations to use explosives in protecting any industrial facility.

73.1 (a) (2)

The proposed rule postulates two or more adversary teams attacking at different points. This rule has no significance to security unless the ~~maximum~~ number of adversaries and teams is established.

73.1 (a) (1) & (2)

Minimizing the impact of a guard being the insider, the proposed rule attempts to limit the quantity of weapons introduced into a facility prior to sabotage.

The rule as stated would even eliminate the controlled storage of weapons at a facility which would greatly impair the effectiveness of the response force to neutralize the adversary.

Acknowledged by card... *10/6/80* ...

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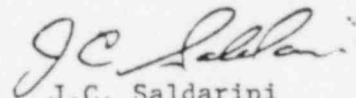
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73.1 (a) (2)

The proposed rule requires effective means of preventing the collusion of two insiders. To date, there are no proven methods of assuring this.

Ebasco hopes these comments will be considered carefully and would welcome the opportunity to participate in any discussions with the NRC on this Regulatory Guide.

Very truly yours,



J.C. Saldarini
Manager
Nuclear Licensing

JCS:mm