

# NSP

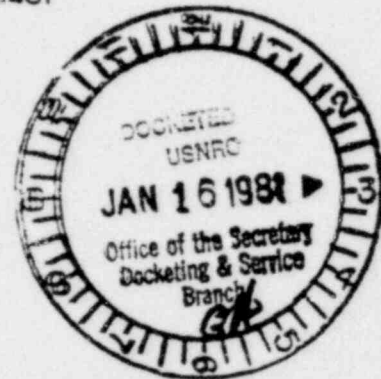
9

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

January 14, 1981

PROPOSED RULE PR 73  
45 FR 79492



Mr Samuel J Chilk  
Secretary of the Commission  
US Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr Chilk:

On December 1, 1980, the Commission published for comment, at 45 Fed. Reg. 79492, a proposed amendment to 10 CFR Part 73 concerning searches of individuals at power reactors. Northern States Power Company wishes to offer a comment on one section of the proposed rule.

One section of 73.55(d)(1) requires "By (45 days from the effect [Sic] date of this amendment), each licensee shall submit proposed amendments to his security plan which define how the amended search requirements of this paragraph will be met." We believe that the 73.55(d)(1) requirements are clear enough that the individual licensee can make changes to his security plan and implement these changes by a "date certain" without need for prior NRC review. Since the NRC has determined that the new access requirements will not decrease the effectiveness of a licensee's security program, the licensee should be able to implement the new requirements, revise his security plan, and report these changes in accordance with 10 CFR 50.54(p). Compliance with the requirements can be confirmed through the normal NRC resident inspection process.

We believe that it would be an unwarranted use of licensee resources to prepare a formal security plan amendment for submittal to the NRC, an equally unwarranted use of NRC Staff for reviewing all of the amendments, and would impose substantial license amendment fees on the licensee for a change which can be accomplished in accordance with 10 CFR 50.54(p). We recommend that the NRC simply direct implementation of the requirements within a fixed period of time after the effective date of the revision to 10 CFR 73.55(d)(1).

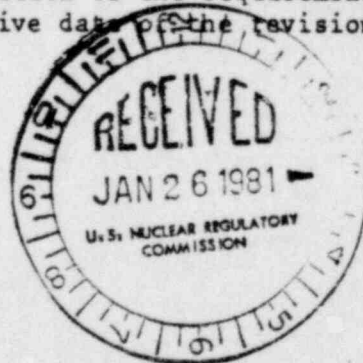
Yours very truly,

*L. O. Mayer*

L O Mayer, PE  
Manager of Nuclear Support Services

LOM/jh

cc: J G Keppler



44-1, P. 3

810 2040 261

Acknowledgment by card...

POOR ORIGINAL