



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D. C. 20555

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MEMORANDUM FOR: Reactor Safeguards Licensing Branch

FROM: Robert A. Clark, Chief
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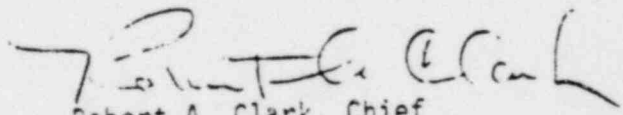
SUBJECT: COMPENSATORY MEASURES FOR VITAL AREAS LACKING
 THE "TWO BARRIER PROTECTION" - REVIEW GUIDELINE
 NUMBER 13

10 CFR 73.55 requires that vital equipment be protected by a minimum of two barriers i.e., Protected and Vital, which are defined in 10 CFR 73.2. The barriers coupled with the defense in depth concept, isolation zones, continuous monitoring and periodic surveillance result in high assurance detection and resistance to penetration.

In some cases barrier separation is impossible to achieve due to operational design needs, as exemplified most often by the positioning of the service water intake structures on borders of bodies of water. In other cases location of vital equipment was instituted prior to the issuance of 73.55, making it impractical to require relocation. In both cases other measures must be implemented to compensate for the loss of the basic criteria.

The following represent some acceptable compensatory (or equivalent) measures that may be used together or separately (depending upon site specifics) in achieving the objective:

1. Hardening of common barriers.
2. Additional "early warning" monitoring devices.
3. More frequent surveillance.
4. Positive response posture to common barrier locations.
5. Positioning of security post in close proximity of common barriers.


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