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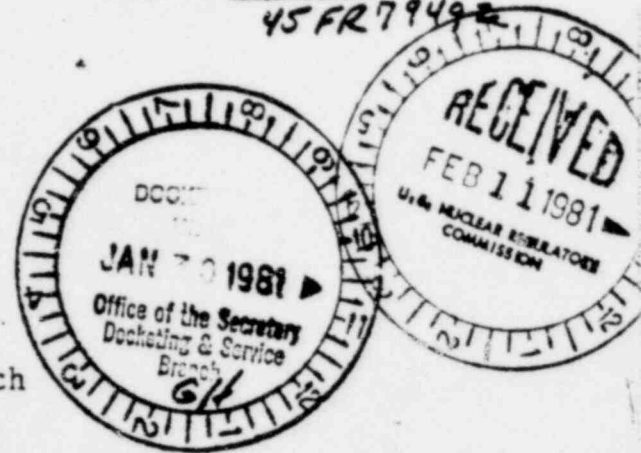
DOCKET NUMBER PR 73
PROPOSED RULE 45 FR 79492

January 23, 1981

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

Attention: Docketing and Service Branch

Dear Sir:



In the Federal Register Notice of December 1, 1980 (45 F.R. 79492) comments were solicited on the proposed rule 10 CFR Part 73, "Searches of Individuals at Power Reactor Facilities."

The Atomic Industrial Forum's Committee on Domestic Safeguards has reviewed the proposed rule and appreciates that the NRC has tried to achieve a reasonable balance on pat-down searching of nuclear power plant employees. However, we believe that the proposed rule should not be issued at this time. A final rule regarding search of individuals should be promulgated as a part of a total rulemaking related to the insider threat which also includes employee screening and access controls to vital areas.

We are opposed to mass pat-down searches of individuals on the basic principle that it will lead to ineffective searches because of the time it takes to process large numbers of people through the control point. This comment is particularly applicable to the occasions when the mechanical detection equipment is inoperable. We recommend that a random pat-down search be used in this situation as being more effective as a security measure. We endorse draft ANSI Standard N18.17, Security of Nuclear Power Plants, dated December 1, 1980, page 5, which states that in-depth screening, and continued observation programs makes unnecessary a detailed physical search of personnel.

We believe that site service personnel who have received utility clearance for unescorted access should be treated in the same manner as regular utility employees regarding pat-down search.

Regarding visitors to nuclear power plants; this group of people would have been invited by utility management and they will be under constant escort while in the protected areas. There is no significant justification to require visitors without work related activities to undergo pat-down search in normal situations, especially when it is important to educate

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Secretary of the Commission

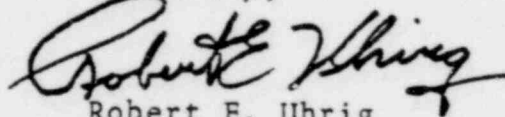
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the public to a better understanding of nuclear energy. We recommend that escorted visitors receive the same search procedures as regular utility employees.

To further support our contention that the proposed rule on search of individuals is excessive, we cite NUREG-0703, "Potential Threat to Licensed Nuclear Activities from Insiders," section 2.6.1 which states that nuclear events involving insiders are too few in number to support meaningful analyses of the insider threat.

In conclusion, we strongly urge the NRC to re-evaluate their requirements to pat-down search all individuals when the mechanical detectors are inoperative and to pat-down search all site service personnel and visitors. We recommend instead that a random pat-down search be used in lieu of mass search of individuals in the above categories.

Sincerely,



Robert E. Uhrig
Chairman,
Committee on Domestic
Safeguards

REU/cpl