

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 29, 1981

30-19102

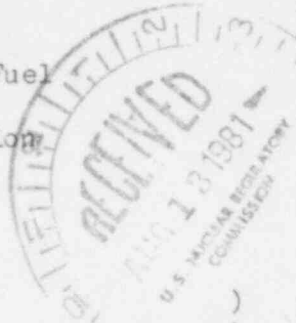
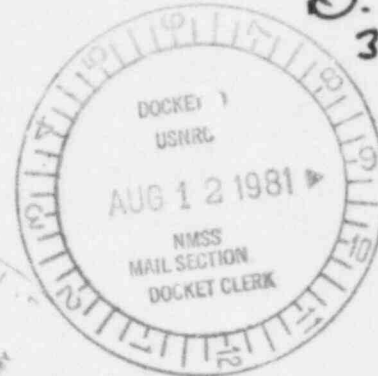
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Return to
D. Cramer
396-SS

Director, Office of Nuclear Material Safety
and Safeguards

Attn: Mr. L. C. Rouse, Chief
Advanced Fuel and Spent Fuel
Licensing Branch

U.S. Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr. Rouse:

In the Matter of the
Tennessee Valley Authority

) Docket No. 30-19102
)

Please refer to my letters to H. R. Denton dated July 31 and November 17, 1980 in which TVA requested amendments to facility operating licenses DPR-33, DPR-52, and DPR-68 for onsite storage of low-level radioactive waste generated from the operation of Browns Ferry Nuclear Plant (BFNP).

TVA has reevaluated the physical security commitments contained in the July 31, 1980 letter for the BFNP low-level radioactive waste storage facility and finds them to be more restrictive than the minimum security requirements described in draft 10 CFR part 61 for the disposal of low-level radioactive waste. Since the BFNP facility is for storage only, we believe the following changes will result in an adequate security system.

Accordingly, please change the BFNP licensing documents to read as follows.

Page 2-6 presently reads:

2.2 SECURITY

The storage facility will be surrounded by a wire fabric fence with three strands of barbed wire, totaling eight feet in height with a 20-foot isolation zone on each side. An intrusion detection system and CCTV system are provided and terminate in a gatehouse. The gatehouse is designed for 24-hour operation with communications with

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the nuclear plant via radio and telephone. Yard lighting of 0.2 foot-candle and a patrol road within the fenced area is provided for surveillance purposes. Two points of access through the fence will be provided. The primary source of power for all electrical security equipment is offsite power. Backup power will be provided by a diesel generator located within the facility boundary.

Change to:

2.2 SECURITY

The storage facility will be surrounded by a wire fabric fence with three strands of barbed wire, totaling eight feet in height. All individuals and vehicles, while on the facility site, will be monitored--either physically or electronically. Communication equipment is located at each nuclear plant to contact local, State, and Federal law enforcement agencies and emergency services. The fence will be provided with one or more points of access and access will be positively controlled while individuals and vehicles enter and exit the LTOSF. All individuals entering and exiting the LTOSF will be positively identified. TVA will conduct a yearly audit of the LTOSF security system.

Page 2-8 presently reads:

2.7 ELECTRICAL REQUIREMENTS

The LTOSF will be provided with electrical power from offsite by the local utility. As a backup, the facility will have an electrical power generator sufficiently sized to provide the power required to operate all security features for a minimum of 12 hours. The generator will be remote from the security gatehouse with manual controls located inside the gatehouse.

Change to:

2.7 ELECTRICAL REQUIREMENTS

The LTOSF will be provided with electrical power from offsite by the local utility.

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Page 3-4 presently reads:

3.1 SECURITY OPERATIONS

Closed circuit television (CCTV) monitors will be used to detect and observe potential intrusion into the storage area. Monitor screens will be located in the gatehouse. In the event of a loss of CCTV, security personnel will call for immediate repair. A spare CCTV will be put in service, if available. During the time that the CCTV is out of service, the area normally covered by CCTV observation shall be continuously patrolled by security personnel to ensure that the security of the area is not compromised. Additional security personnel shall be utilized when necessary.

Change to:

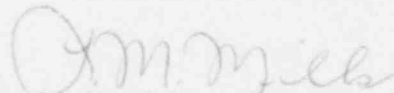
3.1 SECURITY OPERATIONS

Either the physical or electronic measures will be used to monitor individuals and vehicles while on the facility site as well as when leaving the facility. These measures will ensure that the security of the area is not compromised. Additional measures (to include security personnel) shall be utilized when necessary.

We believe these recommended changes are appropriate based on our reevaluation of existing NRC requirements, no perceived security threat, and consequently a more cost effective program for TVA.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

cc: See page 4

Director, Office of Nuclear Material Safety

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cc: Mr. Charles R. Christopher
Chairman, Limestone County Commission
P.O. Box 188
Athens, Alabama 35611

Office of Nuclear Reactor Regulation
Attn: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. K. D. Fagan, Supervisor - Nuclear
General Electric Company
832 Georgia Avenue
Chattanooga, Tennessee 37402

Mr. Ira L. Myers
State Health Officer
State Office Building
Montgomery, Alabama 36104

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