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VIRGINIA POWER

September 24, 1992

Dr. Thomas Murley, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

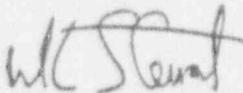
Dear Dr. Murley,

To follow-up our conversations during your recent visit to Surry Power Station, I am attaching some examples of cost savings that could be obtained by either the relaxation or elimination of NRC requirements that do not significantly enhance nuclear safety. Although we have provided these examples to NUMARC and provided related input to the NRC on proposed rulemaking, we also plan to formally request relief from marginal requirements whenever there are significant cost savings to be obtained without reducing our commitment to the highest level of nuclear safety. I will contact you in the near future to more fully discuss these requests for relief as our plans are finalized.

In the August 31, 1992 Federal Register, the NRC requested comment on regulatory reporting requirements for possible elimination. We intend to submit comments to the NRC on this issue. It is estimated that a large cost savings could result from a reduction in non essential regulatory reporting requirements.

We hope your schedule will also allow a visit to our North Anna Power Station this year. Please contact me if you have questions or would like more detailed information.

Very truly yours,

  
W. L. Stewart

Attachment

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**COST SAVING EXAMPLES ASSOCIATED WITH  
ELIMINATION OF NRC REQUIREMENTS THAT DO NOT  
SIGNIFICANTLY ENHANCE NUCLEAR SAFETY**

**Security**

10 CFR 73.55 and 73.1 state requirements regarding vital area access controls and physical protection. Protected Area access controls could be enhanced, along with existing internal monitoring instrumentation, to provide effective protection to all areas within the Protected Area, to include the vital areas. This alternative could save approximately \$150,000 per year without any reduction in the level of physical security.

10 CFR 73.55 requires a search of security officers upon reentry to the protected area during the performance of their duties. Also, the regulation requires an armed escort of authorized vehicles driven by personnel badged for unescorted access and additional access control at containment during maintenance and refueling. These requirements are unnecessary considering existing protective measures already in place. If these requirements were to be deleted, savings to our programs are estimated to be \$20,000 a year.

10 CFR 73.57 requires a criminal history check process for all those who require unescorted access privileges for a nuclear power station. This requirement is ineffective because the results of the check are not received for 30 to 90 days following submittal of the fingerprints. Unescorted access authorization is granted to the facility pending the return of the record check which eliminates any value in determining the propensity of the individual toward unreliable or untrustworthy conduct. If this requirement was eliminated, it would result in program cost savings of about \$50,000 per year.

**Emergency Preparedness**

10 CFR 50 Appendix E requires that licensees exercise their emergency plans at every site annually. The frequency of emergency preparedness exercises should be allowed to vary from annually to two or more years based on performance. This should result in a significant resource savings and a reduction in NRC fees without a reduction in the nuclear safety of the plant. We estimate the total program cost savings to be \$215,000 a year.

In addition, the audit requirement frequency under 10 CFR 50.54 (t) requires an annual audit of the emergency preparedness programs. This should also be extended to match the frequency of the exercises for an annual savings of \$33,000 for our programs.

### Fitness for Duty

10 CFR 26.24 requires that random fitness for duty testing be conducted at a rate equal to at least 100% of the workforce badged for unescorted access. Industry data for 1990 shows 0.37% of random tests were positive and 1991 industry data shows 0.33% of random tests were positive, a declining trend. Reducing the random testing rate from 100% to 25% would result in a substantial reduction in cost without increasing the probability of fitness for duty problems or reducing the level of safety. We estimate that this would result in program savings of approximately \$120,000 a year.

10 CFR 26.22 requires annual supervisory fitness for duty retraining. The requirements for retraining could be extended to once every 2 or 3 years with no negative impact.

The fitness for duty testing program is required to be audited every 12 months per 10 CFR 26.80. The original audit schedule was based on the need to assure the reliability and accuracy of chemical testing procedures. Since the promulgation of this requirement, quality control requirements have been established to ensure the continued reliability and accuracy of the chemical testing program. The reduction of frequency of audits would not decrease the accuracy or reliability of the testing program and would result in a significant cost savings of approximately \$111,000 for our program per year.