SAFEGUARDS INFORMATION

ENCLOSURE A TO BE WITHHELD FROM
PUBLIC DISCLOSURE

Docket Nos.: 50-443
and 50-444

MAY 14 1982

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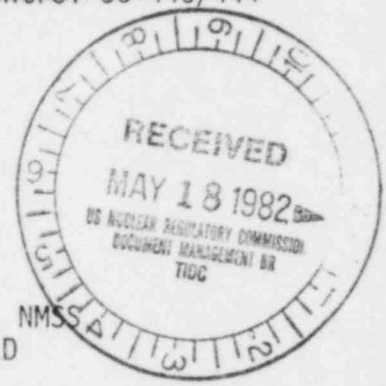

Mr. William C. Tallman
Chairman and Chief Executive Officer
Public Service Company of New Hampshire
Post Office Box 33
Manchester, New Hampshire 03105

Dear Mr. Tallman:

Subject: Request for Additional Information (Physical Security Licensing Branch)

This is in response to your submittals of December 12, 1981 regarding the Seabrook Physical Security and Guard Training and Qualification Plans. We have determined that additional information is necessary to complete our evaluation. Please provide the items of information set forth in the enclosures within 30 days of receipt of this letter.

Enclosure A contains Safeguards Information required to be protected in accordance with 10 CFR 73.21.

Sincerely,

Original signed by
Frank J. Miraglia

Frank J. Miraglia, Chief
Licensing Branch No. 3
Division of Licensing

Enclosures:
A) Security Plan Review Comments
B) Guard Training Plan Comments
C) Perimeter Intrusion Detection System
D) Review Guideline Number 7

cc w/o Enclosure A:
See next page

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NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO: 1981—335-960

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COMMENTS ON SEABROOK

GUARD TRAINING AND QUALIFICATION PLAN

	PAGE	SECTION	COMMENT
910.44	3	1.2.1.3	Appendix B.I.B.(1)(b) requires that corrective eyeglasses be safety glasses. Please specify that all plastic lenses will be shatterproof.
910.45	5	1.3	Commit to the requirements of Appendix B.I.C. which states that a medical examination be conducted within the 30 day period prior to physical fitness qualification.

910.46 Task 18 p.25

Reference a commitment either in the Contingency Plan or the Security Plan to contact LLEA. This commitment should also identify the individual responsible for notification of LLEA.

910.47 ADDITIONAL TASK INFORMATION

It is acknowledged that access control procedures are addressed in Tasks #2, #8, #11 and #37, however, there is no reference to procedures during security or site emergencies. While your response states the procedures are "essentially" the same as those for normal conditions, provide additional information specifying variations and/or referencing normal procedures.

Enclosure(s) A

Decontrolled

ENCLOSURE C

REVIEW OF ATTACHMENT B
"PERIMETER INTRUSION DETECTION SYSTEM"
DATED OCTOBER 12, 1981

INTRODUCTION

The requirements of 10 CFR 73.55 state that "Detection of penetration or attempted penetration of the protected area or the isolation zone adjacent to the protected area barrier shall assure that adequate response by the security organization can be initiated." We have reviewed the arguments presented by the Public Service Company of New Hampshire (the applicant) to determine if the perimeter intrusion detection system proposed for installation at the Seabrook Station meets the regulation or the intent of the regulation. During this review the staff was assisted by security experts of the Sandia National Laboratories and other government agencies.

DISCUSSION

As stated in the Regulatory Guide 5.44, "Perimeter Intrusion Alarm System," the use of vibration or strain-detection systems should be used only as a secondary or back-up perimeter alarm system except when none of the other five types of perimeter alarm systems will work (e.g., because of the environment) and after the NRC's approval has been received.

The arguments presented in the report ("Perimeter Intrusion Detection System") that the "Inertiaguard" system represents the only type of system that could withstand the environmmental conditions at the Seabrook Station were not persuasive for the following reasons:

1) There is no body of evidence indicating that fence mounted vibration or strain-detection systems are significantly less

affected by environmental conditions than are microwave or E-field devices.

2) There is ample proof of the successful employment of microwave and E-field systems at power reactors having similar environmental extremes as Seabrook.

In a related matter, there are serious doubts that "Inertiaguard" systems meet the tamper indicating and/or self-checking requirements of 10 CFR 73.55(e)(2).

CONCLUSION

The proposed system is inconsistent with the criteria in Regulatory Guide 5.44 and possibly fails to satisfy regulatory requirements. This system cannot be approved without substantial site testing that verifies the ineffectiveness of the other approved detectors.

Due to the environmental extremes discussed in the referenced report it is recommended the applicant utilize two perimeter intrusion detection systems. These systems should be chosen such that the enviornmental conditions affecting one system will have a reduced impact upon the other. For example, a volumetric detection system and a fence mounted system would tend to provide detection information to the central alarm station operator such that alarms could be resolved during environmental extremes.

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SAFEGUARDS INFORMATION ENCLOSURE D

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

FEB 16 1982

MEMORANDUM FOR: Power Reactor SG Licensing Branch Members

FROM: George W. McCorkle, Chief
Power Reactor SG Licensing Branch

SUBJECT: REVIEW GUIDELINE NUMBER 7 REVISION 3 - REDUCING THE PROBABILITY OF COMPROMISE THRU KEY CONTROL (APPLICABLE TO POWER REACTORS IMPLEMENTING 10 CFR 73.55)

10 CFR 73.55(d)(9) states: "All keys, locks, combinations and related equipment used to control access to protected and vital areas shall be controlled to reduce the probability of compromise. Whenever there is evidence that any key, lock, combination, or related equipment may have been compromised it shall be changed. Upon termination of employment of any employee, keys, locks, combinations, and related equipment, to which that employee had access, shall be changed."

The objective of controlling keys, locks, combinations, and related equipment is to reduce the probability of compromise. An acceptable approach to lock and key control should include a rotation program, limiting employee access to locks, keys, combinations and related equipment, changing locks, keys, combinations and related equipment when an individual is terminated for cause or there is evidence that such equipment or devices have been lost or compromised.

The following set of actions describes an acceptable program for reducing the probability of compromise:

(1) Change all keys, locks, and combinations and related equipment used to control access to protected areas and vital areas at least every 12 months.

(2) Issue keys, locks, combinations, and other access control devices to protected and vital areas only to those individuals who possess access authorization to those areas.

(3) Change keys, locks, combinations, and related equipment to which an individual had access within five days, and immediately for card keys, after access authorization is withdrawn due to lack of trustworthiness, reliability, or inadequate work performance.

(4) Change keys, locks, combinations, and related equipment within five days, and immediately for card keys, when there is evidence that such equipment or devices have been lost or compromised.

When separated from enclosure(s) A
Handle this document as
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George W. McCorkle, Chief
Power Reactor SG Licensing Branch

cc: R. F. Burnett

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