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Docket Nos.: 50-324/325

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Region II



Mr. J. A. Jones
Senior Executive Vice President
Carolina Power & Light Company
336 Fayetteville Street
Raleigh, North Carolina 27602

Dear Mr. Jones:

During the development of the upgraded physical security rules a few years ago, there were a number of concerns expressed that the new requirements might lead to a reduction in reactor safety. On the other hand, there are some who are concerned that the requirements for reactor safety may reduce the effectiveness of the physical security measures at facilities. These competing concerns were given careful consideration in finalizing the rules.

Now that the upgraded physical security systems have been in place for some time and experience in their use has been gained, we believe it would be useful to review the safety/safeguards interface in place at a few reactors to determine whether the requirements of either one are having an adverse effect on the other. Before initiating an industry-wide review of this issue, we believe that the need for, and scope of, such a review can best be determined by informal management level discussions at a few representative facilities. To this end, the Director of Safeguards, NMSS, and the Deputy Director of Licensing, NRR, would like to meet with your management to explore the issue. These meetings would be more effective if held at the site so that we can better appreciate the practical problems that are being encountered.

To help focus our discussion, enclosed you will find a list of representative questions on the subject. We plan to use these questions as an agenda for our meeting with you -- no formal written responses are expected. I hope you will assist us in this effort. Your NRC Project Manager will be contacting you to arrange the meeting, if you are agreeable to it.

Sincerely,

Original signed by
Darrell G. Eisenhower

Darrell G. Eisenhower, Director
Division of Licensing

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Enclosure:
As Stated

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5/18/82

By phone 5/10/82

OFFICE	cc: See next page	DL:SSPB	DL:SSPB:ABC	DL:AD/L	NMSS	DL:DD
SURNAME		EMcPeck:cc	HBernard	RTedesco	RBurnett	RPurple
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SAFETY/SAFEGUARDS INTERFACE QUESTIONS1. Protected Area Access Controls

- a) Do protected area access control and search requirements have an adverse impact on safety during routine operations?

If yes, please explain. Also, if the answer is yes, do you believe the NRC requirements in this area can be met without such impact by a system redesign?

- b) Do you expect protected area access control and search requirements to have an adverse impact on safety if an emergency response is required from off-site? If yes, please explain. Also, if the answer is yes, is this impact more on your real ability to deal with an emergency or on your ability to meet NRC emergency planning requirements (such as NUREG-0654) that certain people must respond to the site within a very limited time?

2. Vital Area Access Controls - Routine

- a) Do vital area security access controls have an adverse impact on safety during routine operations? If yes, please explain. Also, if the answer is yes, do you believe that the NRC requirements can be met without such safety-impact by a system redesign?

- b) Do vital area security access controls have a positive impact on safety by keeping "sidewalk superintendents" out of vital areas when "interesting" work is being performed?

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- c) Does NRC pressure to minimize the number of people authorized access to vital areas have an adverse impact on safety during routine operations? If yes, explain.
- d) Do NRC surveillance and testing requirements increase the number of people authorized access to vital areas beyond that prudent for good security? Do such requirements provide additional opportunities for malevolent acts?
- e) Are hardened chains and padlocks use for the protection of Engineered Safety Feature valves? If yes, what are the safety implications?

3. Vital Area Access Controls - Emergency

- a) Do you expect vital area security access controls to have an adverse impact on your staffs capability to deal with accidents or emergencies? If yes, please explain.
- b) Is unimpeded egress assured from vital areas following a power failure to the electrical locking system?
- c) Are locks or other fastening devices used on emergency exits that would prevent escape from the inside of a building?

4. Work Rules - Routine

- a) Do security-related work rules (e.g., the two-man rule) adversely impact safety during routine operations? If yes, please explain.

5. Work Rules - Emergency

- a) Do you expect security related work rules (e.g., the two man rule) to adversely impact your staff's capability to deal with accidents or emergencies? If yes, please explain.
- b) The Central Alarm Station, along with the Secondary Alarm Station, which controls all security-related systems, does not have the same radiological habitability requirements as the "TSC." In view of this, do you see any possible conflicts associated with assuring adequate safety/safeguards during a safety-related emergency?

6. Equipment Interaction

- a) Have you experienced problems with security equipment adversely impacting safety equipment? (e.g., use of security walkie talkies in control room causes reactor trip). If yes, please explain. Do you believe these indicate or constitute a safety problem?
- b) Have you experienced problems with plant operating or safety equipment adversely impacting security equipment? (e.g., starting circulating water pumps trips the security access control computer) If yes, please explain. Do you believe that these indicate or constitute a security problem?

- c) Do you believe that patrols of vital areas by armed security officers present a potential safety hazard? If so, how does the frequency of equipment damage or personnel injury related to this practice compare to the frequency from other types of accidents?

7. Cost, Constuction, and Management Attention

- a) Do you believe that the expense and requirement for management attention associated with the security program has prevented you from initiating plant modifications that, although no specifically required by NRC, would enhance plant safety? If yes, please explain.
- b) Do you believe that the expense and requirement for management attention associated with NRC mandated safety changes has prevented you from initiating program changes that, although not specifically required by NRC, would enhance plant security? If yes, please explain.
- c) Do you believe that plant security posture has been lowered during construction associated with safety related backfits of the plant. If yes, please explain.
- d) Has construction associated with meeting NRC security requirements had an adverse impact on plant safety. If yes, please explain.

8. Interpersonal Relations

- a) Is there good rapport and mutual respect between plant security personnel and plant operational and construction personnel? If so, can you identify contributing factors? If not, can you identify problem areas? Do they

relate to NRC's regulatory approach or requirements in either the safety or security area or both?

- b) Does the use of guards, for compensatory measures, due to the physical limitations of security equipment contribute to declining morale, complacency, and unsatisfactory performance of the guards, which could impact safety.
- c) Is the present practice of weapons being permitted into sensitive areas of the plant a safety concern?

9. Records and Reports

- a) Are NRC safeguards and safety reporting requirements consistent? Are duplicate safety and safeguards reports required on the same event?
- b) Are NRC safeguards and safety recordkeeping and retention requirements consistent? Are duplicate safety and safeguards reports of the same information required to be maintained?