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(58-FR 58804)

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Southern California Edison Company

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January 3, 1994

Mr. Samuel J. Chilk  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Services Branch

Dear Mr. Chilk:

Subject: Malevolent Use of Vehicles at Nuclear Power Plants

- Reference:
1. 58 Federal Register 58804, "Protection Against Malevolent Use of Vehicles at Nuclear Power Plants," November 4, 1993
  2. Letter, T. E. Tipton (NUMARC), "Notice of Proposed Rulemaking-Amendments to 10 CFR 73 to Protect Against Malevolent Use of Vehicles at Nuclear Power Plants 58 Fed. Reg. 58804 - November 4, 1993 Request for Comments," January 3, 1994

In the referenced Federal Register, the NRC published for public comments the proposed rulemaking on Malevolent Use of Vehicles at Nuclear Power Plants. Provided below are Southern California Edison's (Edison's) comments on the proposed rulemaking. Basically, Edison concurs with NUMARC's comments that were provided in Reference 2. Although Edison does not disagree with the need by nuclear utilities to take additional security precautions in the wake of the World Trade Center (WTC) event, Edison believes the NRC should modify the proposed rule as indicated below:

1. Edison believes the requirement for licensees to provide the NRC a written report within 90 days is too stringent.

Edison recommends that licensees should be given 180 days after the effective date of the final rule to perform the required analysis and to prepare and issue the submittal.

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2. The requirement for licensees to implement its vehicle control measures (including its vehicle barrier system) within 360 days of the rule becoming effective may be impractical. There are many factors (e.g., outage schedules, material availability, few commercial manufacturers of vehicle barriers) that may inhibit the licensees' ability to complete the vehicle barrier system within this time.

Edison believes the NRC should modify this requirement to allow for case-by-case extensions of the effective date by the Commission where the licensee can present good and sufficient reason for the extension.

3. The size of the design basis explosive being proposed for the design basis threat is unreasonably large and burdensome. Edison believes the NRC's proposed threat vehicle explosive size is significantly larger than the explosive used at the WTC.

Edison recommends that the NRC reduce the size of the design basis explosive (large to not more than 75% of the NRC's proposed charge).

If you have any questions or require additional information, please contact me.

Sincerely,

