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Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

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(58FR 58804)

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David W. Rogers
Plant Safety and Licensing Director

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Secretary, U.S. Regulatory Commission
Washington, DC 20555

Attn: Docketing and Services Branch

COMMENTS ON PROPOSED AMENDMENT TO 10CFR73 TO PROTECT AGAINST MALEVOLENT USE OF VEHICLES AT NUCLEAR POWER PLANTS

Palisades Nuclear Plant provides the following comments concerning the proposed amendment to 10CFR73, "Protection Against Malevolent Use of Vehicles at Nuclear Power Plants," as published in the November 4, 1993 Federal Register (pages 58804-58807). The proposed amendment to 10CFR73.55(c)(9)(i) reads as follows:

*Each licensee authorized to operate a nuclear power reactor shall:
By (insert 90 days from effective date of the rule) submit to the Commission a summary description of the proposed vehicle control measures as required by 10CFR73.55(c)(7) and the results of the vehicle bomb comparison as required by 10CFR73.55(c)(7). For licensees who choose to propose alternative measures as provided for in 10CFR73.55(c)(8), the submittal must include the analysis and justification for the proposed alternatives;*

The proposed rule states that licensees are required to submit a summary description of the vehicle control measures within 90 days from the effective date of the rule. Due to the complexity of calculations, design, and planning, this is not a realistic time frame to perform the analyses and develop a comprehensive, cost-effective plan. We suggest this be increased to 180 days.

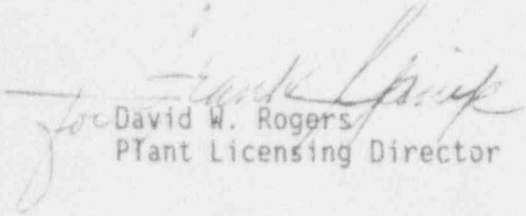
Proposed rule, 10CFR73.55(c)(9)(ii) also states:

By (insert 360 days from the final rule effective date), fully implement the required vehicle control measures, including site-specific alternative measures as approved by the Commission;"

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The 360 day time frame for full implementation of this rule is also unrealistic. The three phases to implementation include (1) Plan Development; (2) Review and approval by the NRC; and (3) Design, Procurement, and Construction. The plan development (as currently proposed) is slated for 90 days, however, the time frame for the review and approval process remain an unknown at this time. The review of over 60 different site plans could take much of the remaining 270 days which NRC had slated for licensee construction and implementation. Further, due to the limited number of vendors manufacturing some of the equipment necessary to implement this rule there may be long procurement periods. Another factor which would affect construction of the vehicle protection system is the adverse weather conditions at some northern sites. Frozen ground, ice, and snow could prevent or slow construction activities. We suggest that this paragraph be revised to state that the licensee have 360 days to implement this rule after plan approval by the Commission.


for David W. Rogers
Plant Licensing Director