

EXXON NUCLEAR COMPANY, Inc.

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Richland, Washington 99352
TELEPHONE: (509) 375-8100
TELEX: 15-2881

PDR - Return 396-55

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70-1257

January 13, 1982



Mr. L. Evans, Chief
Fuel Facility Safeguards Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

License No. SNM-1227
Docket No. 70-1257

Dear Mr. Evans:

In the process of implementing the most recent revision of our physical protection plan for material of low strategic significance, it was noted that a literal interpretation of item C on page 2.0-3 of XN-NF-538, Revision 2 exceeds the regulatory requirements and places an unwarranted burden on our security personnel and staff. This is to inform you of our interpretation of the intent of that paragraph and to advise you of our plans to implement procedural changes in accordance with that interpretation. These changes are considered to be of a type permitted by 10 CFR 70.32. Specifically, the changes do not decrease the level of effectiveness of our physical protection system.

With regard to the above, item C on page 2.0-3 of XN-NF-538, Revision 2 states as follows:

"All personnel entering or leaving the CAA whether on foot or in vehicles must pass by a security guard or receptionist who checks the identification badges."

The requirement to check identification badges of all personnel entering the area will remain unchanged. However, the requirement to check badges of personnel exiting the area does not add to our capability to control personnel access or removal of material from the area. Rather, the intent is considered to be to require that the security guard or receptionist 1) recognize all exiting individuals and challenge those who are not recognized, and 2) be cognizant of potential material diversion efforts. Consequently, procedures which implement the intent, rather than the literal statement, will be issued to the security guards and receptionist.

FEE EXEMPT
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C PDR

AN AFFILIATE OF EXXON CORPORATION

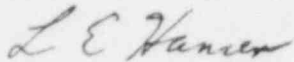
Mr. L. Evans

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January 13, 1982

If you have any question with respect to the above interpretation and/or procedural changes please contact me on (509) 375-8657.

Sincerely,

Handwritten signature of L. E. Hansen in cursive script.

L. E. Hansen, Staff Specialist
Criticality Safety and Physical Security

LEH:slr

cc: L. R. Norderhaug - NRC Region V

Docket No. 70-1257

221112

"SAFEGUARDS AMENDMENT"

MC # _____

SG # _____

MCL# 07001257760 #F

PSL# _____

William O. Miller
License Fee Management Branch
Office of Administration

MATERIALS SAFEGUARDS AMENDMENT CLASSIFICATION

Applicant Edison

License No: SNM-1227 Fee Category: _____

Application Dated: 1/13/82 Received: 1/18/82

Applicant's Fee Classification: 70.32

The above application for amendment has been reviewed by the NMSS Division of Safeguards in accordance with Section 170.31 of Part 170 and is classified as follows:

1. Safeguard amendment to licenses in fee Categories 1A through 1H

(a) _____ Major Safeguards

(b) _____ Minor Safeguards

(c) _____ Safeguards (Categories 1D through 1G only)

(d) _____ Administrative

2. Justification for reclassification: _____

3. The application was filed (a) _____ pursuant to written NRC request and the amendment is being issued for the convenience of the Commission, or (b) Other (state reason): _____

Change does not decrease the effectiveness of the phys sec. plan - fee exempt. - 70.32(c)

Sec. plan ~~item~~ - item c, pg 2.0-3

Signature: RR Rentschler

Division of Safeguards, NMSS
Date: 1/21/82