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October 22, 1982

Mr. Ronald C. Haynes
Regional Administrator
U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Haynes:

Public Service Electric & Gas Company hereby requests that the interim Security Access Permit (SAP) program, as outlined in the confirmatory letter 82-22 of August 18, 1982, instituted at Salem Generating Station be relaxed during extended refueling outages at either unit.

Under outage conditions the SAP system inhibits critical maintenance work and provides little or no protection against vandalism. We believe the SAP system should be discontinued during periods of extended refueling outages for the following reasons:

1. Several hundred workers are in a compartmentalized area at one time rendering the list of workers too long to be of value during a subsequent investigation. However, the large number of workers (witnesses) would tend to inhibit acts of vandalism.
2. In Modes 5 and 6 most of the safety related systems protected by the SAP system are not required to maintain the reactor in a safe condition.
3. Tampering with the heat sink systems required in Modes 5 and 6 would quickly become apparent to the operator in the control room.
4. Due to limited decay heat the loss of the RHR system during an extended outage can be tolerated for a relatively longer period of time before a safety problem would develop.

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Prior to placing the unit back in service the Technical Specification surveillances and valve alignments will be performed on the following systems:

- Reactor Protection System Instrumentation
- Emergency Core Cooling Systems
- Electrical Power Systems
- Reactor Coolant System
- Reactivity Control Systems
- Containment Systems
- Auxiliary Feedwater System
- Component Cooling System
- Service Water System
- Fire Protection Systems
- Control Air System

Concurrent with this testing, an inspection will be conducted of the switchgear enclosure and instrument panels to confirm that tampering has not taken place.

The SAP program will be reinstated prior to performing the Technical Specification surveillance tests and valve alignments to prevent tampering before plant startup.

Relaxation of the program for the duration of the outage would not result in devitalizing areas. Normal controls such as security patrols, screening, badge display, and use on entry cardreaders would remain in effect.

Based upon discussions on October 22, 1982 with R. Starostecki of Region I, we understand the conditions and limitations of this letter are acceptable to you and your staff of the Nuclear Regulatory Commission.

Sincerely yours,

R A Uderby / JTB