



Consumers
Power

POWERING

MICHIGAN'S PROGRESS

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FILE PRM 73-9
(56 FR 3228)

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Eugene R VanHooft
Director of Nuclear
Safety Services

February 26, 1991
ERV 91-22

Mr Samuel J Chilk
Secretary
Att: Docketing and Service Branch
US Nuclear Regulatory Commission
Washington, DC 20555

RE: NUCLEAR CONTROL INSTITUTE AND THE COMMITTEE TO BRIDGE THE GAP:
PETITION FOR RULEMAKING - UPGRADING THE DESIGN BASIS THREAT FOR
RADIOLOGICAL SABOTAGE OF NUCLEAR REACTORS
(56 FED REG 3228 - JANUARY 29, 1991)
REQUEST FOR COMMENTS

Dear Mr Chilk:

Consumers Power Company has reviewed comments made by NUMARC concerning the Petition for Rulemaking to Upgrade the Design Basis Threat for Radiological Sabotage of Nuclear Reactors and concurs with these comments. In particular, the Company has maintained close contact with local law enforcement agencies near its two nuclear power plants and has practiced quick response to a threat of physical sabotage with backup from these agencies. In addition to local law enforcement agencies, the Company has drilled with State and Federal agencies for rapid backup to any physical threat of sabotage.

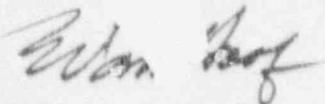
The defense-in-depth philosophy used so effectively in providing safety in nuclear plant operations is also used against physical sabotage threats. The protection of vital equipment is inherent in nuclear plant design. Hardened concrete structures provide this protection which is backed up by security systems of fences, lights, cameras and warning systems. In addition, physical barriers both natural and man-made emplacements protect approaches to the plants.

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The Big Rock Nuclear Plant has operated for close to 30 years and Palisades for nearly 20 years with no threats of physical sabotage. Available intelligence does not substantiate the development of a physical sabotage threat in the future as proposed by the petitioner even considering the Middle East situation.

In view of the above, it is recommended that the NRC deny the petition to increase the design basis threat for security.

Respectfully,

A handwritten signature in cursive script, appearing to read "William R. Wolf".