

MAR 14 1991

Docket Nos. 50-220
50-410

Niagara Mohawk Power Corporation
ATTN: Mr. B. Ralph Sylvia
Executive Vice President
Nuclear Operations
301 Plainfield Road
Syracuse, New York 13212

Gentlemen:

Subject: 10 CFR 50.54(p) SUBMITTAL NINE MILE POINT NUCLEAR STATION

This is in response to your letter of March 30, 1990, regarding changes to the Nine Mile Point Nuclear Station, Unit 1 and 2, Security Training and Qualification Plan, identified as Issue 2, Revision 0.

Based on our review, the enclosed outlines the portions of the plan which are inconsistent with the provisions of 10 CFR 50.54(p). Accordingly, you should follow your previously approved plan in regard to these changes and resubmit corrected plan pages as necessary to maintain plan continuity.

These inconsistencies were discussed on February 5, 1991, between Messrs. D. O'Hara and V. Byrne of your staff and Mr. T. Dexter of this office.

The enclosures to your letter contained Safeguards Information of a type specified in 10 CFR 73.21 and are being withheld from public disclosure.

David Limroth (215-337-5121) is our contact should there be any questions concerning this matter.

Sincerely,
Original Signed By:
James H. Joyner

James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
Division of Radiation Safety
and Safeguards

Enclosure: As stated

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Enclosure

Changes not considered acceptable

<u>Page</u>	<u>Section</u>	<u>Comment</u>
8	3.1	The revision deletes the commitment that requires an individual to "pass an equivalent performance examination designed to measure basic job-related mathematical, language and reasoning skills, ability and knowledge required to perform security job duties" in lieu of a high school diploma and substitutes "pass an equivalent job-related performance evaluation." This is a decrease in the effectiveness of the plan in that it deletes the substance of the equivalent performance evaluation.
19	4.2	This revision deletes the immediacy of retraining/requalification or removal from a position when an individual fails testing on a task crucial for the assignment and substitutes scheduling of retraining and proscribes assignment to the duty until successful requalification is accomplished. The deletion of immediate retraining/requalification and/or removal from the post is a decrease in the effectiveness of the plan.
27	6.0.D	The revision modifies the requirement of 10 CFR 73 Appendix B Criterion V.A.4(a)(3) which specifies 12 rounds each per shotgun (00 gauge and slug) deleting the requirement for slugs. This is a decrease in plan effectiveness.
28	6.0.E	Included in the equipment to be readily available for security force personnel are gas masks. While not addressed within the approved plan, consideration should be given to provision of glasses for use with gas masks for those persons whose vision requirements can only be satisfied through wearing of eye glasses.

cc:

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