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Docket No. 50-461

10CFR73.55

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Compliance with 10CFR73.55(d)(8) During
Outages at Clinton Power Station

Dear Sir or Madam:

The purpose of this letter is to describe the method by which Clinton Power Station (CPS) will comply with the 10CFR73.55(d)(8) requirement to maintain positive access control to the Containment Building during refueling or major maintenance. The contents of this letter have been discussed with Mr. R.F. Skelton, Nuclear Reactor Regulation Safeguards Branch.

According to 10CFR73.55(d)(8), "Any time frequent access is permitted to containment such as during refueling or major maintenance, positive access control to assure that only authorized personnel and materials are permitted into the containment shall be exercised by the licensee, with a guard or watchmen." In order to comply with this regulation in past outages, CPS has posted five to seven security force members (SFMs), depending on the specific evolutions in progress, at all times at CPS containment building entrances. In order to better utilize outage resources while maintaining compliance with 10CFR73.55(d)(8), the following provisions will be exercised.

737' Elevation Fuel Building

Access to the CPS containment is possible through two locations on this elevation of the Fuel Building. Per attachment 1, access is gained through the containment personnel airlock (see location 1) or the containment equipment hatch (see location 2). In order to maintain positive containment access control at location 1, a trained watchman will be stationed in the area bounded by keycard doors 267 and 268. This individual will ensure that all personnel gaining entrance to the Fuel Building through keycard door 267 are in possession of a vital area picture keycard and that only one individual processes through door 267 per door transaction.

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Positive containment access control at the containment equipment hatch area will be accomplished via trained watchmen stationed in the area of the Radiation Protection (RP) building shown on attachment 1. These personnel, as is the case for the containment personnel airlock area, will ensure that all personnel who enter the containment building are in possession of a vital area picture keycard. All personnel who will enter the containment building through this location must process through the RP building before entering containment as shown by the blue flow path arrows on attachment 1.

Access to the 737' elevation of the Fuel Building will be controlled such that access will only be possible through keycard doors 267 or through the RP building. To make this level of control possible, the following provisions will be in place:

- No access to the 737' elevation Fuel Building will be allowed via the stairwell located in the southeast corner of this building (see location 3). A barrier consisting of a chain link type material will be constructed around this stairwell to facilitate positive access control. This barrier is shown on attachment 1 by red cross hatches around the stairwell. This barrier will be provided with an access door which will be maintained locked in the shut position. An access door is necessary for emergency situations should they arise.
- In addition, no access to the 737' elevation Fuel Building will be allowed via the stairwell located in the southwest corner of this building (see location 4). A door key core controlled by CPS Security will be installed in door 326 to allow this door to be locked shut.

Keys for the southeast barrier access door and the southwest stairwell door will be maintained at the RP building by a watchman. These keys will only be used for emergency situations.

One additional barrier similar to the barrier used at the 737' elevation Fuel Building will be constructed to help facilitate positive access control in the area of the RP building. The location of this barrier is shown on attachment 1 by red cross hatches.

Logging of personnel gaining containment access will be accomplished by two methods. If access to containment is gained via keycard door 267, logging will be accomplished by the security computer system. If access to containment is gained via the RP building, logging will be accomplished by the Personnel Radiation Exposure Management (PREM) terminal which will be located in the area directly plant south of the

RP building. In accordance with CPS procedures, all personnel entering containment are required to log into the PREM system. Either method will maintain a record of personnel entering containment.

828' Elevation Control Building

Access to the CPS containment is possible through one location on this elevation of the Control Building. Per attachment 2, access is gained through the containment personnel airlock (see location 5). In order to maintain positive containment access control, a barrier consisting of a chain link type material will be constructed as shown by the red cross hatches on attachment 2, page 2 of 2. This barrier will cause personnel entering containment to process through the RP containment control point as shown by the blue flow path arrows on attachment 2 (Note: egress from containment will be exactly opposite of the ingress route). As is the case with the barrier around the 737' elevation Fuel Building southeast stairwell, an access door will be provided which will be maintained locked in the shut position.

A trained watchman will be present at all times at the RP control point. As is the requirement on the 737' elevation Fuel Building, this watchman will ensure that all personnel gaining access to the containment building be in possession of a vital area picture keycard.

Logging of personnel entering containment at this location will be accomplished via the security computer system. This action will occur when personnel process through keycard door 530 prior to entering the containment personnel airlock (see attachment 2).

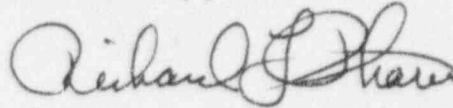
Compensatory measures (i.e., stationing a trained watchman) will be implemented whenever a normally locked barrier/door is opened for emergency purposes or is opened to facilitate CPS outage needs.

The provisions outlined in this letter will be added to the CPS Physical Security Plan (PSP) via a PSP revision performed in accordance with 10CFR50.54(p). These provisions will remain in the CPS PSP and will be utilized for major plant outages (i.e., refueling outages) until such time that 10CFR73.55(d)(8) requirements are revised or deleted.

The provisions described in this letter to implement positive access control to the CPS containment building during periods of frequent access maintain compliance with the requirements of 10CFR73.55. These provisions also allow Illinois Power (IP) to better utilize available outage resources in the most economical manner possible given current regulatory requirements.

Please contact me should there be any questions concerning the contents of this letter.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Richard F. Phares".

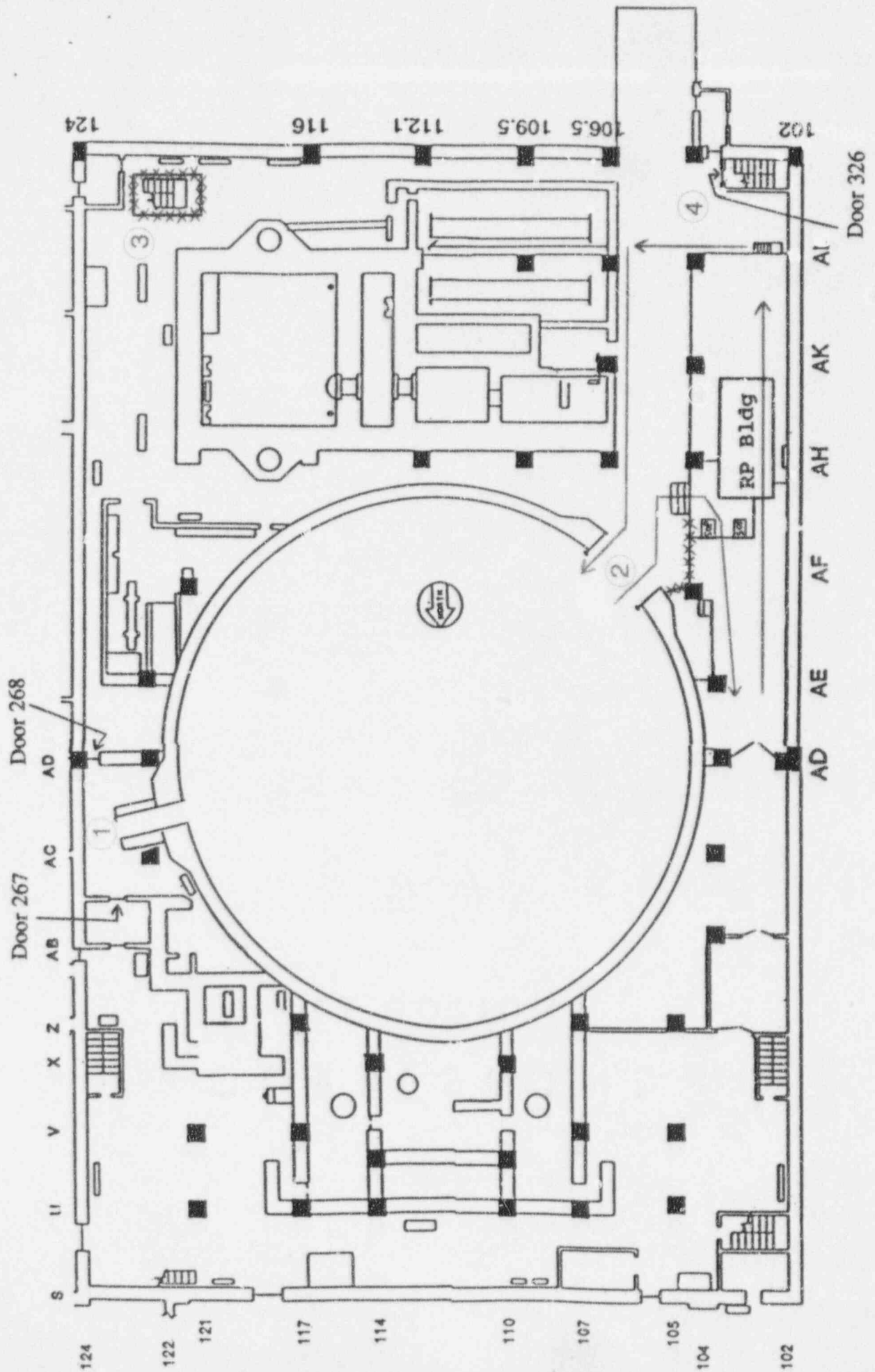
Richard F. Phares
Director, Licensing

MAR/csm

Attachments

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

737' Elevation Auxiliary/Fuel Building



825' Elevation Control Building

828' Elevation Containment

