

MAY - 9 1991

Docket Nos. 50-275 and 50-323

Pacific Gas and Electric Company  
77 Beale Street, Room 1451  
San Francisco, California 94106

Attention: G. M. Rueger  
Senior Vice President and General Manager  
Nuclear Power Generation Business Unit

This acknowledges the receipt of J. D. Shiffer's letter dated July 23, 1991 (DCL-91-185), and your letter of January 17, 1992 (DCL-92-004), by which PG&E transmitted Changes 7 and 8, respectively, to Revision 17 to the Diablo Canyon Power Plant Physical Security Plan, dated March 1974, and your letter dated April 17, 1992 (DCL-92-089), certifying your compliance with 10 CFR 73.56.

We have determined that certain portions of these changes are consistent with the provisions of 10 CFR Part 50.54(p). However, as indicated in the enclosure to this letter, certain of the changes are inconsistent with the provisions of 10 CFR 73.56 and thus are not acceptable. We understand, based upon recent conversations between L. Fisher of your staff and N. Ervin of the NRC's Office of Nuclear Reactor Regulation, that you intend to submit a further change to clarify your plan commitments. Accordingly, with the exception of the change identified in the enclosure, the changes included in Change 7 and 8 to Revision 17 are acceptable for inclusion in the plan.

If you have any questions concerning this matter, please contact L. Norderhaug of this office at (510) 975-0243.

Sincerely,

*(Signature)*

Ross A. Scarano, Director  
Division of Radiation Safety  
and Safeguards

Enclosure: As Stated

DISTRIBUTION:

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- P. Morrill, Acting NRC Resident Inspector
- P. McKee, Chief, RSGB, NRR
- N. Ervin, PDRS, NRR
- NRR Docket File
- L. Norderhaug, RV
- Central Files, RV

RV/cb *Star 42* *nos*  
LNorderhaug *J Reese*

RScarano *5/9/92*

REQUEST COPY	REQUEST COPY	REQUEST COPY	SEND TO PDR
YES / NO	YES / NO	YES / NO	YES / NO
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ENCLOSURE

Docket No: 50-275

Comments on Diablo Canyon Power Plant -- Security Plan

<u>Page</u>	<u>Section</u>	<u>Comment</u>
1-3 & App. E	1.3	<p>This change includes an "endorsement" of the provisions of Regulatory Guide 5.66 incorporated into the text of a section titled "Facility Personnel" and eliminates Appendix E "Personnel Screening for Unescorted Security Access".</p> <p>By including the endorsement within the section titled "Facility Personnel", the endorsement could potentially be construed as being limited to licensee personnel. The endorsement further refers only to the licensee's "personnel screening" program -- as meeting the requirements of 10 CFR 73.56 and Regulatory Guide 5.66. Other facets of the access authorization program, such as access authorization revocation, devitalization of equipment or areas, records retention and audits, are discussed elsewhere -- without a similar endorsement.</p>

G. M. Rueger  
Pacific Gas and Electric Company

Diablo Canyon

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