

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555



4

[REDACTED]

MEMORANDUM FOR: Cecil O. Thomas, Chief
Standardization & Special Projects Branch
Division of Licensing

THRU: Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

FROM: Daniel G. McDonald, Project Manager
Operating Reactors Branch No. 1
Division of Licensing

SUBJECT: COMMENTS ON REGULATORY EFFECTIVENESS REVIEW AND
VITAL AREA VALIDATION - TURKEY POINT PLANT UNITS
3 AND 4

As Project Manager for Turkey Point Plant Units 3 and 4, I participated in the Safeguards Regulatory Effectiveness Review (RER) and Vital Area Validation (VAV) at the Turkey Point Site from May 23 through May 27, 1983. I have been provided copies of the RER and VAV reports and have been requested to provide comments.

By letter dated May 12, 1983, we informed the licensee of our proposed visit and purpose. The purpose, as stated in our letter, was to determine whether existing safeguard regulations yield the level of protection intended by the NRC. In addition, it should be noted that the licensee has an approved security plan. I assume this plan provides a level of safeguards adequate to meet the Regulations as provided in 10 CFR Part 73. However, the RER report identifies several concerns of sufficient significance indicating the need for prompt remedial action.

The report, as written, infers that the licensee is required to take prompt remedial action to correct the several items (seven pages) identified as significant concerns. However, there appears to be no regulatory basis from which to require the changes. The RER program appears to be a backfit/ratchett to the operating plants with approved security plans. Little mention of the NRC approved site security plan is made. The concerns appear to be based on the judgement of the team rather than written criteria.

The following are specific comments on the RER Report by Section:

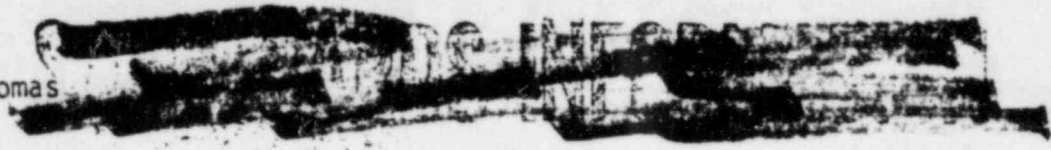
1.0 Overview

The main objective is not consistent with the objectives stated in our letter dated May 12, 1983. The level of protection intended by NRC, as expressed in 10 CFR Part 73, are met by the licensee based on the NRC-approved site security plan. If this

8412170382 840430
PDR FOIA
SHOLLY83-531 PDR

[REDACTED]

Cecil O. Thomas



is not true then the Commission should consider an expedited mechanism for upgrading the existing NRC approved security plans for the operating plants on a timely and consistent basis.

1.1 Site Characteristics

The ultimate heat sink is not Biscayne Bay. The ultimate heat sink is the Closed Cycle Cooling Canals.

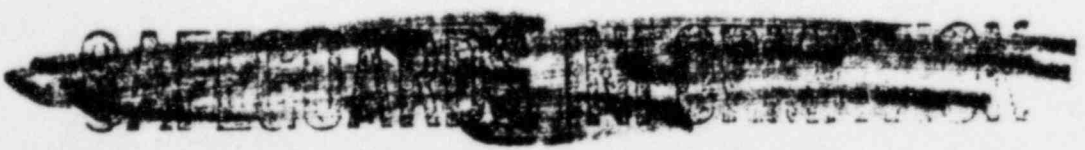
2.1 Potential Sabotage Vulnerabilities

No comment.

2.2 Safeguards Program Concerns

2.2.1 Perimeter Detection System & Barrier

2.2.2 Vital Area Barrier Integrity



2.2.3 Maintenance of Security Equipment

The general comments on Section 2.2.1 are applicable.

2.3 General Observations

No comments.


2.4 Notable Safeguards Strengths

No comments.

2.5 Safety/Safeguards Interface Review

The comments from Auxiliary Systems and Procedures & Systems Review Branches, who were represented during this RER/VAV effort, will address this area in detail. The review of the safety/safeguards interface appears not to be based on analyzed conflicts. General statements relating to coordination of operations and security are made and that safe operation of the plant is paramount during emergency or off-normal conditions. No detailed operating or security procedures were reviewed during the RER effort to determine if specific conflicts exist.

There was no coordinated effort with NRR prior to the RER/VAV site review. The reports indicate the team expended considerable effort in preparation for the site review. However, the NRR representatives were not included in this preparation. Specifically, the NRR Technical Review Branches had no input on the adequacy of the safety/safeguards interface portion of the review or the adequacy of the Los Alamos VAV studies. Based on the report, it cannot be determined if current modifications have been considered in the Los Alamos studies and factored into the RER/VAV review.



Cecil O. Thomas

2.6 Reduction of Safeguards Regulatory Review

No comments.

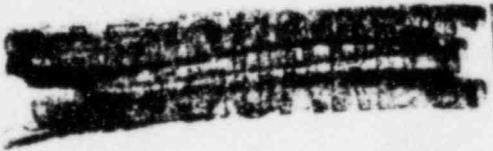
Attachment 1

This background document appears to be inconsistent with the findings of the report as identified by the comments provided above. In addition, it is stated that after a number of these reviews if the level of protection intended is not met or the requirements are misinterpreted or misunderstood, then specific improvements in the regulations and NRC guidance will be suggested.

I am not sure how many of these reviews are necessary to make this determination.

The following might be considered in assessing the continuation of the program as presently conceived:

- 1) The NMSS Review Team consisted of seven members for one week which did not include their preparation time. Three NRR staff members were included for the week, or portion of the week, with no specific participation or involvement. NRR was not included in the preparation effort. I&E had one or two staff members involved for a portion of review. They also had no specific participation and were not included in the preparation. Attachment 1 to this memo identifies all the people attending entrance and exit briefing to provide an assessment of the impact on the NRC Staff and the Licensee. The time and resources to continue this effort, both NRC and Licensees, should be considered.
- 2) As previously stated, the findings of no potential sabotage vulnerabilities and the identification of the need for prompt remedial action based on the report are contradictory and appear to be a mechanism for backfit/ratcheting of an NRC-approved security plan. This is an inconsistent, expensive (both in people and time) and subjective method to achieve upgrading.
- 3) An alternative plan should be considered to identify weaknesses in existing approved security plans and establish minimum criteria necessary for all security plans. One alternate mechanism to achieve this would be to utilize the information gained by the current RER/VAV effort to date, combined with detailed input from the Regional Safety/Safeguards inspection effort to establish the minimum requirements. The results would include value/impact assessments and the necessary CRGR approvals. This or a similar method would provide a significant savings in resources and a more timely upgrading of existing approved security plans if necessary.


Daniel G. McDonald, Project Manager
Operating Reactors Branch No. 1
Division of Licensing

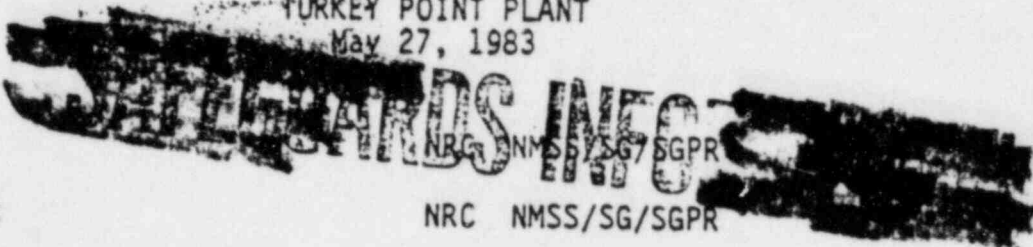
Attachment:
As stated

SAFEGUARDS REGULATORY EFFECTIVENESS REVIEW
TURKEY POINT PLANT
ENTRANCE BRIEFING - 5/23/83-9AM

H. E. YAEGER	SITE MANAGER
J. W. KAPRES	I & C SUPERVISOR
W. R. WILLIAMS	ASST SUPT ELECT NUC.
T. A. FINN	OPER SUPV ACT.
D. W. JONES	QC SUPERVISOR
R. G. ESPOSITO	T W C
C. C. CROTHERS	T W C
M. A. BARRY	T W C
L. A. PICKENS	T W C
R. E. GARRETT	FPL SITE SECURITY
D. T. HUNT	FPL SITE SECURITY
J. D. POPE	N R C
NICK PARADISO	N R C
JOHN SOMERINDYKE	N R C
JOHN G. WEST	FPL ST. LUCIE SECURITY
FRANK H. FABOR JR.	FPL CORP. SECURITY
DAVID E. MOORE	US NRC REGION II
RENE VOGT-LOWELL	NRC RESIDENT INSPECTOR
DOUG KUNZE	NRC/NMSS/SG/SGPR
LIZ QUINN	NRC/NMSS/SGPR
JOHN HOCKERT	NRC/NMSS/SGPR
BARRY MENDELSON	NRC/NMSS/SGPR
DANIEL G. MCDONALD	NRC/NRR/DL



EXIT BRIEFING
TURKEY POINT PLANT
May 27, 1983



Doug Kunze	NRC NMSS/SG/SGPR
John Hockert	NRC NMSS/SG/SGPR
Liz Quinn	NRC NMSS/SG/SGPR
Barry T. Mendelsohn	NRC NMSS/SGPR
Vene Vogt-Lowell	NRC Turkey Point Resident Inspector
D. E. Moore	NRC/R-II
D. R. McGuire	NRC/R-II
D. W. Jones	FP&L - QC Supv
T. A. Finn	FP&L - Oper Supv Nuc(Act)
J. K. Hays	FP&L - Plant Manager - Nuclear
H. E. Yaeger	FP&L - Site Manager
R. E. Garrett	FP&L - Security
D. T. Hunt	FP&L - Security
R. G. Esposito	TWC
S. C. Hawley	TWC
D. O. Davis	TWC
C. F. Wheeler	Virginia Electric & Power Co.
D. B. Roth	Virginia Electric & Power Co.
John Somerindyke	NRC
Jack Pope	NRC
Nick Paradiso	NRC NMSS/SG/SGPR
Nick Fioravante	NRC/NRR/DSI/ASB
Dan McDonald	NRC/NRR/DL
Don Kasun	NRC/NMSS/SG
John Hockert	NRC/NMSS/SGPR

~~CONFIDENTIAL~~ (5)

Richard A. Uderitz
Vice President -
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 935-6010

March 23, 1983

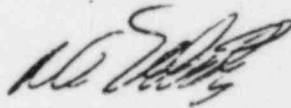
Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Varga:

NRC LETTER DOCKET NO. 50-272, DATED FEBRUARY 24, 1983
RE: REGULATORY EFFECTIVENESS REVIEW

The comments requested relative to the areas of concern identified in Section 2.2 of the attachment to subject letter are provided in Enclosure 1. As stated in the enclosure, PSE&G had previously identified most items of concern and had initiated corrective actions. All concerns have been addressed in a positive and effective manner consistent with the ongoing policy to optimize the performance of our nuclear security program. The contributions of the review team to this effort are sincerely appreciated.

Sincerely,



CC. Ronald C. Haynes
Regional Administrator - Region I
U.S. N.R.C.

NRC Resident Inspector
Salem Generating Station

* 5001
1/6

~~WHEN SEPARATED FROM ENCLOSURES
THIS DOCUMENT IS UNCONTROLLED~~

8303290437 830323
PDR ADOCK 05000272
F PDR

~~CONFIDENTIAL INFORMATION~~

~~CONFIDENTIAL INFORMATION~~

ENCLOSURE

50-272/311

COMMENTS ON PUBLIC SERVICE ELECTRIC AND GAS COMPANY'S
RESPONSE TO THE SAFEGUARDS REGULATORY EFFECTIVENESS
REVIEW REPORT OF FEBRUARY 24, 1983

<u>ITEM</u>	<u>REPORT SECTION</u>	<u>COMMENT</u>
1.	2.2.1	

2.	2.2.4	
----	-------	--

~~CONFIDENTIAL INFORMATION~~



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

JUL 19 1983

Here (circled)

Docket Nos. 50-272/311

Mr. R. A. Uderitz
Vice President - Nuclear
Public Service Electric and Gas Company
P. O. Box 236
Hancocks Bridge, New Jersey 08038

file

Dear Mr. Uderitz:

Subject: Request for Additional Information on the Regulatory Effectiveness Review Report for Salem, Units 1 and 2

This is in response to your letter of March 23, 1983 which transmitted Public Service Electric and Gas Company's response to the Safeguards Regulatory Effectiveness Review Report dated February 24, 1983.

We have reviewed your responses and have determined that two items still require further consideration and resolution. Our comments on these items are enclosed. Please provide your response on the first item within 30 days of receipt of this letter.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

The enclosures to your letter contain Safeguards Information of a type specified in 10 CFR 73.21 and are being withheld from public disclosure. The enclosure to this letter also contains Safeguards Information and should be protected against unauthorized disclosure.

Sincerely,

Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing

Enclosure:
Comments

cc: w/o enclosure
See next page

8507220423

JUL 19 1963

cc: Mark J. Wetterhahn, Esquire
Conner and Wetterhahn
Suite 1050
1747 Pennsylvania Avenue, NW
Washington, D. C. 20006

Richard Fryling, Jr., Esquire
Assistant General Solicitor
Public Service Electric and Gas Company
Mail Code T5E - P.O. Box 570
Newark, New Jersey 07101

Gene Fisher, Bureau of Chief
Bureau of Radiation Protection
380 Scotch Road
Trenton, New Jersey 08628

Mr. R. L. Mittl, General Manager
Nuclear Assurance and Regulation
Public Service Electric and Gas
Company
Mail Code T16D - P.O. Box 570
Newark, New Jersey 07101

Mr. Henry J. Midura, Manager
Salem Operations
Public Service Electric and Gas
Company
P. O. Box E
Hancocks Bridge, New Jersey 08038

Leif J. Norrholm, Resident Inspector
Salem Nuclear Generating Station
U. S. Nuclear Regulatory Commission
Drawer I
Hancocks Bridge, New Jersey 08038

Mr. Edwin A. Liden, Manager -
Nuclear Licensing
Public Service Electric and
Gas Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Regional Administrator - Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Mr. Charles P. Johnson
Assistant to Vice President - Nuclear
Public Service Electric and Gas Company
P.O. Box 570
80 Park Plaza - 15A
Newark, New Jersey 07101

UNION OF CONCERNED SCIENTISTS

1346 Connecticut Avenue, N.W. • S. 1101 • Washington, DC 20036 • (202) 296-5600

8 September 1983

Mr. J. M. Felton, Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

**FREEDOM OF INFORMATION
ACT REQUEST**

FOIA-83-531

Rec'd 9-9-83

Dear Mr. Felton:

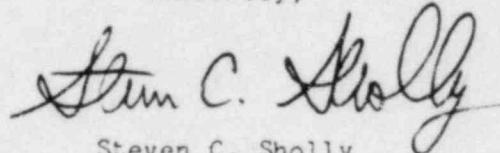
Pursuant to the Freedom of Information Act, please make available at the Commission's Washington, D.C., Public Document Room copies of the following documents:

1. SAND76-0314, B. L. Hulme, "Pathfinding in Graph-Theoretic Sabotage Models", July 1976, several volumes.
2. SAND75-0595, B. L. Hulme, "Graph-Theoretic Models of Theft Problems", November 1975, several volumes.
3. SAND75-6159, L. D. Chapman, "Effectiveness Evaluation of Alternative Fixed-Site Safeguard Security Systems", July 1976.
4. SAND75-0658, H. A. Bennett, "Dynamic Model of A Terrorist Attack", February 1976.
5. SAND77-0644, NUREG/CR-0313, G. Varnado, et al., "Reactor Safeguards System Assessment and Design, Volume II".
6. Documents concerning "Regulatory Effectiveness Reviews", including the charter for organizations performing such reviews and the results of all such reviews performed since 1/1/81.
7. "Power Reactors, 81100 Series", prepared for the Office of Inspection and Enforcement by Lawrence Livermore Laboratory.
8. Documents concerning the establishment and operation of an organization known as the "Safety Interface Group" within the Office of Nuclear Reactor Regulation, including minutes of all meetings held by the group since 1/1/81.
9. Documents concerning "Safeguards Incident Reports" or "Safeguards Event Reports", including reporting requirements, and copies of all such reports since 1/1/81.

10. SAND77-0043, D. D. Boozer and D. Engi, "Insider Safeguards Effectiveness Model (ISEM): Sandia User's Guide".
11. SAND76-0682, D. D. Boozer and D. Engi, "Simulation of Personnel Control Systems with the Insider Safeguards Effectiveness Model (ISEM)", April 1977.
12. Updates since 10/1/77 to SAND77-0777, "Barrier Technology Handbook".
13. SAND77-1367, L. D. Chapman, et al., "User's Guide for Evaluating Alternative Fixed-Site Physical Protection Systems Using FESEM", November 1977.
14. SAND77-04106, D. Engi and D. D. Boozer, "The Use of ISEM in Studying the Impact of Guard Tactics on Facility Safeguards System Effectiveness", July 1977.
15. SAND77-1130, G. W. Dyckes, "Development of Explosive Resistant Walls".
16. SAND76-0218, D. W. Bauder, "Concepts for Increasing the Penetration Resistance of Facilities", May 1976.

Should you or your staff have any questions regarding this request, please do not hesitate to contact me at the Washington, D.C. office of UCS. Partial responses to this request will be appreciated in the event of delays in locating and/or reviewing one or more of the requested documents.

Sincerely,



Steven C. Sholly
Technical Research Associate