

JUL 10 1992

Docket No.: 50-271

Serial No.: 92-524

Mr. L. A. Trembly
Senior Licensing Engineer
Vermont Yankee Atomic Power Corp.
580 Main Street
Folton, Massachusetts 01740-1398

Dear Mr. Trembly:

SUBJECT: 10 CFR 50.54(p) SUBMITTAL FOR VERMONT YANKEE NUCLEAR
POWER CORPORATION

This letter is in response to your correspondence of May 8, 1992, regarding changes to the Vermont Yankee Physical Security Plan identified as Revision 22.

We have reviewed the changes submitted and have determined that they are consistent with the provisions of 10 CFR 50.54(p), and are acceptable for inclusion in the Plan with the following exceptions:

The commitment, "(P)lant procedures shall include criteria for determining whether or not a legitimate need for access exists," has been omitted from paragraph 1.6.3 (page 1-14, rev. 22) which incorporated commitments from the earlier paragraph 1.6.3 (page 1-23, rev. 18). This is considered a degradation. You should follow your previously approved Plan with respect to this change and submit corrected Plan pages as necessary that reinstate this commitment.

Paragraph 1.6.1 (page 1-12, rev. 22) satisfies the requirements of 10 CFR 73.56 with the understanding that the term "screened" is applied in its broadest sense and includes the continuous observation program. This paragraph should be modified in a future revision in order to clarify this apparently limited commitment.

Similarly, paragraph 13.7.f (page 13-3, rev. 22) commits to the retention of "screening" records for a period of five years following the individual's term of employment. This is satisfactory with the understanding that "screening" incorporates all records associated with the access authorization program. (As a related matter, your attention is invited to 10 CFR 73.56(h)(1) which requires that each licensee who denies an individual unescorted access shall retain the records on which the denial is based for five years).

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Paragraph 14.1.2 (page 14-1, rev. 22) correctly specifies a 24-month periodicity for access authorization program audits; however, the requirement that an audit be conducted within 12 months of the effective date of program implementation has not been addressed. Whether addressed in the Plan or not, this requirement must be satisfied.

It should be noted that the comments regarding the access authorization program could be resolved by the insertion of a statement such as recommended in Regulatory Guide 5.66, paragraph C.2 under a caption such as "Access Authorization Program" and deletion of all other material which might address the program.

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

Should there be any questions concerning this matter, please contact the reviewer, Mr. David Limroth (215-337-5421).

Sincerely,

**Original Signed By:
James H. Joyner**

James H. Joyner, Chief
Facilities Radiological Safety
and Safeguards Branch
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cc:

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