



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

January 31, 1984

50-250
50-251

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

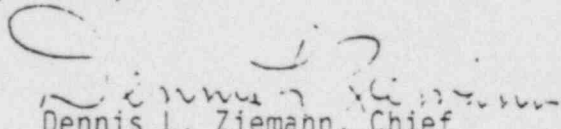
FROM: Dennis L. Ziemann, Chief
Procedures and Systems Review Branch
Division of Human Factors Safety

SUBJECT: COMMENTS ON REVISED REGULATORY EFFECTIVENESS REVIEW
REPORT FOR TURKEY POINT NUCLEAR POWER STATION UNITS
3 AND 4

In response to your January 25, 1984 memorandum to Brent Clayton, we have reviewed the subject report to determine how our previous comments were addressed. We note that our recommendations to remove the explanation of the RER from the body of the report and to provide comments assessing the effectiveness of the staff's program for ensuring adequate safeguards have been implemented. However, our other major comment concerning the regulatory basis from which to require or suggest plant changes is not addressed. Our suggestion is that the results of the team's review should first be compared with the site's NRC-approved security plan. Weaknesses would then be identified either as security plan implementation deficiencies or as NRC problems with the security plan. The implementation problems are the utility's responsibility. Identification of these problems could be provided by letter to the utility. The acceptance problems are our responsibility and our review criteria should be evaluated, corrected, if necessary, and backfitting considered for the plant.

As an editorial comment, it is recommended that rather than preparing two 30 page documents identifying the vital areas (one for each unit), one document of about 30 pages for the two units should be sufficient.

If discussion of these comments is necessary, please contact W. G. Kennedy, Senior Operational Safety Engineer (X24578).


Dennis L. Ziemann, Chief
Procedures and Systems Review Branch
Division of Human Factors Safety

cc: D. McDonald
E. McPeck

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