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61 FR 16016
April 10, 1996

(3)

RECEIVED

June 17, 1996
RC-96-0154

1996 JUN 20 PM 3:10
RULES REVIEW & DIR. BR.
USNRC

Rules Review and Directives Branch
DFIPS
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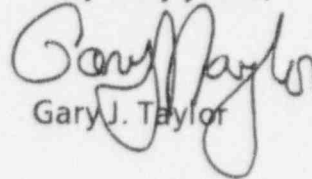
Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON DRAFT REGULATORY GUIDE
DG-5007

Gentlemen:

South Carolina Electric & Gas (SCE&G) submits the attached comments on Draft Regulatory Guide, DG-5007, Proposed Revision 3 to Regulatory Guide 5.44, in response to the Nuclear Regulatory Commission's (NRC) request published in the Federal Register (61 Fed. Reg. 16016 April 10, 1996).

South Carolina Electric & Gas appreciates the opportunity to provide comment on this draft regulatory guide. If you have any questions concerning these comments please call Mr. Ricky Myers, at (803) 345-4384.

Very truly yours,



Gary J. Taylor

RAM:ews
Attachment

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Section 1.2, Detection and Alarm Capabilities,

"the design goal of a perimeter intrusion detection system should be to limit false alarms and nuisance alarms to a total of not more than one false alarm per zone per day and one nuisance alarm per zone per day."

Comment:

While this is a good design goal actual system performance may not meet this goal and the NRC should not make this an operational requirement. Licensees should have the flexibility to establish the operable requirements of site specific false and nuisance alarm rates independent of the requirements to submit a security plan revision under the provisions of 10 CFR 50.54(p) as described in this section.

"Licensees should be able to observe, in a timely manner, the bridging of a detection zone or to justify that successful completion of a bridging attempt is not feasible."

Comment:

The term "in a timely manner" is too vague and is left to the interpreter's discretion. The alternative option to prove that bridging is "not feasible" is not reasonable. This paragraph presents a new requirement placing additional burden upon a licensee and should be subjected to a rulemaking if deemed necessary.

"The system should be designed to annunciate, audibly and visibly, under the following additional conditions:..."

Comment:

The requirement for audible and visible annunciation is new. This would require a backfit and needs to be addressed by a rulemaking if deemed necessary. The paragraph should prescribe audible or visible annunciation.

Section 1.7, Assessment,

"The time an intruder takes to run through the isolation zones and disappear from the field of view of the assessment mechanism should be greater than the time required to visually acquire and evaluate the alarm information."

Comment:

The time to evaluate the alarm information is largely dependant upon the circumstances and make this item too restrictive. An evaluation implies that a through study and understanding has been achieved. This paragraph should be revised to ...time required to visually assess the alarmed zone(s).

Section 1.7.2, Fixed guard posts...

Comment:

This section places new and unnecessarily restrictive requirements on a licensee. A fixed guard post is not defined. It is not certain from the Draft Regulatory Guide if this section may be applied to guard posts set up as a compensatory measure taken upon the loss of a portion of the intrusion detection system. This section assumes that a posted guard can only effectively monitor in a single direction. This is not appropriate and poses expectations that may dull the senses of a posted guard who is not allowed to look either right or left but must focus full attention in a single direction. This section should be deleted.

Section 2.1.1, Installation Criteria, (under 2.1 Microwave Systems)

"Receiver units for a microwave link may also need to be specially protected because of their susceptibility to tampering by a knowledgeable intruder or to "receiver capture" through electronic means.

Comment:

The word "may" leaves this sentence open to interpretation. The section should better define when a system is deemed susceptible to tampering. The perceived susceptibility to "tampering by a knowledgeable intruder" is a new concept. Protection of receiver units to "knowledgeable intruders" places a new burden on licensees which may require a backfit and should require a rulemaking.

"...the distance between a chain link security fence with an overall height of 2.4 meters (8 feet) and the center of the microwave beam should be a minimum of 2.4 meters (8 feet)."

Comment:

A prescribed distance from the chain link fence for the center of the microwave beam was first required by Rev.2 of Regulatory Guide 5.44. Rev.2 prescribed 2 meters as the distance for the center of the microwave beam to be from the chain link security fence. The proposed Rev. 3 will prescribe

a new distance of 2.4 meters. This is a new burden to licensees which may require a backfit and should be subject of a rulemaking.

Appendix A, Glossary,

"Bridging Circumvention of a perimeter detection system by traversing above the zone of detection."

Comment:

As discussed under section 1.2 above the concept of bridging is new and should be addressed under a rulemaking. How far above a detection zone is a licensee expected to be able to observe? This definition does not provide sufficient detail to the licensee. Remove this definition along with the applicable portion of section 1.2.

"Crawling ...at an approximate velocity of 0.03 meter (1 inch) per second..."

Comment:

The speed of crawling was previously established as 1.5 meters per second (Rev 2 of Regulatory Guide 5.44). This change has not been justified and represent a potential backfit requirement. Leave the speed set at a velocity of 1.5 meters per second.

"Jumping Leaping over the zone of detection, including standing on a fence and attempting to leap across the zone of detection."

Comment:

As defined, jumping may be included in the previously defined term of bridging. Jumping should be clarified to mean unassisted.

"Operational testing Testing performed at the beginning and the end of any period in which a system is used." (underline added)

Comment:

Testing performed prior to the end of a period in which a system is used does not provide the licensee with useful data and is an unnecessary burden. Remove the prescribed testing prior to removing a system from use.

"Rolling ...moving at an approximate velocity of 0.3 meter (1 inch) per second."

Comment:

The speed of rolling was previously established as 1.5 meters per second (Rev 2 of Regulatory Guide 5.44). This change has not been justified and represent a potential backfit requirement. Leave the speed set at a velocity of 1.5 meters per second.

Appendix B, Checklist,

"Never mount two microwave receivers on the same post."

Comment:

This is a requirement not otherwise discussed within the text of the regulatory guide. This is a new requirement and has not been justified. This item would require a backfit and should be the subject of a rulemaking. As a checklist, new and additional requirements should not be contained in Appendix B.