



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

SAFEGUARDS EVALUATION REPORT  
MISCELLANEOUS AMENDMENTS AND SEARCH REQUIREMENTS  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

### 1.0 Introduction

The Philadelphia Electric Company (PECO) has filed with the Nuclear Regulatory Commission revisions to their Physical Security Plan for the Limerick Generating Station, Units 1 and 2.

This Safeguards Evaluation Report (SGER) summarizes how the licensee proposes to meet the Miscellaneous Amendments and Search Requirements revisions of 10 CFR Part 73.55.

Based on a review of the Physical Security Plan, the staff has concluded that the proposed changes satisfy Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and accompanying 10 CFR 73.70 record reporting requirements. Accordingly, the protection provided will ensure that the public health and safety will not be endangered.

### 2.0 Personnel Search

The licensee has provided commitments in the Physical Security Plan to provide a search of all individuals entering the protected area except bona fide Federal, State and local law enforcement personnel on official duty, through the use of equipment designed for the detection of firearms, explosives, and incendiary devices. In addition, the licensee has provided commitments to conduct a physical pat-down search of an individual whenever the licensee has cause to suspect that the individual is attempting to introduce firearms, explosives, or incendiary devices into the protected areas; or whenever firearms or explosives detection equipment is out of service or not operating satisfactorily.

### 3.0 Vital Area Access

PECO has modified their Limerick Generating Station, Units 1 and 2, Physical Security Plan to limit unescorted access to vital areas during non-emergency conditions to individuals who require access in order to perform their duties. They have established current authorized access lists for each vital area which are updated and approved by the cognizant manager or supervisor at least once every 31 days. PECO has assured that only individuals whose specific duties require access to vital areas during non-emergency conditions are included on their site access list. PECO has

provided further assurance by revoking access and retrieving badges and other entry devices prior to or simultaneously with notification of termination of an individual's unescorted facility access.

Based upon commitments made by the licensee in revisions to their Physical Security Plan, the staff has concluded that PECO meets the vital area access requirements of 10 CFR 73.55(d)(7)(i)(A)(B) and (C).

#### 4.0 Locks and Keys

The licensee has committed to providing methods to reduce the probability of compromise of keys, locks, combinations, and related access control devices used to control access to their protected areas and vital areas. These methods include the rotation of keys, locks, combinations, and related access control devices every 12 months or the changing of these devices whenever there is evidence or suspicion that any key, lock, combination or related access control device may have been compromised or when an individual who has had access to any of these devices has had their access terminated due to a lack of trustworthiness, reliability or inadequate work performance. Only persons granted unescorted facility access are issued such entry devices.

Based upon commitments made by the licensee in revisions to their Physical Security Plan, the staff has concluded that PECO meets the requirements of 10 CFR 73.55 (d)(7) to reduce the probability of compromise of keys, locks, combinations, and related access control devices.

#### 5.0 Emergency Access

The licensee has provided commitments to provide for the rapid ingress and egress of individuals during emergency conditions or situations that could lead to emergency conditions by assuring prompt access to vital equipment. An annual review of their physical security plans and contingency plans and procedures will be conducted to evaluate their potential impact on plant and personnel safety. Emergency access is granted by a licensed senior operator.

Based upon commitments made by the licensee in revisions to their Physical Security Plan, the staff has concluded that PECO meets the requirements of 10 CFR 73.55 (d)(7)(ii)(B) to assure access to vital equipment during emergencies or to situations that may lead to an emergency.

#### 6.0 Protection of Secondary Power Supplies

The licensee has provided commitments to protect the on-site secondary power supply system for alarm annunciator equipment and non-portable communications equipment by including such equipment within a vital area boundary.

Based upon commitments made by the licensee in revisions to their Physical Security Plan, the staff has concluded that PECO meets the requirements of 10 CFR 73.55(e) in protecting the secondary power supplies of alarm annunciator equipment and non-portable communications equipment.

#### 7.0 Vital Area Entry/Exit Logging

The licensee has committed to maintaining a log indicating name, badge number, time of entry, and time of exit of all individuals granted access to a vital area except those individuals entering or exiting the reactor control room.

Based upon commitments made by the licensee in revisions to their Physical Security Plan, the staff has concluded that PECO meets the requirements of 10 CFR 73.70(d) by maintaining entry/exit log of individuals accessing vital areas (except the reactor control room).

#### 8.0 Conclusion

Based upon the above evaluation, we find that the licensee has met the requirements of the Miscellaneous Amendments and Search Requirements revision to 10 CFR Part 73.55 and the record reporting requirements of 10 CFR Part 73.70.

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Dated: August 3, 1988