



DOCKET NUMBER PR-50
PROPOSED RULE
(53 FR 8924)

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April 18, 1988

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Comments on Proposed Rule, 10 CFR 50.70 Licensee
Announcements of Inspectors

Gentlemen:

The following comments concern the subject proposed rule which would grant NRC inspectors immediate and unannounced access to licensed facilities, thus avoiding advanced notification of the inspection to licensee personnel.

The intent of the rule is understandable, but the potential for unintentional violation, as the rule is written, is excessive and therefore probably unenforceable. Such a blanket prohibition against employee intercommunication is extremely unrealistic. It is impractical to "ensure" that such communications will not occur, thereby creating potential enforcement for circumstances completely outside a licensee's control. Security personnel are trained to take note of persons who enter the plant that are not employees or contractors, and to inform security supervision of each such occurrence. This rule will force them to act against an ingrained set of purposeful principles. Further, the burden of licensees having to maintain a code of silence for its employees does not lend itself easily to the safe and efficient operation of a nuclear power plant. It is easy to foresee instances where Control Room efficiency, for example, could be compromised by such a prohibition.

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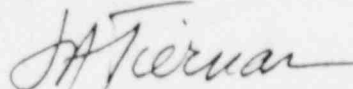
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We recommend against this type of regulatory initiative. If imposed, however, at least three changes are recommended:

1. The rule should only be in effect for a specified duration after arrival. This duration should be on the order of two hours.
2. If the inspector wants to conduct an inspection without people being aware of his presence, he should inform each licensee employee or contractor he contacts that the inspection is to be conducted confidentially in accordance with NRC regulations. This way the normal inspection, which does not require any secrecy, can be done with normal processes. Otherwise, efforts to accommodate and support inspectors will constantly be hindered by the confusion over whether or not the inspector has specifically requested to have his presence communicated.
3. The rule must clearly reflect that in no instance may the imposition of such a rule interfere with safe operations.

We appreciate the opportunity to comment. Should you have any questions regarding these comments, we will be pleased to discuss them with you.

Very truly yours,



JAT/DLS/dlm

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