



# Nebraska Public Power District

GENERAL OFFICE  
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January 13, 1988

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

- Reference: 1. Letter from L. J. Callahan, NRC Region IV, to G. A. Trevors dated December 2, 1987
2. Docket 50-298

Subject: Security Upgrade Project at Cooper Nuclear Station

Reference 1 documented a meeting held between U.S. NRC Region IV and Nebraska Public Power District personnel on the subject activity. Reference 1 also listed three items which required further clarification. This letter is in response to that request. For clarity, the question is repeated followed immediately by the District's response.

Question 1:

Region IV has confirmed with the NRR staff in headquarters that Amendment 111 to the Cooper Nuclear Station Facility Operating License authorized the modification to the closed circuit television (CCTV) system as you described in the meeting. This does not relieve NPPD of the responsibility to monitor the outer isolation zone in accordance with 10CFR73.55(c)(5), and we request that you provide to Region IV a description of how NPPD intends to monitor the outer isolation zone.

Response:

The District recognizes the regulatory requirements contained in the applicable sections of 10CFR73. As such, the perimeter at Cooper Nuclear Station was surveyed and assessed for the application of intrusion detection equipment, illumination devices, and closed circuit television equipment. As part of the survey and assessment, existing NRC Rules and Regulations, and associated guidance were considered as discussed below.

- o Paragraph 10CFR73.55(c)(5) requires light levels which allow the security force to readily see outdoor areas at night either by CCTV or direct visual observation. NPPD has recently designed and installed an enhanced lighting system that meets the minimum illumination levels.

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specified, and will be compatible with the upgraded CCTV equipment and direct visual observation. Paragraph 10CFR73.55(c)(5) goes on to reference other paragraphs in the rule.

- o Paragraph 10CFR73.55(c)(3) requires isolation zones on either side of the protected area (PA) barrier that permit observation under specific circumstances (i.e., barrier penetration). The perimeter concept, as specified in the CNS Physical Security Plan, calls for 20 foot clear areas (isolation zones) on either side of the PA barrier where practicable. Where this criteria could not be fully met, additional equipment will be applied to compensate.
- o Paragraph 10CFR73.55(c)(4) requires that exterior areas be periodically checked. At CNS, this is accomplished by random patrols which are committed to and defined in the CNS Security Plan. Paragraph 10CFR73.55(c)(4) also requires that upon detection of penetration of the PA barrier, an adequate response be initiated. Adequate response is partially defined in paragraph 10CFR73.55(h)(4) which requires an assessment of and neutralization of any threat. At CNS the intrusion detection equipment is placed inside and parallel to the PA barrier as recommended by Regulatory Guide 5.44, Section C.1.a.(5). The fixed CCTV equipment is placed to view the entire zone and allow assessment, and is controlled to enhance the operator's ability to assess an alarm. By placing the perimeter systems (IDS and CCTV) interior to the PA barrier, the fixed CCTV equipment must be located interior to and away from the fence and biased towards the interior of the site to allow optimum intrusion assessment. This configuration does not allow the fixed CCTV equipment to fully view the exterior isolation zone due to a fence "shadowing" effect. The shadowing effect is due to the viewing angle which causes the fence to appear opaque.

The District believes the system upgrade, as proposed, is adequate and meets the requirement of 10CFR73.55. However, to resolve this issue, the District will modify the original CCTV upgrade by increasing the number of cameras by two (one PTZ and one fixed) and relocating one PTZ camera. Adequacy of the upgraded CCTV system will be verified during the post-maintenance testing phase following implementation.

Question 2:

NPPD needs to confirm that the outer isolation zone is being maintained in accordance with the approved Physical Security Plan.

Response:

NPPD is currently maintaining the outer isolation zone in accordance with the approved Safeguards Plan. Changes have recently been made in two areas of the zone to ensure continued compliance. An existing road, which passes through the outer isolation zone on the northwest corner, has been blocked and removed from daily use. Additionally, controls have been implemented in the isolation zone area adjacent to the main warehouse to control entries into the zone without prior notification.

Question 3:

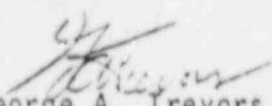
Region IV requests that you provide to us for information a description of the design change in the areas of the intrusion detection system and the CCTV system.

Response:

In response to this request, the District is providing a copy of the proposed Description section of the implementing Design Change, DC 87-050.

The District believes the answers provided are responsive to your needs. However, if further information or clarification is required, please contact me.

Sincerely,

  
George A. Trevors  
Division Manager of Nuclear Support

GAT/kcw:dh11/3(14)  
Enclosure

cc: W. L. Swantz

U.S. Nuclear Regulatory Commission  
Region Office, Region IV

NRC Resident Inspector  
Cooper Nuclear Station

bc: NRC Distribution