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Boelter Hall 2567
July 3, 1978

Mr. Edson G. Case, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Case: Docket: 50-142

Due to the sensitive nature of the contents of this letter, we request that this document be withheld from public disclosure pursuant to Section 2.790 of 10 CFR 20.

Page 2 of our proposed Amendment 3 to The Security Plan states that the reactor console is considered semi-essential equipment. The console is located in a controlled area (B level) during working hours and the area becomes an A level area, keyed but non-alarmed, during non-working hours. The intent of this measure is to limit access and traffic to the control room during non-working hours to A level NEL personnel only. This will be accomplished by an electric strike key control system which will become operational by September 1, 1978.

We do not believe that the reactor console is vital equipment in the sense that its loss or damage would pose a threat to the health and safety of the general public. Our belief stems from the following considerations:

1. There is essentially no decay heat due the low core power density and the limited hours of reactor operation. Hence, core cooling after shutdown is not necessary.
2. The safety checks in the preliminary start-up procedure are such that any damage or sabotage to the reactor console would not allow the reactor to either reach criticality or operate above 1 watt.

To alarm the control room, either with magnetic switches for the three doors or with area alarms would affect the laboratory and personnel in the following:

1. Financial: The cost for the installation of the magnetic switches on the doors would be approximately $1,500. while for the area alarms the cost would be approximately $2,000.
2. Alarms would require A level personnel to call the police department for entry through a common pathway to certain sections of the laboratory, including a restroom, offices, other work areas, etc.
3. Increase the probability of false alarms due to the addition of an add-on system to the reactor high bay alarm system.
4. Increase the risk of inadvertent intrusions by A level personnel causing a police response.

In summary, we would like Amandment #3 to be accepted as submitted. We are continuing to upgrade our security system without restricting operations; the latest additions being an electric strike key system to the control room, an alarmed panic exit device on the cargo door to the reactor high bay and the issuance of an A level key to the watch commander of the UCLAPD. However, we do believe that one more step on our part is in order. This would be to tie the control rod drive relays to the reactor high bay alarm system or to another switch inside the reactor high bay. Thus, unauthorized operation of the reactor would require entry into the high bay, actuation of the control rod magnetic power switch (to be alarmed), and accuating the dump valve switch (alarmed). This measure will be reflected in Amendment #4.

We hope that this discourse on the subject meets with your approval and that we may look forward to your favorable response.

Sincerely,

Neil C. Schroeder
for

Ivan Catton, Director
Nuclear Energy Laboratory

IC/li

cc: D. C. DiIanna