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D. Rosano

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Jan 5, 1998
E. S. Medling
Manager, Regulatory Projects

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Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Southern California Edison (Edison) Comments on Draft Regulatory Guide DG-5008, "Reporting of Safeguards Events," (63FR275 - January 5, 1998)

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US NRC

Gentlemen:

In the subject Federal Register Notice, NRC requested comments on Draft Regulatory Guide DG-5008, "Reporting of Safeguards Events." This letter provides Edison's comments on DG-5008.

Edison supports the NEI comments on the Draft Regulatory Guide. In addition, we would like to provide specific comments which are included in the enclosure.

Should you have any questions please contact me at 714-368-7492.

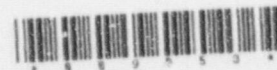
Sincerely,

E. S. Medling
E. S. Medling
Manager, Regulatory Projects

Enclosure

cc: E. W. Merschhoff, Regional Administrator, NRC Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
L. L. Wheeler, NRC Project Manager, San Onofre Unit 1
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
D. B. Spitzberg, Regional Project Inspector, San Onofre Unit 1
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
S. S. Bajwa, Section Chief, Decommissioning Section

San Onofre Nuclear Generating Station
P. O. Box 128
San Clemente, CA 92674-0128
714-368-7492
Fax 714-368-7575



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ENCLOSURE

Edison Comments on DG-5008

Section 2.1 - Safeguard Events to be Reported Within One Hour

We believe the reporting requirement for one-hour reports should only be for actual events, not for attempts or threats. Attempts and threats cannot reasonably be reported within one hour. Rather, we believe four hours would be preferable to allow for the adequate collection of information related to the attempt or threat.

Section 2.1.b

This section appears to indicate a significant change in the meaning of the words "unauthorized person." Please refer to the comments on Appendix A.

Section 2.1.d

The second sentence requires additional edification. This sentence uses the words "significant flaws." A corresponding qualifier similar to "significant" is needed preceding "reduction in overall protection." This will provide necessary clarification as to what should or should not be reported in one hour. As presently written, any reduction in protection would have to be reported within one hour.

Section 2.2 - Example 2

The word "credible" should be inserted at the beginning of the sentence as is currently the case in Revision 1 of the Regulatory Guide. Reporting all threats without assessing credibility creates an opportunity for generating publicity based on non-credible events. We believe the reporting system should not encourage this type of situation. In addition, Appendix G of 10CFR73.71 addresses only credible threats.

Section 2.2 - Example 4

Clarification of what is meant by "classified documents" versus "significant unclassified safeguards information" is needed.

Section 2.2 - Example 9

10CFR73 Appendix G requires that tampering be reported only when it results in the "interruption of normal operation of a licensed nuclear power reactor." Example 9 should either be withdrawn or modified to more clearly state that

the one-hour clock starts when tampering has been confirmed to be of malevolent intent. In addition, reference to "suspicious origin" is too broad a term and should be deleted.

Section 2 - Example 12

Appendix C does not provide recommended compensatory measures for this example.

Section 2 - Example 21

Examples 12, 16, and 21 should be consolidated for clarity.

Section 2.3.2

This statement is too broad and open to too much interpretation. Some reportability threshold for "reduction in effectiveness" needs to be established.

Section 2.4 - Example 1

This example needs to be clarified to address complete (primary and secondary) or partial security computer failures. If logging only pertains to partial computer failures, then a corresponding example should be added to Section 2.2.

Section 2.4 - Example 3

This example would make multiple, compensated IDS zone failures a one-hour report. Clarification of this point is needed. In addition, "a short period of time" is not defined.

Section 2.4 - Example 5

This example would make multiple, compensated failures of perimeter lighting zones a one-hour report. Clarification of this point is needed.

Section 2.4 - Example 9

Examples 8 and 9 should be merged into Example 1.

Section 2.4 - Footnote 2

This position should be revised to be consistent with Enclosure 1 of Generic Letter 91-03.

Section 2.4 - Example 14

This example would make multiple, compensated CCTV failures a one-hour report. Clarification of this point is needed.

Section 2.4 - Example 16

The words "significant threat" are not defined.

Section 2.4 - Example 17

Example 17 should be merged with Example 12.

Section 2.4 - Example 18.2

The words "short period" are not defined.

Section 2.4 - Example 18.3

The words "several minutes" are not defined.

Section 2.4 - Example 18.6

The word "promptly" should be placed before the word "corrected."

Section 2.5 - Example 6

Tampering should only be reported or logged when it has been confirmed to be malevolent. Such a determination generally cannot be made within one hour.

Appendix A - Glossary

The contraband threshold (e.g., a few bullets) of Generic Letter 91-03 should be added to the contraband definition.

Appendix A - Glossary - Unauthorized Person

The definition of "unauthorized person" should be clarified so as not to be applicable to situations such as those described in Section 2.4, Example 18.1 of Events to be Logged.

Appendix C - Vital Area Card Readers

The words "through which access is permitted" should be added to the last sentence.