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In Reply Refer To:
Docket: 50-458

Gulf States Utilities
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Gentlemen:

This refers to a meeting of Region IV licensee security managers at Arlington, Texas, on October 28, 1986. Region IV physical security inspectors met with the licensee security management to discuss the recently published Miscellaneous Amendments to 10 CFR 73.55.

The licensee security managers asked several questions of the Region IV staff that were the basis of a Region IV Memorandum to NRC Headquarters in order to resolve the issues raised by the licensee staff members. The questions and the NRC Headquarters guidance are in Enclosure 1.

If you have any questions, please contact Mr. Bruce Earnest at (817) 860-8146.

Sincerely,

"Original Signed by:

R. E. Hall" *for*

J. E. Gagliardo, Chief
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Enclosure:
Miscellaneous Amendments Generic Issues

cc w/enclosure:
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bcc: (see next page)

RIV:EP&SPS *WJ*
ABEarnest/cg
4/2/87

C:EP&SPS *WJ*
LAYandell
4/2/87

C:R&SPB *WJ*
WLFisher
4/2/87

C:RPB/A *WJ*
JPJaudon
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C:RPB *WJ*
JEGagliardo *4/3/87*
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RPB

DRSP

Resident Inspector

R. D. Martin, RA

Section Chief (RPB/A)

D. Weiss, RM/ALF

MIS System

RSB

RSTS Operator

R&SPB

RIV File

Inspector

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W. L. Fisher

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Project Inspector, RPB

G. M. McCorkle, NMSS

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ENCLOSURE 1

Miscellaneous Amendments Generic Issues

1. 10 CFR 73.55(e)(1)

- a. Some licensees' nonportable radio equipment is not located in vital areas. Is there a need to provide vital area (VA) protection for the power supply when the nonportable radio equipment itself is not in a vital area? Is it an NRC requirement that all nonportable radio equipment be in a VA, including antennas, repeater sites, and microwave equipment?

Answer: Antennas, repeater sites and associated microwave equipment which support the function of offsite communications are not required to be located within vital areas. 10 CFR 73.55(e)(3) requires that radio or microwave transmitted two-way voice communications between the local law enforcement authority and the licensee terminate in each continuously manned alarm station. Hence, nonportable communications equipment (i.e., the base station) is typically located within the central alarm station which is normally located in a vital area.

- b. Is support equipment for the backup power supply, such as interconnecting wiring, junction boxes, and diesel fuel oil tanks and lines, also required to be protected in VAs?
- c. How long must the backup power supply be able to function before restoration of primary power? Does backup power supply mean batteries and diesel generators?

Answer: b. and c. The objective of secondary power supply systems (SPSS) is to provide auxiliary power during power interruptions or outages for periods of up to 8 hours in duration. In view of this objective, it is necessary to protect all components of a SPSS needed to provide this period of standby power. Such components may include, but are not necessarily limited to, the following:

- (1) Batteries
- (2) Battery chargers
- (3) Inverters
- (4) AC alternators
- (5) DC generators
- (6) Emergency buses
- (7) Control panels
- (8) Switch gear
- (9) Identifiable cabling
- (10) Main fuel tanks or day tanks and associated plumbing/piping

2. 10 CFR 73.55(d)(1)

If two cleared personnel (one security and one nonsecurity) leave the protected area (PA), are both required to be searched upon re-entry to the PA?

Answer: Because employee screening programs are inconsistently applied throughout the nuclear industry, if two "cleared" individuals (one security and one nonsecurity) leave the protected area, both should be searched upon re-entry to the PA. Because NRC has screening requirements for members of the security force under Appendix B to Part 73, if a member of the security force leaves the PA, the individual need not be researched prior to PA entry if the individual has been under the direct observation or accompaniment of another member of the security force.

3. 10 CFR 73.55(d)(7)(ii)(B)

Will one document attesting to the review of plans and procedures, in order to ensure there is no adverse effect on safety in the plant, be sufficient or is the licensee required to provide a document for each plan or procedure?

Answer: It is contemplated that one document attesting to the review of plans and procedures is sufficient in order to assure that safeguards do not negatively impact safety at the plant.

4. 10 CFR 73.55(d)(9)

The above paragraph requires locks, keys, combinations, and related access control devices be changed or rotated every 12 months. What is the definition of related access control devices and does this include card readers and cards?

Answer: "Related access control devices" do not include card readers and cards. However, whenever there is evidence or suspicion of compromise or whenever an individual is terminated for cause, the individual's access authorization should be immediately removed from the key card system.

5. 10 CFR 73.55(d)(7)

Several Region IV licensees are experiencing confusion in reference to VA access authorizations for licensee personnel. The licensees award access based on job description rather than frequency of access need. If an employee is occasionally required to enter a VA to work (e.g., five or six times a year), is this occasional need sufficient to grant access on a constant basis? If this is not the case, and day-to-day access or escort is used instead, what is occasional need and what is constant need (once a week, monthly, annually)?

Answer: If an individual requires unescorted vital area access to perform job duties, the individual should be screened in accordance with licensee procedures and processed accordingly. Under the Miscellaneous Amendments, a new provision (73.55(d)(7)(i)(A) requires licensees to establish current authorization access lists for each vital area. The access lists must be updated and reapproved by the cognizant licensee management or supervision at least once every 31 days. Typically, an

individual granted an unescorted facility access which is not exercised at least once per month should not be included on authorization access lists for those months when access is not required.