

SEP 09 1987

Docket No. 50-298

Mr. George A. Trevors, Division
Manager - Nuclear Support
Nebraska Public Power District
P. O. Box 499
Columbus, Nebraska 68601

Dear Mr. Trevors:

SUBJECT: MISCELLANEOUS AMENDMENTS/SEARCH REQUIREMENTS
COOPER NUCLEAR STATION (TAC NO. 65213)

This is to acknowledge receipt of the Nebraska Public Power District letter, dated April 16, 1987, which transmitted a proposed amendment to the Cooper Nuclear Station Physical Security Plan, in response to the Miscellaneous Amendments and Search Requirements.

The submitted document has been reviewed and we have comments for your consideration prior to our approval. The enclosed comments are based upon pertinent NRC regulations and published guidance describing methods, acceptable to the NRC staff, for implementing specific parts of those regulations.

It is requested that you provide your response to these with 45 days from receipt of this letter.

The reporting and/or record keeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Should you have any questions concerning the enclosed comments, please contact the reviewer, Barry Manili, at (301) 492-7077.

Sincerely,

William O. Long, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
Physical Security Plan Comments

cc w/enclosure:
See next page

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8/25/87	8/25/87	8/25/87	8/25/87	8/26/87	9/9/87	9/9/87

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PDR ADOCK 05000298
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Mr. George A. Trevors
Nebraska Public Power District

Cooper Nuclear Station

cc:

Mr. G. D. Watson, General Counsel
Nebraska Public Power District
P. O. Box 499
Columbus, Nebraska 68601

Cooper Nuclear Station
ATTN: Mr. Guy R. Horn, Division
Manager of Nuclear Operations
P. O. Box 98
Brownville, Nebraska 68321

Director
Nebraska Department of Environmental
Control
P. O. Box 94877
State House Station
Lincoln, Nebraska 68509-4877

Mr. William Siebert, Commissioner
Nemaha County Board of Commissioners
Nemaha County Courthouse
Auburn, Nebraska 68305

Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 218
Brownville, Nebraska 68321

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Mr. Harold Borchart, Director
Division of Radiological Health
Department of Health
301 Centennial Mall, South
P. O. Box 95007
Lincoln, Nebraska 68509

ENCLOSURE
COMMENTS ON PHYSICAL SECURITY PLAN CHANGES
(MISCELLANEOUS AMENDMENTS AND SEARCH REQUIREMENTS)
COOPER NUCLEAR STATION

1. The commitment on page 1 should be revised to indicate that vital area access controls will not be dropped for life threatening situations not involving public health and safety by deleting the word "medical" from the first paragraph. Reference 10 CFR 50.54 (x) and (y) and Generic Letter 87-08 (Q&A #3).
2. You should include a commitment that if the firearms and explosives portal detection equipment fails to operate satisfactorily and handheld equipment with similar capability is unavailable, a physical pat-down search of all persons entering the protected area will be conducted. Reference 10 CFR 73.55(d)(1).
3. You should include a commitment that if security force members leave the protected area to perform official duties subsequent to their initial entry and search, they will be searched prior to re-entry into the protected area if they have not been under direct observation or accompanied by another member of the security force. Reference 10 CFR 73.55(d)(1) and Generic Letter 87-08 (Q&A #11).
4. You should include a statement that only bona fide Federal, State, and local law enforcement personnel on official duty are exempt from the required equipment searches upon entry to the protected area. Reference 10 CFR 73.55 (d)(1).
5. The commitment on page 34 should be revised to ensure prompt access to vital equipment to accommodate the potential need for rapid ingress or egress of individuals to address emergency conditions or situations. Indicate how this prompt access will be ensured (e.g., by issuing override keys to appropriate operators and security force members at the start of each shift, or by other acceptable means). Reference 10 CFR 73.55(d)(7)(ii) and Generic Letter 87-08 (Q&A #6).
6. The commitment on page 1 should be revised to periodically (annually) review physical security and contingency plans and procedures to evaluate their potential impact on plant and personnel safety. Reference 10 CFR 73.55 (d)(7)(ii)(B) and Regulatory Guide 5.65.
7. The commitment on page 20, that all keys, locks, combinations, and related access control devices used to control access to protected and vital areas shall be changed or rotated from "annually," should be changed to "at least every 12 months". Reference 10 CFR 73.55(d)(9).
8. You should include a specific commitment that the secondary power supply systems for both the alarm annunciator equipment and non-portable communications equipment shall be located within a vital area. Reference 10 CFR 73.55(e)(1) and Generic Letter 87-08 (Q&A #16).

9. You should indicate what additional components of the secondary power supply system will be protected as vital. Reference 10 CFR 73.55(e)(1) and Generic Letter 87-08 (Q&A #18).
10. You should include a commitment to maintain a log indicating name, badge number, time of entry, and time of exit of all individuals granted access to all vital areas except those individuals entering or exiting the reactor control room. Reference 10 CFR 73.70(d).

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COOPER NUCLEAR STATION (TAC # 65213)

This is to acknowledge receipt of the Nebraska Public Power District letter, dated April 16, 1987, which transmitted a proposed amendment to the Cooper Nuclear Station Physical Security Plan, in response to the Miscellaneous Amendments and Search Requirements.

The submitted document has been reviewed and we have determined that additional information and revisions to the plan are required prior to our approval. The enclosed comments are based upon pertinent NRC regulations and published guidance describing methods, acceptable to the NRC staff, for implementing specific parts of those regulations.

It is requested that you provide your response to these comments within 30 days from receipt of this letter.

The reporting and/or record keeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Should you have any questions concerning the enclosed comments, please contact the reviewer, Barry Manili, at (301) 492-7077.

Sincerely,

William Long, Project Manager
Project Directorate IV
Division of Reactor Projects III, IV, V
and Special Projects
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OFC	: RSGB	: RSGB	: RSGB	: RSGB	: PDIV	: PDIV	: PDIV
NAME	: BManilli	: CBuracker	: LBush	: RErickson	: PNoonan	: WLong	: JCalvo
DATE	: 8/25/87	: 8/25/87	: 8/25/87	: 8/25/87	: 8/26/87	: 8/ /87	: 8/ /87

COMMENTS ON PHYSICAL SECURITY PLAN CHANGES
(MISCELLANEOUS AMENDMENTS AND SEARCH REQUIREMENTS)
COOPER NUCLEAR STATION

Revise the commitment on page 1 to indicate that vital area access controls will not be dropped for life threatening situations not involving public health and safety by deleting the word "medical" from the first paragraph. Reference 10 CFR 50.54(x) and (y) and Generic Letter 87-08 (Q&A #3).

Provide a commitment that if the firearms and explosives portal detection equipment fails to operate satisfactorily and handheld equipment with similar capability is unavailable, a physical pat-down search of all persons entering the the protected area will be conducted. Reference 10 CFR 73.55(d)(1).

Provide a commitment that if security force members leave the protected area to perform official duties subsequent to their initial entry and search, they will be searched prior to re-entry into the protected area if they have not been under direct observation or accompanied by another member of the security force. Reference 10 CFR 73.55(d)(1) and Generic Letter 87-08 (Q&A #11).

Provide a statement that only bona fide Federal, State, and local law enforcement personnel on official duty are exempt from the required equipment searches upon entry to the protected area. Reference 10 CFR 73.55(d)(1).

Revise the commitment on page 34 to ensure prompt access to vital equipment to accommodate the potential need for rapid ingress or egress of individuals to address emergency conditions or situations. Indicate how this prompt access will be ensured (e.g., by issuing override keys to appropriate operators and security force members at the start of each shift, or by other acceptable means). Reference 10 CFR 73.55(d)(7)(ii) and Generic Letter 87-08 (Q&A #6).

Revise the commitment on page 1 to periodically (annually) review physical security and contingency plans and procedures to evaluate their potential impact on plant and personnel safety. Reference 10 CFR 73.55(d)(7)(ii)(B) and Regulatory Guide 5.65.

Revise the commitment on page 20 that all keys, locks, combinations, and related access control devices used to control access to protected and vital areas shall be changed or rotated from "annually" to at least every 12 months Reference 10 CFR 73.55(d)(9).

Provide a specific commitment that the secondary power supply systems for both the alarm annunciator equipment and non-portable communications equipment shall be located within a vital area. Reference 10 CFR 73.55(e)(1) and Generic Letter 87-08 (Q&A #16).

Indicate what additional components of the secondary power supply system will be protected as vital. Reference 10 CFR 73.55(e)(1) and Generic Letter 87-08 (Q&A #18).

Provide a commitment to maintain a log indicating name, badge number, time of entry, and time of exit of all individuals granted access to all vital areas except those individuals entering or exiting the reactor control room. Reference 10 CFR 73.70(d).