Docket No. 50-245/336/423

Mr. Edward J. Mroczka Senior Vice President Nuclear Engineering & Operations P.O. Box 270 Hartford, Connecticut 06141-0270

Dear Mr. Mroczka:

SUBJECT: MISCELLANEOUS AMENDMENTS/SEARCH REQUIREMENTS

MILLSTONE NUCLEAR POWER STATION (TAC #65187/65340/65320)

This is to acknowledge receipt of the Northeast Nuclear Energy Company letter, dated December 2, 1986, which transmitted a proposed amendment to the Millstone Nuclear Power 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. 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, Gene McPeek, at (301) 492-4968.

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Michael Boyle, Project Manager Intergrated Safety Assessment Project Directorate Project Directorate I-4 Division of Reactor Projects III, IV, V and Special Projects

Sincerely, 151

David H. Jaffe, Project Manager Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Physical Security Plan Comments

Office of Nuclear Reactor Regulation

cc w/enclosure: See next page

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RFerguson NRC PDR Case File Local PDR RErickson wo/encl PStarcher

LBush wo/encl

: RSGB : RSGB-: RSGB : PD/ISAP : CBuracker NAME GMcPeek : LBush : MBoyle :9/20/87 :9/25/87 DATE : 9/15/87 10/ / /87 Mr. Edward J. Mroczka Northeast Auclear Energy Company

cc: Gerald Garfield, Esquire Day, Berry & Howard Counselors at Law City Place Hartford, Connecticut 06103-3499

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Mr. Kevin McCarthy, Director Radiation Control Unit Department of Environmental Protection State Office Building Hartford, Connecticut 06115

Burlington Electric Department c/o Robert E. Fletcher, Esq. 271 South Union Street Burlington, Vermont 05402

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

Provide a schedule for implementing the amended safeguards requirements within 180 days after Commission approval of the proposed security plan. Reference 10 CFR 73.55.

State that vital area access controls will not be dropped for life threatening situations not involving public health and safety. Reference 10 CFR 50.54(x) and (y) and Generic Letter 87-08 (Q&A #3).

Provide a commitment that the search requirements will be implemented within 60 days after Commission approval of the proposed revisions. 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).

Revise the statement on page 6-8 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 to positively control, in accordance with the current approved access lists, all points of vehicle access to vital areas. Reference 10 CFR 73.55(d)(7)(i)(B).

Provide a commitment to ensure prompt access to vital equipment to accommodate the potential need for rapid ingress or egress of individuals during 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 15-1 from biannual 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 6-17 that all keys, locks, combinations, and related access control devices used to control access to protected and vital areas shall be changed or rotated at least every 12 months by deleting the reference to ± 3 months from the plan. 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 specific 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 a vital area except those individuals entering or exiting the reactor control room. Reference 10 CFR 73.70(d).