

Mr. Kenneth W. Berry, Director  
Nuclear Licensing  
Consumers Power Company  
1945 West Parnall Road  
Jackson, Michigan 49201

NOV 5 1987

Dear Mr. Berry:

SUBJECT: MISCELLANEOUS AMENDMENTS/SEARCH REQUIREMENTS  
BIG ROCK POINT PLANT (TAC #65250)

This is to acknowledge receipt of the Consumers Power Company letter, dated December 2, 1986, which transmitted a proposed amendment to the Big Rock Point Plant 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, Robert Skelton, at (301) 492-4533.

Sincerely,

*James R. Hall*

James R. Hall, Project Manager  
Project Directorate III-1  
Division of Reactor Projects III, IV, V  
and Special Projects  
Office of Nuclear Reactor Regulation

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Enclosure:  
Physical Security Plan Comments

cc w/enclosure:  
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Docket No. 50-155

Mr. Kenneth W. Berry, Director  
Nuclear Licensing  
Consumers Power Company  
1945 West Parnall Road  
Jackson, Michigan 49201

Dear Mr. Berry:

SUBJECT: MISCELLANEOUS AMENDMENTS/SEARCH REQUIREMENTS  
BIG ROCK POINT PLANT (TAC #65250)

This is to acknowledge receipt of the Consumers Power Company letter, dated October 2, 1986, which transmitted a proposed amendment to the Big Rock Point Plant 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.

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James R. Hall, Project Manager  
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Enclosure:  
Physical Security Plan Comments

cc w/enclosure:  
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| NAME | : Rskelton:mg | : CBuracker | : LBush | : RErickson | : RIngram  | : JHall    |
| DATE | : / /87       | : 10/ 6/87  | : / /87 | : / /87     | : / /87    | : / /87    |



COMMENTS ON PHYSICAL SECURITY PLAN CHANGES  
(MISCELLANEOUS AMENDMENTS AND SEARCH REQUIREMENTS)  
BIG ROCK POINT NUCLEAR PLANT

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).

Revise the commitment in Section 3.2.1.5.6 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 in Section 5.2.1.4 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). Delete the reference to procedures and place the necessary information in the security plan. Reference 10 CFR 73.55(d)(7)(ii) and Generic Letter 87-08 (Q&A #6).

Revise the commitment in Section 14.1.1 to periodically (annually) review physical security and contingency plans and procedures to indicate potential impact on plant and personnel safety. Delete the reference to ( $\pm 10\%$ ) from the commitment. Reference 10 CFR 73.55 (d)(7)(ii)(B) and Regulatory Guide 5.65.

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).

Mr. Kenneth W. Berry  
Consumers Power Company

Big Rock Point Plant

cc: Mr. Thomas A. McNish, Secretary  
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Jackson, Michigan 49201

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Big Rock Point Plant  
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