

December 17, 2002

Mr. Rod Krich  
Exelon Generation Company  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: COMMENTS ON LOUISIANA ENERGY SERVICES REQUEST FOR  
FACILITY CLEARANCE

Dear Mr. Krich:

On October 31, 2002, you submitted a request for a U.S. Nuclear Regulatory Commission clearance for a classified information storage facility in Spartanburg, South Carolina. We reviewed your application and are providing comments in the Enclosure. We would appreciate receiving your responses to our comments by January 17, 2003.

If you have any questions, please contact me at 301-415-7299.

Sincerely,

**/RA/**

Timothy C. Johnson  
Special Projects Section  
Special Projects and Inspection Branch  
Division of Fuel Cycle Safety  
and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

Docket: 70-3103

Enclosure: Comments on "Standard Practice Procedures Plan  
For Lockwood Greene Spartanburg Facility"

cc: William Szymanski/DOE  
George Dials/LES  
James Curtiss/W&S  
Jerry Clift/Trousdale  
Mario Robles/USEC  
E. Nanney/State of Tennessee  
Michael Marriotte/NIRS

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COMMENTS ON "STANDARD PRACTICE PROCEDURES PLAN  
FOR LOCKWOOD GREENE SPARTANBURG FACILITY"

1. Section 2.0, 3<sup>rd</sup> paragraph, 2<sup>nd</sup> line, p. 2

The word "Sensitive" should be replaced with the word "Security."

2. Section 3.2, p. 2

What is the nature of the U.S. Nuclear Regulatory Commission (NRC)/Louisiana Energy Services (LES) activity at the Spartanburg site? Please address in this section.

3. Section 3.4, p. 5

A separate classified mailing address for the "outer envelope" needs to be reflected in this section.

4. Section 3.5, p. 5

A separate Foreign Ownership, Control, and Influence (FOCI) package needs to be submitted for the Lockwood Greene facility before a facility clearance can be granted. This requirement should be reflected in this section.

5. Section 8.1.6, p. 13

"Line Security" is applicable and should be addressed in this section. An alarm should be activated whenever its lines are tampered with.

6. Section 8.1.7, p. 13

What does the term "tamper protection" mean? Please elaborate.

7. Section 8.1.8, p. 14

What is the capacity in hours of the emergency power system? More information is needed here.

8. Section 8.6, p. 16

Will end -of- the day security checks be performed for the classified repository in the classified workroom as required? This commitment needs to be addressed in this section.

9. Section 8.8, p. 17

The word "security" should be replaced with the word "secured."

10. Section 13, paragraph b.1.ii., p. 21

The current Executive Order 12958, "Classified National Security Information," no longer allows "OADR" to be used for declassification instructions on marking stamps for new documents. The correct marking stamp for National Security Information is as follows:

Derived From \_\_\_\_\_  
(Source/Date)  
Reason \_\_\_\_\_  
Declassify On: \_\_\_\_\_  
(Date/Event/Exemption)  
Classifier: \_\_\_\_\_  
(Name/Title/Number)

The correct marking stamp for RD is as follows, and should also be reflected in this section:

Classified By: \_\_\_\_\_  
Classifier: \_\_\_\_\_  
Title: \_\_\_\_\_

11. Section 13, paragraph j., pp. 23-24

Requests for downgrading or declassifying of Restricted Data are now to be forwarded to the NRC Division of Nuclear Security for coordination with the Department of Energy. This change is a result of the formulation of NRC's Office of Nuclear Security and Incident Response.

12. Section 19.2, p. 27

The anticipated August 8, 2002, start date for classified ADP activities is inaccurate given the fact that Lockwood Greene has not yet been approved to process/handle classified information.

13. Section 19.3, pp. 27-28

The word "protected" should be replaced with the word "protection."

14. Section 19, p. 27

What is the nomenclature of all the equipment which comprises the classified work station stand-alone computer? What is the manufacturer's name and model number of

each piece of equipment? This section needs to be completed per the standard practice procedures plan guidance provided.

15. Section 19.6.1, p. 28

Will the in-house technical staff possess the appropriate level of security clearance to accomplish computer system repairs? Please clarify. If more work is needed than in-house staff can provide, how will classified system repairs be accomplished?

16. Section 19.8, p. 29

What happens if the removable hard drives fail? How will destruction of failed hard drives be accomplished?

17. Section 19.11.2, p. 30

It appears that this section has not been addressed. The information submitted only states the requirement listed in the standard practice procedures plan guidance that was provided to the license applicant.

18. Section 19.11.3,

See Comment 16.

19. Section 19.12.1, p. 30

The description of the Secure Storage Facility/Automatic Data Processing (ADP) Facility does not comport with the floor plan of the classified work area shown on page 4 of the plan. According to the floor plan, there appear to be hallways surrounding three sides of the facility, not two. Please clarify.

20. Section 19.12.11, p. 31

What is the manufacturer's name and model number of the equipment to be used for classified matter destruction? Does the equipment meet the National Security Agency's requirements for destruction of classified material?