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2005 DEC -1 AM 11: 21

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10/05/05
70FR 58490

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E-RIDS = ADM-03

SESP Review Complete

United States Nuclear Regulatory Commission

Template = ADM-013

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December 1, 2005

Nuclear Regulatory Commission Draft Regulatory Guide DG-8028
"Control Of Access to High and Very High Radiation Areas in Nuclear Power Plants"

Comments by American Electric Power, Cook Nuclear Plant

Comment #1 Section 1.5 "Physical Controls"

This section does not provide enough detail to allow consistent interpretation by the various stakeholders who evaluate nuclear plant high radiation area access control programs. Examples of questions/concerns previously offered by evaluators include:

1. If a person can reach their arm into a Locked High Radiation Area (LHRA) does that constitute an entry?
   - Is there a maximum dimension for a gap at the perimeter of a barrier or within the barrier itself for a LHRA?

2. The example for unauthorized personnel access *"an individual who incorrectly assumes, for whatever reason, that he or she is authorized to enter the area, would be unlikely to disregard and/or circumvent the barrier"* is also relatively vague.

   - If a person can deliberately circumvent a two meter barrier by climbing on system cable trays, piping or conduit supports, does that qualify as *"unlikely to disregard and/or circumvent the barrier"?*
     Some evaluators have implied that a LHRA barrier must be impenetrable, such that a deliberate attempt to circumvent the barrier is impossible.

Comment #2 Section 4.2 "Spent Fuel Pools, Reactor Vessels, and Refueling Cavities"

The Reg. Guide specifies these pool areas do not have to be controlled as high or very high radiation areas solely because of the materials in them, provided that the following criteria are fulfilled:

4) Diving operations are not being conducted in the pool, has been added as one of the criteria listed. This would seem to imply that once a diver enters the water, that pool area should now be controlled as a Very High Radiation Area.

- These pools by design do not lend themselves well to locking as a means for VHRA access control, as required by section 3. Are the alternative methods for access control listed in section 2.4 intended to be employed during diving operations in a given pool?

- If diving in a refueling cavity when there is no nuclear fuel present, are VHRA controls still required ?

The way this guidance is written leaves its implementation subject to interpretation. A VHRA access violation based on an evaluator interpretation that is different than that perceived by the site would be a significant event.

Thank You,

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