

VIRGINIA ELECTRIC AND POWER COMPANY  
RICHMOND, VIRGINIA 23261

W. L. STEWART  
VICE PRESIDENT  
NUCLEAR OPERATIONS

January 3, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
Attn: Mr. Robert A. Clark, Chief  
Operating Reactors Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No. 724  
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Docket Nos. 50-280  
50-281  
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License Nos. DPR-32  
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NPF-4  
NPF-7

Gentlemen:

We have reviewed your letter concerning our September 17, 1982 submittal for changes to our Surry and North Anna Security Training and Qualification Plans.

The enclosure to this letter contains our responses to your comments and is intended to provide all the necessary additional information in order for you to complete your review.

Should you require any additional information, please contact this office.

Very truly yours,

  
W. L. Stewart

cc: Mr. James P. O'Reilly  
Regional Administrator  
Region II

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#### NRC COMMENT

<u>Page</u>	<u>Section</u>	<u>Comment</u>
1-1	1.1	Confirm that members of the security forces shall have no felony convictions involving the use of weapons.

#### RESPONSE

The intent of the change in Section 1.1.2, in no way decreases it's effect. To state "no individual may have a felony or misdemeanor conviction that reflects on the individual's reliability" does definitely include the use of a weapon in the act of a felony.

#### NRC COMMENT

<u>Page</u>	<u>Section</u>	<u>Comment</u>
2-71	Task 42	Explain the use of security portable radios versus the dedicated intercom by individuals in the defensive positions.

#### RESPONSE

The dedicated intercom in each defensive position allows contact with each DP with all conversation heard in each one at the same time to include the CAS and SAS. Normal routine communications can be conducted at these locations without tie up of the radio net. With the capability of using the public address system in connection with the intercom, the individual in the DP can communicate with anyone entering his/her sector of responsibility.

When the portable radio is used all members of the security force become aware of the communications at the same time. When the individual in the DP uses the portable radio he/she is able to communicate the present condition to all members immediately and make known when conditions change. This is especially beneficial during a contingency situation.

The security intercom allows routine communications to those directly involved in the DP, CAS, and SAS without radio net tie up while the portable radio allows communications to all members when and if needed.

#### NRC COMMENT

<u>Page</u>	<u>Section</u>	<u>Comment</u>
2-72	Task 43	Explain the difference between "response" team leader and "field" team leader.

#### RESPONSE

The "response" team leader is the Security Shift Supervisor acting as the director of the Armed Response Force. He is normally located in the SAS at time of direction.

The "field" team leader is the Security Assistant Shift Supervisor acting on the direction of the Security Shift Supervisor. He would normally be in the field with the Armed Response Force keeping the director (Shift Supervisor) advised of all conditions and/or condition changes.

#### NRC COMMENT

<u>Page</u>	<u>Section</u>	<u>Comment</u>
2-73	Task 44	Provide a justification for deleting "hand and arm signals".

#### RESPONSE

It has been our experience in conducting training to members of the security organization that during a contingency threat event, "hand and arm signals" are not practical. The areas where contingency threats are the greatest, if the threat was in fact effected, do not allow sufficient room to observe these signals and would place the armed responder in great danger of exposure to the adversary. These conditions are not like military movements where direction and observation can be controlled by one leader. The armed responder is trained to react to special duties required of a threat contingency and uses the portable radio to maintain communications. Contingency drills have shown the bad results of trying to use "hand and arm signals" in a confined area of equipment and with a limited number of personnel.