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UNITED STATES  
NUCLEAR REGULATORY COMMISSION



In the Matter of

UNITED STATES DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION

TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor  
Plant)

Docket No. 50-537

APPLICANTS' RESPONSE TO INTERVENORS',  
NATURAL RESOURCES DEFENSE COUNCIL, INC.,  
AND SIERRA CLUB REQUEST TO PRODUCE  
(SEVENTEENTH SET OF  
INTERROGATORIES) TO THE APPLICANTS

Pursuant to 10 C.F.R. § 2.740b., the United States Department of Energy and Project Management Corporation, acting for themselves and on behalf of the Tennessee Valley Authority (the Applicants), hereby respond to Intervenor's, Natural Resources Defense Council, Inc., and the Sierra Club, Seventeenth Set of Interrogatories and Request to Produce to the Applicants, dated March 26, 1982.<sup>\*/</sup>

<sup>\*/</sup> The Applicants' April 2, 1982 Motion for a Protective Order objected to and sought relief from Interrogatories 2-18 and the associated document requests. The Board's April 6, 1982 ruling during the prehearing meeting of counsel granted Applicants' Motion as to interrogatories 2-18 and the accompanying document requests. Applicants' response to interrogatories 1 and 19 was timely filed on April 9, 1976. Applicants'

Continued

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REQUEST:

1. Which of the following new technologies, techniques or safeguards systems, referred to in DOE, Draft Environmental Impact Statement (Supplement to ERDA-1535, December 1975) Liquid Metal Fast Breeder Reactor Program (December 1981), are planned to be utilized at the CRBR plant and supporting fuel cycle facilities:

- (a) Electronic (fiberoptic and/or acoustically read) seals;
- (b) Microwave, ultrasonic and/or buried cable motion detectors;
- (c) Computerized alarm display systems;
- (d) Continuous surveillance (video -- closed circuit television) cameras;
- (e) Automated computerized measurement systems;
- (f) Multiple integrated laser engagement systems;
- (g) DYMAC and RETIMAC systems;
- (h) Burnup calculations and isotopic correlation techniques;
- (i) Non-destructive analysis (NDA techniques)?

With respect to each such technology, technique, or safeguards system, identify and produce any and all documents in the possession of the Applicants which describe their deployment and operation and/or provide an assessment of the effectiveness thereof.

RESPONSE:

The applicants do not plan to use (a) electronic seals or isotopic correlation techniques (h). Burnup

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response to the document request accompanying Interrogatory 1 was due on or before April 30, 1982.

calculations (h) will be performed at CRBRP, but no information is available as to operation or assessment of effectiveness.

Applicants have no information, beyond that cited in the April 9, 1982 Answer to Interrogatory No. 1, Set 17, as to deployment, operation or assessment of effectiveness of the multiple integrated laser engagement system (f).

The following documents provide some additional information beyond that cited in the April 9, 1982 Answer to Interrogatory No. 1, Set 17, regarding the assumed deployment and operation of an automated, computerized measurement system (e), or DYMAC/RETIMAC (g) at the SAF fuel fabrication line being installed in the FMEF building.

Fazzari, F. M., et al., Safeguards Instrumentation for the Secure Automated Fabrication (SAF) of Breeder Fuel. HEDL/FA-2551, presented at Inst. Chem. Eng. meeting in Florida, Feb. 1982.

R. L. Carlson, Safeguarding On-line Accountability Data, HEDL/SA-2070, Jour. INMM, IX, Proc. Issue, 666-672, 1980.

R. L. Carlson, Description of Computer Functions in the Rescoped FMEF, HEDL/TC-1542, 1979.

In addition to the references given in the April 9, 1982 Answer to Interrogatory No. 1, Set 17, the following references on operations and effectiveness of NDA

instrumentation (i), which probably will be used in connection with the fabrication of CRBR fuel, in addition to the at-line or on-line instrumentation are:

Boria, P., Rod Scanner Assay of FFTF Fuel, HEDL/TME 77-29, 1977.

Coris, T. et al., Safeguards Nondestructive Assay Program Plans, HEDL/TC-2010, 1980.

Reilly, T.D., et al., Measurement Reliability for Nuclear Material Assay, Los Alamos Nat. Lab., LA-6574, 1977.

Regarding computerized alarm display systems (c), Applicants have no direct information on operation or performance. The article, Barnes, L. D., Access Control System Operation, Jour. INMM, X, Proceedings issue, 232, 1981 is known to Applicants.

Regarding items (b) (c) and (d), the following documents contain the information available to the Applicants regarding the deployment and anticipated operation of the intrusion detectors, computerized alarm display systems, and CCTV surveillance equipment which will be used in the near future at the fuel fabrication facilities in the 300 and 400 areas at Hanford:

1. Raymond, F., FMEF Security System Design Basis and Description, Sandia National Laboratory SAND 80-1506, Nov. 1980.

2. Operating and Maintenance Manual for Project V-711 Security System, HEDL/CSE 711-2, Rev. 0, 2/8/82.

3. Software Functional Requirements for Project V-711 Security System, HEDL/CSE 711-1, 1/5/81.

4. Software Detailed Design, etc., HEDL/CSE 711-2, 3/24/81.

5. Acceptance Test Plan for Security System V-711, HEDL/ATP-V-711, 2/6/82.

In regard to the CRBRP itself, the set of documents which includes information relating to (b), (c), and (d)<sup>\*/</sup> ((a); (e)-(i) do not apply to CRBRP) are identified on Attachment A hereto.

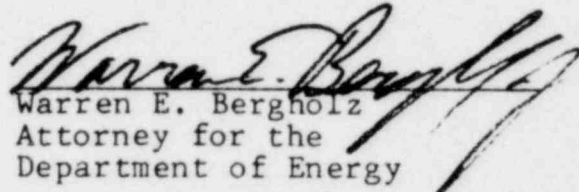
Copies of the documents identified above and those identified in Applicants' April 9, 1982 answer to Interrogatory No. 1, Set 17 will be made available for inspection and copying at the Office of General Counsel,

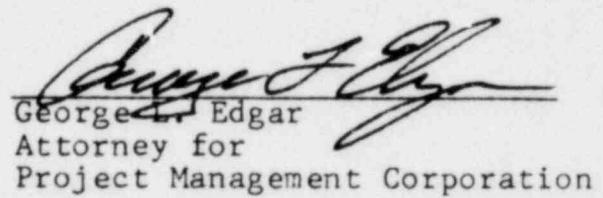
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<sup>\*/</sup> Applicants believe that additional documents 4 and 5 contain information which is beyond the scope of Contention 4 and which is unnecessary to an LWA decision. Having been unable to reach agreement after conferring with counsel for NRDC, Applicants have been required to file their Motion for A Protective Order, and accompanying Memorandum of Points and Authorities, dated April 26, 1982.

United States Department of Energy. Please contact Warren Bergholz (252-6975) to arrange for inspection and copying.

Respectfully submitted,

  
Warren E. Bergholz  
Attorney for the  
Department of Energy

  
George L. Edgar  
Attorney for  
Project Management Corporation

DATED: April 26, 1982



CRBRP CORRESPONDENCE

<u>LTR. NO.</u>	<u>DATE</u>	<u>SUBJECT</u>	<u>FROM-TO</u>
BD 60864	12/15/76	Industrial Security Design Criteria	Brolin to Riley
CSM 697	12/29/76	Clear Zones	Riley to Brolin
Bd 70143	2/11/77	CRBRP Industrial Security Criteria	Hellerung to Riley
BD 70165	2/16/77	CRBRP: Industrial Security System Response	Hellerung to Riley/ Caffey
EN 1577007	3/7/77	A&C Industrial Security Criteria	Riley to Brolin
EN 1577008	3/10/77	Security Hardware Meeting	Riley to Brolin
EB 70140	5/2/77	Implementation of Industrial Security Criteria	Hess to Aneja
EN 1577019	6/1/77	Pre CCB Meeting on Industrial Security	Penico to Multiple
Memo 1080	6/20/78	Summary of RC10-005 Industrial Security System	Penico to Riley
BD 81102	11/10/78	ECP for Changes to Security System	B&R to PO
EN 1579019	1/4/80	Forwarding of A&Cs on Security System	PO to B&R
EN 1579019	1/4/80	Forwarding A&Cs Concerning Security System	PO to B&R
ICT 80434	12/31/80	Discussed Ups for Security System	PO to B&R
PR 81184	2/25/81	Award of Security System Contract	PO to B&R
BP 10926	7/14/81	Forwards Changes to Security System, VIZ: Delete Glare Lights, Identifies Heat Load for HVAC	Ascher to Riley
RPS 81521	10/1/81	Gives Guidance on Procurement Actions/task B&R to Investigate Access Control Booth	PO to B&R
CM 82-034	2/8/82	Approval of SDD18 Ups	U/H/B&R

CRBRP ADDITIONAL DOCUMENTS

1. System Design Description 18  
"Radiological Security System"  
With 11 revisions, last revision dated 12/81 in five parts,  
all parts except Section 1 are safeguards information in  
accordance with 10 C.F.R. Part 73, Section 21.
2. 10 C.F.R. Part 11; Part 25; Part 50 (these applicable  
Paragraphs, 34(c), 34(d), 34(e); Part 70 (Paragraph 20a);  
Part 73 (these applicable Sections, 20, 21, 25, 26, 45,  
46, 55, 71, 72, 80. Appendices B and C); and Part 95 for  
applicable documents.
3. All appropriate SANDIA handbooks on Security System, E.G. Intrusion  
Detection System handbook SAND 76-0554 SANDIA, Nov. '76 as revised.



In the Matter of  
UNITED STATES DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY  
(Clinch River Breeder Reactor Plant)

CERTIFICATE OF SERVICE

Service has been effected on this date by personal delivery or first-class mail to the following:

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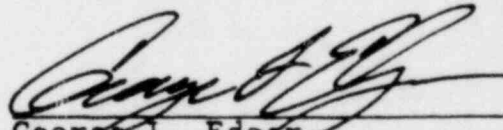
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DATED: April 26, 1982

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\*\*/ Denotes hand delivery to indicated address.