

PRM 50-59  
(59FR23641)

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Omaha Public Power District  
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402/636-2000

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July 18, 1994  
LIC-94-0137

Secretary, Docketing and Service Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

References: 1. Docket No. 50-285  
2. Federal Register Volume 59, No. 87, dated May 6, 1994

Dear Secretary:

SUBJECT: Comments from Omaha Public Power District (OPPD) on Proposed Changes to  
10 CFR Parts 50 and 73 Regarding Frequency for Conducting Independent  
Reviews and Audits of Safeguards Contingency Plan and Security Program

In Reference 2, the NRC solicited comments for proposed changes to 10 CFR 50 and 73 that would change the frequency at which each licensee conducts independent reviews and audits of its safeguards contingency plan and security program from annually to biennially.


OPPD supports these proposed changes. In addition, OPPD offers two other comments in support of the proposed rule changes. First, nuclear plants periodically conduct security drills which provide a performance-based method of verifying the implementation and effectiveness of the security program.

Secondly, by reducing the required frequency for independent audits, licensees would have more resources available to conduct self-assessments. This change would be in line with the NRC philosophy of supporting self-assessments over independent reviews as a better method of determining the effectiveness of licensee programs.

OPPD also supports further rulemaking as mentioned in the Supplementary Information Background section of the Federal Register. The additional NRC rulemaking would extend the audit frequency for several program areas to a maximum 36-month interval. This proposal would be consistent with OPPD's current practice of conducting Quality Assurance audits on a 36-month frequency.

If you should have any questions, please contact me.

Sincerely,

  
W. G. Gates  
Vice President

c: LeBoeuf, Lamb, Greene & MacRae  
L. J. Callan, NRC Regional Administrator, Region IV  
S. D. Bloom, NRC Project Manager  
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