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NRC-91-0161

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Submittal and Request for Approval of Fermi 2 Security
Personnel Training and Qualification Plan (Revision 7)

In accordance with 10CFR50.54(p)(2), Detroit Edison hereby submits the Fermi 2 Security Personnel Training and Qualification Plan (SPT&QP), Revision 7. Only the affected page (Appendix G, page G-1) is submitted. Changes to the text are highlighted (shaded).

This revision involves a change in the shotgun qualification course to require shooting from the shoulder instead of the hip position at the 15 yard line. The qualification requirements have also been increased from 50% to 70%. The proposed shotgun qualification course is different from that prescribed by 10CFR73, Appendix B which includes hip shooting. Qualification in accordance with 10CFR73, Appendix B is required initially and annually thereafter for certain members of the security force to meet the requirements of 10CFR73.55(b)(4)(i).

In accordance with 10CFR73.55(a), the Commission may authorize measures for protection against radiological sabotage other than those required by 10CFR73.55 if the licensee demonstrates that the measures have the same high assurance objective as specified in 10CFR73.55(a) and that the overall level of system performance provides protection against radiological sabotage equivalent to that which would be provided by paragraphs 10CFR73.55(b) through (h) and meets the general performance requirements of 10CFR73.55.

Detroit Edison has determined that the proposed change will not decrease the effectiveness of the current SPT&QP for the following reasons:

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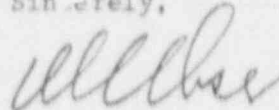
- 1) The revised course requires a higher level of proficiency to qualify than the current course of fire.
- 2) Shooting from the hip is inherently less accurate than shooting from the shoulder and should be discouraged when responding to a design basis threat of radiological sabotage. The likelihood of hitting a fellow officer responding to the same threat is also increased. When officers are qualified to fire from the hip position they are effectively being told that it's acceptable to respond to a threat in that manner. Detroit Edison Nuclear Security has determined that when responding to a threat with the inherently less accurate hip shooting method, the responding officer is less likely to stop an intruder than by shooting from the more accurate shoulder position. The endorsement of hip shooting implied by the current training program, therefore, reduces the potential effectiveness of response to a design basis threat. For these reasons, replacement of the hip shooting with shoulder shooting along with the increased accuracy requirements proposed for the SPT&QP improves the overall ability of the security organization to respond to a design basis threat of radiological sabotage.

As discussed above, since the effectiveness of the SPT&QP is not decreased, the proposed shotgun qualification course change results in a SPT&QP which meets the same high assurance objective specified in 10CFR73.55(a), provides protection against radiological sabotage equivalent to that provided by 10CFR73.55(b)(4) and meets the general performance requirements of 10CFR73.55.

Since the proposed change results in a shotgun qualification course that is different than the requirements of 10CFR73.55(b)(4)(i), Detroit Edison will not implement this change until the Nuclear Regulatory Commission determines the change to be acceptable pursuant to the requirements of 10CFR73.55(a).

If you have any questions regarding this submittal, please contact Mr. Joseph H. Korte, Deputy Director-Nuclear Security at (313) 586-4949.

Sincerely,



Enclosure

cc: T. G. Colburn (w/o encl.)
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APPENDIX G

SHOTGUN QUALIFICATION COURSE

There are 2 positions of fire for the Shotgun Course totaling 8 rounds. For each position 4 rounds of 00-buckshot shall be fired at 4 separate targets.

To qualify, the individual is required to place 75% of all pellets (51 pellets for the entire course) within the black silhouette of the NRA B-27E target, or similar target using an equivalent scoring method.

Shotgun Course

<u>Range</u> <u>(yd)</u>	<u>No. of</u> <u>Rounds</u>	<u>Position</u>	<u>Time</u> <u>(Sec)</u>
15	4	Shoulder	10
25	4	Shoulder	10