



0509  
L. Sauer  
**Entergy**

61 PR 16016  
April 10, 1996  
①  
**RECEIVED**

Entergy Operations, Inc.  
River Bend Station  
5485 U. S. Highway 61  
P.O. Box 220  
St. Francisville, LA 70775  
Tel 504 336 6225  
Fax 504 635 5068

1996 JUN -6 PM 3:26  
**RULES REVIEW & DIR. BR.  
USNRC**

**Rich J. King**  
Director  
Nuclear Safety & Regulatory Affairs

May 29, 1996

Rules Review and Directive Branch  
DFIPS  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Comments for Draft Regulatory Guide DG-5007  
(Proposed Revision 3 to Regulatory Guide 5.44)  
River Bend Station - Unit 1  
Docket No. 50-458

File No.: G9.5, G1.41.26

RBFI-96-0193  
RBG-42925

Gentlemen:

Enclosed are River Bend Station's comments concerning Draft Regulatory Guide (RG) DG-5007, "Perimeter Intrusion Alarm Systems".

If you have any questions or require additional information, please contact Mr. Howard Hutchens at (504) 336-6245.

Sincerely,

WJF/kvm  
enclosure

9606110401 960529  
PDR ADOCK 05000458  
P PDR

## Enclosure to RBG-42925

page 1 of 1

### Comments:

1. (C.1.4), "At power reactor sites only, cable pull boxes and termination points need not be tamper-protected if line supervision is used, unless there are splices at the location."

*The word "splices" should be changed to "terminations". A splice in a cable if installed correctly does not expose the wiring any more so than if the cable sheathing was cut open. A termination on the other hand allows the cable to be exposed to jumpering or shorting.*

2. (C.3.1), "Total number of tests 34, 52, and 67. Minimum number of successful detections 34, 51, and 65. Maximum number of failures detected 0, 1, and 2."

*In the previous RG 5.44, 30 out of 30 equated to 96% probability of detection with 95% confidence. It also only required a 10 test (total of 40) if there was a failure while this is requiring 18 (total of 52). The increase in testing should be justified.*

3. (C.3.2), "With this test option, one pass of a performance test is conducted in place of a weekly operational test." "Each segment should be tested by using a combination of all the applicable penetration approaches at the most vulnerable area at least once a week."

*Define "one pass". Is this a one test or is it referring to the full "34" test because further in the section it is stated to use a combination of approaches? Depending on how this is defined, the utilities will find this option to be more of a burden and will use Testing Option I as it is less manpower intensive thereby defeating the purpose of Testing Option II.*

4. (D), "However, no backfitting is intended or has been approved in connection with issuance of this guide; any backfitting that may result from imposition of the new position in this context must be separately justified in accordance with the criteria of 10CFR50.109 and approved NRC backfitting procedures."

*Though no backfitting is intended as stated above, most facilities are committed to testing and/or design in accordance with RG 5.44. Publication of this document as currently stated could cause changes to be made to testing programs and facility design.*