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NQA

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

SUBJECT: Louisiana Power & Light Comments
on Proposed Rule

REFERENCE: Changes in Safeguards Reporting Requirements,
10 CFR Parts 70, 72, 73 and 74

Dear Sir:

Louisiana Power & Light Company is pleased to provide for your consideration
the following comments with respect to the above reference.

In regard to:

10 CFR 73.71

Section (C)(1) Reporting of events within the Safeguards
System

- 1) Recorded in "24 hours" may in some instances prove too
restrictive. We recommend a minimum of 72 hours to
allow adequate time for management review.

Section (C)(2) Submitting of safeguard event log to the NRC

- 1) It is our feeling that a log submitted without full
explanations, as proposed, could result in misunder-
standings about events. Clearing up these misunder-
standings would be costly in manpower and other resources
to both the licensee and the NRC. Therefore we recommend
that the log remain on file with the licensee and made
available for audit by the NRC Resident Inspector and
Region Security Inspectors.

DS10

Add. G. L. Yardumian, 88155

P. A. Dwyer, 88155

Wm. Omslud, 9609 MNAE

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PDR PR PDR
70 50FR34708

10 CFR 73 Appendix G

Section 1(b) Failure of safeguards system

- 1) "Safeguards system" as stated is not defined within the code of Federal Regulations. However, it is defined in a draft Regulatory Guide but the definition provided is too encompassing.
- 2) The words "could allow" unauthorized or undetected access with respect to safeguards systems, as defined in the Regulatory Guide, requires a judgement determination. Existing regulation, 10 CFR 73.71 footnote 2 of Table 1, states "security features break down without proper compensation allowing unauthorized or undetected" access. This approach is clear and can be better understood and enforced by both the licensee and the NRC.

Section 1(c) Unauthorized entrees through a required barrier

- 1) The implication of "Any" unauthorized entries through a required barrier is too broad. This would include procedural errors by badged employees which would result in a one hour reporting requirement. We suggest that these are administrative problems and recommend that they be handled by the licensee.

Section II Description of events

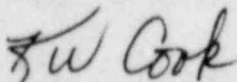
- 1) Same comments as stated under 10 CFR 73.71(c)(1).

Section II(a)

- 1) Same comments as stated under 10 CFR 73 Appendix G, Section I(b).

In closing we are in agreement with 10 CFR Parts 70, 72 and 74 as proposed.

Yours very truly,



K.W. Cook

KWC/MEP/pcl

cc: G.W. Knighton, B.W. Churchill, W.M. Stevenson, R.D. Martin, J. Wilson,
NRC Resident Inspector's Office (W-3)