



DOCKET NUMBER
PETITION RULE PRM 76-1
(65FR30018)

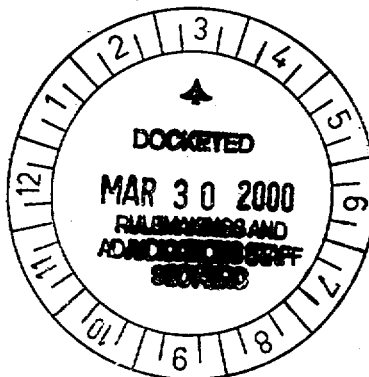
PRM-76-1

United Plant Guard Workers of America

Local 111

P. O. Box 1410

Paducah, Kentucky



March 13, 2000

Mr. William Travers
Executive Director for Operations
U.S. Nuclear Regulatory Commission

In accordance with 10 CFR 2.206 and other applicable regulations, we request the Commission modify 10 CFR 76 Subpart E for the following reasons:

- 1) The Paducah Gaseous Diffusion Plant processes Cat. III quantities of special nuclear material per 10CFR73.2. These type quantities require a minimum level of security per 10CFR73.67 to minimize the possibility for unauthorized removal of special nuclear material consistent with potential consequences. In accordance with 10CFR95, security is required for the protection of classified matter at the levels of CRD and SRD. These two security protocols are not similar.
- 2) A site that has both special nuclear material security concerns and classified matter concerns is not adequately addressed by 10CFR76 Subpart E. An example of this disconnect can be seen in the Controlled Access Area Fence line. The fence line serves as a minimum level of protection against unauthorized removal of special nuclear material in quantities of 10 and 20 ton cylinders. The portals and gates are in place to insure that personnel who gain access to the CAA are of the right clearance or are under escort. It is also designed for the purpose of ensuring that prohibited articles are not allowed into the controlled area. The missing element of security is whether the fence line, which does minimize the unauthorized removal of special nuclear material of 10 and 20 ton cylinders, adequately protects the unauthorized removal of restricted information, equipment and other materials or the unauthorized access to such materials. The two regulations were not merged appropriately to address a site that covers the protection of classified information, equipment and materials and special nuclear material.
- 3) Other Cat. III facilities regulated by the Commission do not share the level of concern for classified matter, equipment and technology that exists at Paducah. In order to protect this technology, security programs such as escort requirements and physical security measures should be more stringent.

4) The scope and complexity of our facility renders it far different from other NRC facilities. Accordingly, this presents unique problems in relying on local law enforcement agencies to protect our facility from violent incidents. The Commission typically relies on local law enforcement to respond to incidents of workplace violence or sabotage. The local law enforcement agencies in our area have stated for the record that due to a lack of knowledge of the plant site, the hazards contained in the plant and their limited resources, local law enforcement should not be viewed as a replacement for on site security response capability.

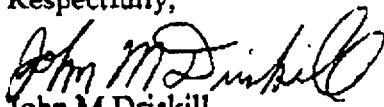
5) Should there be a violent incident or act of sabotage the national security interest will be affected because of the unique nature of the Gaseous Diffusion Plants and the importance of their continued operation.

6) There are many radiological and toxicological hazards associated with this plant. Should there be sabotage of any one of these, it could negatively influence the safety of the workers and the public. This did not appear to be addressed in the licensing process. Current NRC standards do not require a security force to be capable of preventing a sabotage event. We request that these requirements be changed to require an ability to detect, respond to and mitigate threats of this nature.

7) Current regulation does not require the security force to be armed or empowered to enforce the Atomic Energy Act. We request the Commission rules require security officers at the GDPs to be armed and empowered to make arrests in limited situations, such as for violations of the Atomic Energy Act.

We request that these changes be implemented as soon as possible. Thank you for your consideration.

Respectfully,



John M Driskill
Paducah Gaseous Diffusion Plant
President 111
United Plant Guard Workers of America
767 Dry Bridge Rd
Smithland KY 42081
270-928-2621 home
270-441-6246 work

cc: Site Resident Inspector
International Union
Congressional Delegation



FRANK AUGUSTUS
Sheriff of McCracken County

301 South 6th Street
McCracken County Courthouse
Paducah, Kentucky 42003

July 10, 1996

Bern Stapleton
Safeguard and Security Associate
United States Enrichment Corp.
6903 Rockledge Drive
Bethesda, MD 20817

Dear Mr. Stapleton:

It has recently been brought to my attention that Security personnel at the Paducah Gaseous Diffusion Plant may possibly lose their arrest authority and their ability to be armed. This issue causes me a great deal of concern.

I understand the police operation of the Paducah Gaseous Diffusion Plant is responsible for the protection of classified material, sensitive nuclear material, government property, and over 2,200 employees situated on 3,423 acres, including 748 acres of fenced area. In contrast, the McCracken County Sheriff's department is responsible for patrolling over 250 square miles in order to meet the needs of our County's citizens. Since I took office in 1994, citizens' calls for law enforcement have increased by 23,000 calls. Crime is on the rise in McCracken County and due to financial constraints, my department has only 17 full-time road deputies to handle these increases.

I am extremely concerned that if a major problem should arise at the Paducah Gaseous Diffusion Plant it would be extremely difficult for my department to provide proper security for such a sizable site until more enforcement could arrive. If a hostile situation should occur, I could not guarantee adequate personnel or response time due to our department's manpower shortage. When only seconds matter I am very much afraid it would take many minutes to adequately respond.

Another issue that must be addressed is our officers' lack of knowledge in regard to the actual facility and surrounding grounds. As noted above, the immense size of this facility poses many problems in regard to providing adequate safety to plant employees as well as my deputies.



FRANK AUGUSTUS
Sheriff of McCracken County

301 South 6th Street
McCracken County Courthouse
Paducah, Kentucky 42003


Page 2

July 10, 1996

In my opinion, the current security staff is of immense value to the safety of the plant facility and the employees that work within. I fully understand the move toward privatization necessitates many changes in operations that have been in place for many years. I would like to strongly recommend, however, that a long serious look be taken at proposed changes in the security force at the Paducah Plant before a final decision is made. I am sure that your utmost concern, as well as it is mine, is for the safety of the people of McCracken County as well as the safekeeping of the plant, whether it remains a government facility or is privatized in the future.

I would be more than happy to discuss this matter with you in more detail at your convenience. Please feel free to call me.

Very truly yours,


Frank Augustus
McCracken County Sheriff



Oct. 23, 1998

**1400 Broadway
P.O. Box 2267
Paducah, Kentucky
42002-2267**

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DRUG DIVISION
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TRAFFIC COORDINATOR
502-444-8638

Bill Richardson
U.S. Secretary of Energy
c/o Lockheed Martin
Kevill, KY 42053

Dear Secretary Richardson:

The Paducah Police Department has supported and will continue to support the Paducah Gaseous Diffusion Plant. There is an agreement of support signed by our current mayor to provide assistance to the plant in the event of an emergency.

However, the extent of our ability to respond is, at this time, limited.

In the event of a security emergency, our response time would be a minimum of 15 minutes. The number of officers able to respond would be minimal. We normally have seven officers working at any given time. Only a portion of those officers would be able to respond, as we could not strip the city and leave it without police protection.

We have no program in place for call-out of officers for an emergency. Our department has no special weapons team to field if needed.

We have agreed to provide a bomb technician if needed at the plant. However, he currently does not have a bomb suit.

All in all, our response would be dictated by our ability to contact officers at home. I am unable to provide a time parameter on their response.

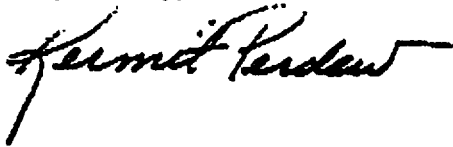
In years past, the capabilities, equipment and training of plant personnel made our response less critical. It placed us in a support role.

Richardson/ Page 2
Oct. 23, 1998

As Chief of Police of Paducah, I believe plant security should return to the level of preparedness at which they were in the past.

Current world and national affairs dictate that sleepy middle America can be a target. It is incumbent that plant security be prepared.

Respectfully,

A handwritten signature in cursive script, appearing to read "Kermit A. Perdew". The signature is written in dark ink and is positioned above the printed name and title.

Kermit A. Perdew
Chief of Police