

SAFEGUARDS INFORMATION

June 15, 2000

Mr. Michael R. Kansler
Vice President, Operations Support
Entergy Operations, Inc.
P.O. Box 31995
Jackson, MS 39286-1995

SUBJECT: ARKANSAS NUCLEAR ONE, UNITS 1 AND 2; GRAND GULF NUCLEAR STATION; RIVER BEND STATION; AND WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REVIEW OF PROPOSED INTEGRATED NUCLEAR SECURITY PLAN AND INTEGRATED SECURITY TRAINING AND QUALIFICATION PLAN (TAC NOS. MA6571, MA6572, MA6764, MA6750, AND MA6663)

Dear Mr. Kansler:

By letter dated September 7, 1999, Entergy Operations, Inc. (Entergy) submitted proposed Integrated Nuclear Security Plans (INSPs) to the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 50.90 as amendments to the Arkansas Nuclear One, Units 1 and 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford Steam Electric Station, Unit 3 licenses. The INSPs incorporate the physical security plans, safeguards contingency plans, and guard training and qualification plans into a consolidated security/contingency plan and a consolidated guard training and qualification plan for all sites. Entergy indicated that this would provide consistency in the security programs at these sites.

The NRC staff has completed its review of the INSPs. Due to the complexity of this review process, to determine the adequacy of the proposed INSPs against the regulatory requirements and the existing plan commitments, the staff has identified several categories of concerns which resulted in more than 200 comments, as follows. There are numerous changes where the proposed plan commitments do not meet the intent of the 10 CFR 73.55 regulations, including word changes contrary to the requirements, changes that have no regulatory basis, and changes that redefine existing regulatory language. A considerable amount of site-specific information has been deleted from the INSPs and replaced with generalized security program commitments making the INSPs neither inspectable nor enforceable. An entire section of an existing plan and other specific requirements have not been addressed in the proposed INSPs. All site drawings, security organization charts, shift staffing levels, and weapons qualification courses have been deleted. Existing plan commitments for a site's unique configuration were proposed in the INSPs, but can not be applied generically to the other sites. Also, existing NRC guidance has been utilized inconsistently and only when it is to the benefit of the INSPs' commitment.

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Based on the above information, the NRC staff has determined that the proposed INSPs are incomplete and inconsistent with the requirements in 10 CFR Part 73. The INSPs are, therefore, inadequate for review or approval. Accordingly, and as agreed to during a May 9, 2000, telephone conversation between Mike Krupa, Entergy, and Robert Gramm, NRC, it was determined that NRC's review process concerning Entergy's INSPs application will be changed to a pre-application review. The comments enclosed are for your consideration to address the concerns as noted.

The NRC staff believes that Entergy should be able to review and address a majority of the comments without discussion with the NRC staff. When the number of comments have been reduced to the more significant issues that need to be discussed with the staff, the staff will be willing to meet with you to resolve those comments. Following this proposed meeting, Entergy should then revise and resubmit the proposed INSPs for staff review.

The enclosure contains information that has been determined to be exempt from public disclosure in accordance with 10 CFR 73.21, Requirements for the protection of safeguards information. Therefore, it will not be placed in the NRC Public Document Room (PDR) and will receive limited distribution.

If you have any questions or suggestions regarding the above, please contact the Project Manager, Tom Alexion, at 301-415-1326.

Sincerely,

/RA/

Stuart A. Richards, Director
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-313, 368, 416, 458, and 382

Enclosure: Comments on Proposed INSPs

cc w/o encl: See next page

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