

RS-00-31



June 30, 2000

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: Byron Station Security Plan, Security Personnel Training and
Qualification Plan, and Safeguards Contingency Plan, Revision 54

In accordance with 10 CFR 50.54 (p)(2), "Conditions of licenses," we are submitting changes to the Commonwealth Edison (ComEd) Company Byron Station Security Plan, the Security Personnel Training and Qualification Plan, which is Appendix B to the Byron Station Security Plan, and the Safeguards Contingency Plan, which is Appendix C to the Byron Station Security Plan. In accordance with 10 CFR 50.4(b)(4), "Security plan and related submittals," attached are the original and three (3) copies of the Byron Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 54.

Revision 54, includes the following changes.

A change was made to the Security Plan, Section 7, "Access Controls," to accommodate the potential use of an off-site badge fabrication/in-processing facility.

A new requirement has been added to the Security Plan, Section 9, "Entrance Searching," which allows searched material and equipment to be transferred from one site to another without requiring an additional search at the receiving site, provided that the integrity of the original search is maintained. This new process meets the requirements of 10 CFR 73.55(d), "Access Requirements," and has been made in accordance with NUREG-0908, "Acceptance Criteria for the Evaluation of Nuclear Power Reactor Security Plans." This change does not exempt the vehicle transporting the material and equipment from search requirements.

Attachment 2 Contains Safeguards Information
Upon Separation This Page is Decontrolled

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The requirement to maintain certain special equipment (e.g., megaphones and riot helmets) has been revised. The equipment being removed from the Security Plan is primarily designed for events other than radiological sabotage (e.g., civil disturbance or demonstration) because the equipment is not used as part of the Byron Station's Security defensive strategy. Security effectiveness is not decreased by this change.

A new requirement has been added to the Security Plan, Section 6, "Gatehouse and Receiving Warehouse," which describes an alternate gatehouse configuration that may be applied during periods of high personnel traffic. During these times, the Protected Area barrier would be shifted allowing the East site of the gatehouse to be used as a temporary search and ingress area.

Editorial changes include the following.

- A clarification was added to the "bullet resistant" definition to include the minimum height specification from Underwriters Laboratories Standards for Safety, Bullet Resisting Equipment - UL 752. This clarification is consistent with NUREG-0908, "Acceptance Criteria for the Evaluation of Nuclear Power Reactor Security Plans."
- A clarification was added to the description of security patrols as they relate to the current 12-hour work schedule. The number of patrols being conducted was not reduced.
- To enhance the current defensive strategy, the minimum number of contingency weapons was increased.
- Byron Station will perform background screening for security vendor new employees in accordance with 10 CFR 73.56, "Personnel access authorization requirements for nuclear power plants," and the guidance specified in NUMARC 89-01, "Industry Guidelines for Nuclear Power Plant Access Authorization Programs." Byron Station's screening expectations for security vendor new employees, above the requirements of 10 CFR 73.56, were eliminated.
- Several word, title, and reference changes were made to the Security Personnel Training and Qualification Plan.
- Several reference changes were made to the Safeguards Contingency Plan resulting from Byron Station's implementation of new Security operating procedures.
- Other miscellaneous changes have been made that are considered "editorial" in nature. These changes effect terms and titles that are no longer applicable and do not decrease the overall level of security system performance.

As required by 10 CFR 50.54(p)(2), we have concluded that these changes do not decrease the safeguards effectiveness of the Byron Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan.

These changes to the Byron Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan were implemented on May 1, 2000. In accordance with 10 CFR 50.54 (p)(2), these changes shall be reported within 60 days of implementation (i.e., by June 30, 2000).

Attachment 2 contains Safeguards Information that must be protected from public disclosure as required by 10 CFR 73.21, "Requirements for the protection of safeguards information."

Should you have any questions concerning this letter, please contact Mr. J. A. Bauer at (630) 663-7287.

Respectfully,



R. M. Krich
Vice President – Regulatory Services

Attachment: Attachment 1, Byron Station Security Plan, Revision 54, Change Matrix
Attachment 2, Byron Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 54.

cc: Regional Administrator – NRC Region III (2 copies)