

ComEd

1400 Opus Place
Downers Grove, IL 60515

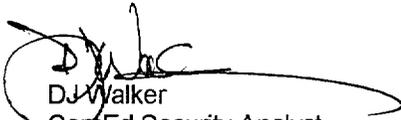
August 14, 2000

United States Nuclear Regulatory Commission
Region III
Regional Administrator
801 Warrenville Road
Lisle, IL 60532-4351

Dear Sir or Madam:

Enclosed please find the two cover letters that should accompany the Dresden Station Security Plan change (Revision 62, June 2000) and LaSalle County Station Security Plan change (Revision 62, June 2000) recently mailed to your office. If you have any questions, please contact me (630) 663-6140.

Sincerely,


DJ Walker
ComEd Security Analyst



RS-00-65

August 4, 2000

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

Dresden Nuclear Power Station, Units 1, 2, and 3
Facility Operating License Nos. DPR-2, DPR-19, and DPR-25
NRC Docket Nos. 50-10, 50-237, and 50-249

Subject: Dresden Nuclear Power Station Security Plan, Security Personnel
Training and Qualification Plan, and Safeguards Contingency Plan,
Revision 62.

In accordance with 10 CFR 50.4(b)(4), "Security plan and related submittals," attached are the original and three (3) copies of the Commonwealth Edison (ComEd) Company Dresden Nuclear Power Station (DNPS) Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 62.

Revision 62 includes changes described in the paragraphs below:

A change was made to the Security Plan, Section 7, "Access Controls," to accommodate the possible 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/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/equipment from search requirements.

Attachment 2 Contains Safeguards Information
Upon Separation This Page Is Declassified

DNPS has extended its independent audit interval within Section 15, "Security Audits," from 12 to 24 months based on the use and review of performance indicators. Changes which could adversely affect the security program will be reviewed in an independent audit as soon as reasonably possible but no longer than 12 months after the change occurs. This change is in response to the rule change to 10 CFR 73.55(g)(4), "Testing and maintenance," that was effective on April 28, 1999.

The requirement to maintain certain special equipment (e.g., megaphone, riot helmet) has been revised. The equipment being removed from the Security Plan is primarily designed for events other than radiological sabotage (e.g., civil disturbance, demonstration). Because the equipment is not used as part of Security's defensive strategy, security effectiveness is not decreased.

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.

DNPS 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." The DNPS screening expectations for security vendor new employees, above the requirements of 10 CFR 73.56, were eliminated.

Security Personnel Training and Qualification Plan: several word, title, and reference changes resulting from ComEd's revised Training and Qualification Plan.

Safeguards Contingency Plan: several reference changes resulting from ComEd's implementation of new Security operating procedures.

Other 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), "Conditions of licenses" we have concluded that these changes do not decrease the safeguards effectiveness of the DNPS Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan.

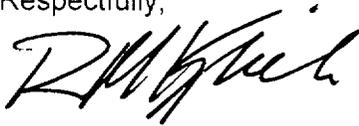
Attachment 2 Contains Safeguards Information
Upon Separation This Page Is Decontrolled

These changes to the DNPS Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan were implemented on June 15, 2000. In accordance with 10 CFR 50.54 (p)(2), these changes shall be reported within 60 days of implementation, i.e., August 14, 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. Joseph Sipek at (630) 663-3741.

Respectfully,



R. M. Krich
Vice President – Regulatory Services

Attachment: Attachment 1, Change Matrix for Dresden Nuclear Power Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 62.

Attachment 2, Dresden Nuclear Power Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 62.

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

Attachment 2 Contains Safeguards Information
Upon Separation This Page Is Decontrolled

ATTACHMENT 1

Dresden Nuclear Power Station Security Plan, Revision 62

Change Matrix

CHANGE NO.	DESCRIPTION OF CHANGE	SECURITY PLAN SECTION(S)	REASON FOR CHANGE
1.	<u>Editorial change</u> : clarification added to the "bullet resistant" definition.	1.7	To add minimum height specification from UL 752.
2.	<u>Editorial change</u> : clarification of security patrols as they relate to the current shift design; no reduction in the number of patrols conducted.	3.5.1	Implementation of 12-hour shifts.
3.	Badge control section amended to accommodate the use of an off-site badge fabrication/in-processing facility.	7.1.1.2	To be consistent with other ComEd Station Plan revisions.
4.	Added new section allowing the transfer of searched material / equipment between Protected Areas.	9.6	This change provides needed flexibility during outages.
5.	Extended the frequency of independent audits.	15.1	To comply with 10 CFR 73.55(g)(4)
6.	Eliminated the requirement to maintain certain special equipment.	Appendix B 5.3 9.4 Table B1 / B2 9.5 Table B1 / B2 9.7 Table B1 / B2 9.9 Table B1 / B2	This equipment is not designed or intended to be used as part of the defensive strategy.
7.	<u>Editorial change</u> : deleted the addendum that preceded Appendix B.	Appendix B Addendum	This addendum is no longer applicable due to changes in ComEd's expectations for the contractor vendor.
8.	<u>Editorial change</u> : added reference to Chapter 4 of Security Plan for employee suitability.	Appendix B 1.1	This reference was necessary due to the deletion of the addendum.

CHANGE NO.	DESCRIPTION OF CHANGE	SECURITY PLAN SECTION(S)	REASON FOR CHANGE
9.	<u>Editorial change</u> : eliminated ComEd's screening expectation for the contractor vendor regarding new employees.	<u>Appendix B</u> 1.1.4	Screening is conducted in accordance with 10 CFR 73.56.
10.	<u>Editorial change</u> : resulting from ComEd's revised Training and Qualification Plan.	<u>Appendix B</u> [Table B1] 2.1 [Table B1] 2.3 [Table B1] 2.5 [Table B1] 3.2 [Table B1] 11.1 [Table B1] 4.1 [Table B1] 5.2 [Table B1] 1.1 [Table B1] 1.3 [Table B1] 7.4 [Table B2] 1.1 [Table B2] 4.6 [Table B2] 11.1	Training and Qualification Plan was revised to create a consistent program at all ComEd stations.
11.	<u>Editorial change</u> : replaced references to security and contingency procedures.	<u>Appendix C</u> 2.2.1 & Table 4-1 2.2.2 & Table 4-2 2.2.3 & Table 4-3 2.2.4 & Table 4-4 2.2.5 & Table 4-5 2.2.6 & Table 4-6 2.2.7 & Table 4-7 2.2.8 & Table 4-8 2.2.9 & Table 4-9 2.2.10 & Table 4-10 2.2.11 & Table 4-11 2.2.12 & Table 4-12 2.2.13 & Table 4-13 2.2.14 & Table 4-14 2.2.15 & Table 4-15	Implementation of a new procedure series that resulted in new procedure numbers.



RS-0055

August 2, 2000

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: LaSalle County Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 62.

In accordance with 10 CFR 50.54 (p)(2), "Conditions of licenses," we are submitting changes to the Commonwealth Edison (ComEd) Company LaSalle County Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan. In accordance with 10 CFR 50.4(b)(4), "Security plan and related submittals," attached are the original and three (3) copies of Revision 62 of these plans.

Revision 62 includes the following changes.

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

The requirement to maintain certain special equipment (e.g. megaphone, riot helmet) has been revised. The equipment being removed from the Security Personnel Training and Qualification Plan is primarily designed for events other than radiological sabotage (e.g. civil disturbance, demonstration); because the equipment is not used as part of Security's defensive strategy, security effectiveness is not decreased.

Editorial changes:

- A clarification was added to the "bullet resistant" definition to include the minimum height specification from Underwriter's Laboratories Standards for Safety, Bullet Resisting Equipment – UL 752.

Attachment 2 Contains Safeguards Information
Upon Separation This Page is Decontrolled

- 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.
- Eliminated Commonwealth Edison (ComEd) Company's screening expectation for the security vendor regarding new employees.
- Security Personnel Training and Qualification Plan: several word, title, and reference changes resulting from ComEd's revised Training and Qualification Plan.
- Safeguards Contingency Plan: several reference changes resulting from ComEd's implementation of new Security operating procedures.
- Other 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 LaSalle County Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan.

These changes to the LaSalle County Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan were implemented on June 15, 2000. In accordance with 10 CFR 50.54 (p)(2), these changes shall be reported within 60 days of implementation, i.e., August 14, 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. Robert Brady at (630) 663-7205.

Respectfully,



R. M. Krich
Vice President – Regulatory Services

Attachment 2 Contains Safeguards Information
Upon Separation This Page is Decontrolled

Attachments: Attachment 1, Change Matrix for LaSalle County Station Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 62.

Attachment 2, LaSalle County Security Plan, Security Personnel Training and Qualification Plan, and Safeguards Contingency Plan, Revision 62.

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

Attachment 2 Contains Safeguards Information
Upon Separation This Page is Decontrolled

ATTACHMENT 1

LaSalle County Station Security Plan, Revision 62

Change Matrix

CHANGE NO.	DESCRIPTION OF CHANGE	SECURITY PLAN SECTION(S)	REASON FOR CHANGE
1.	<u>Editorial change</u> : clarification added to the "bullet resistant" definition.	1.6	To add minimum height specification from UL 752.
2.	<u>Editorial change</u> : clarification of security patrols as they relate to the current shift design; no reduction in the number of patrols conducted.	3.5.1	Implementation of 12-hour shifts.
3.	Badge control section amended to accommodate the use of an off-site badge fabrication/in-processing facility.	7.1.1.2	To be consistent with other ComEd Station Plan revisions.
4.	Eliminated the requirement to maintain certain special equipment.	Appendix B 5.3 9.4 Table B1 / B2 9.5 Table B1 / B2 9.7 Table B1 / B2 9.9 Table B1 / B2	This equipment is not designed or intended to be used as part of the defensive strategy.
5.	<u>Editorial change</u> : deleted the addendum that preceded Appendix B.	Appendix B Addendum	This addendum is no longer applicable due to changes in ComEd's expectations for the contractor vendor.
6.	<u>Editorial change</u> : added reference to Chapter 4 of Security Plan for employee suitability.	Appendix B 1.1	This reference was necessary due to the deletion of the addendum.
7.	<u>Editorial change</u> : eliminated ComEd's screening expectation for the contractor vendor regarding new employees.	Appendix B 1.1.4	Screening is conducted in accordance with 10 CFR 73.56.
8.	<u>Editorial change</u> : resulting from ComEd's revised Training and	Appendix B [Table B1] 2.1 [Table B1] 2.3 [Table B1] 2.5 [Table B1] 3.2	Training and Qualification Plan was revised to create

CHANGE NO.	DESCRIPTION OF CHANGE	SECURITY PLAN SECTION(S)	REASON FOR CHANGE
	Qualification Plan.	[Table B1] 11.1 [Table B1] 4.1 [Table B1] 5.2 [Table B1] 1.1 [Table B1] 1.3 [Table B1] 7.4 [Table B2] 1.1 [Table B2] 4.6 [Table B2] 11.1	a consistent program at all ComEd stations.
9.	<u>Editorial change</u> : replaced references to security and contingency procedures.	Appendix C 2.2.1 & Table 4-1 2.2.2 & Table 4-2 2.2.3 & Table 4-3 2.2.4 & Table 4-4 2.2.5 & Table 4-5 2.2.6 & Table 4-6 2.2.7 & Table 4-7 2.2.8 & Table 4-8 2.2.9 & Table 4-9 2.2.10 & Table 4-10 2.2.11 & Table 4-11 2.2.12 & Table 4-12 2.2.13 & Table 4-13 2.2.14 & Table 4-14 2.2.15 & Table 4-15	Implementation of a new procedure series that resulted in new procedure numbers.