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Waterford 3

W3F1-2001-0014
A4.05
PR

January 23, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Safeguards Evaluation of Security Presentation

Gentlemen:

On December 7, 2000, Entergy and the NRC staff discussed the status of the Confirmatory Order modifying license (EA-00-093) involving commitments to resolve issues with the Waterford 3 physical security program. The slide presentation used during this meeting was docketed via a letter from the Region IV office dated December 19, 2000, and placed in the Public Document Room and the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). Subsequent to this action, Entergy was requested to provide the basis for the non-safeguards classification of the slide presentation material.

Attached is Entergy's evaluation of the presentation, which concludes the information does not meet the criteria for Safeguards Information. This letter does not contain commitments.

Should you have any questions regarding this information, please contact Mr. Robert Fron at 504-739-6340 or Mr. David Madere at 504-739-6481.

Very truly yours,

Everett P. Perkins Jr.

E.P. Perkins, Jr.
Director
Nuclear Safety Assurance

EPP/DCM/rtk
Attachment

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cc: E.W. Merschoff, NRC Region IV
G.M. Good, NRC Region IV
N. Kalyanam, NRC-NRR
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N.S. Reynolds
NRC Resident Inspectors Office

Attachment 1 to
W3F1-2001-0014
Safeguards Evaluation of Security Presentation

Safeguards Evaluation of Waterford 3 Security Presentation

During the development of the presentation a specific and cognitive review of the presentation was conducted to ascertain safeguards applicability. A qualified security specialist of the Waterford 3 Security staff performed this review.

Per request, the elements of the presentation were again reviewed both individually and collectively against the requirements of 10CFR 73.21 (b)(1) (i - xiii). With respect to these subparagraphs, this information does not:

(i) represent the composite physical security plan,
(ii) substantially represent the final design features of the physical protection system,
(iii) provide details of alarm system layouts,
(iv) provide written physical security orders and procedures for members of the security organization, duress codes, and patrol schedules,
(v) provide details of the on-site and off-site security communications systems,
(vi) provide lock combinations and mechanical key design,
(vii) contain lists or locations of certain safety-related equipment explicitly identified in the documents as vital for purposes of physical protection,
(viii) represent the composite safeguards contingency plan,
(ix) represent portions of the facility guard qualification and training plan which disclose features of the physical security system or response procedures,
(x) represent response plans to specific threats detailing size, disposition, response times, and armament of responding forces,
(xi) identify the size, armament, and disposition of on-site reserve forces,
(xii) identify the size, identity, armament, and arrival times of off-site forces committed to respond to safeguards emergencies,
(xiii) represent information required by the Commission pursuant to 10 CFR 73.55 (c) (8) and (9).

It is our conclusion that the information in question does not substantially represent the final design features of the physical protection system. The majority of the physical features shown in the presentation is visible from outside the protected area or can be seen on a plant tour by a member of the general public. Development of a composite representation of the Waterford 3 Security Plan is not attainable through the use of the information in this document. Multiple hallways and stairwells exist through the plant proper and in several locations on each of the elevations listed. The captions are adequately generic to preclude a potential adversary from gaining useful tactical information from them. Therefore, this information does not meet the criteria for classification as Safeguards Information.