



February 5, 2004

10 CFR 50.54

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Palisades Nuclear Plant Suitability, Training and Qualification Plan, Revision 21

Nuclear Management Company, LLC (NMC) is transmitting two enclosures that comprise Revision 21 of the Palisades Nuclear Plant Suitability, Training and Qualification Plan. Enclosure 1 contains a description of, and rationale for, the changes included in Revision 21. Enclosure 2 contains one original and three copies of the revised pages of the Plan.

NMC has determined that the changes contained in Revision 21 do not decrease the safeguards effectiveness of the Palisades Suitability, Training and Qualification Plan. Accordingly, this revision is submitted under the provisions of 10 CFR 50.54(p)(2).

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.



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Nuclear Management Company, LLC

Enclosures (2)

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
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IE53

ENCLOSURE 1

**DESCRIPTION OF, AND RATIONALE FOR,
SUITABILITY, TRAINING AND QUALIFICATION PLAN CHANGES
REVISION 21**

4 Pages Follow

**Palisades Security
Procedure Change Summary**

Procedure

Palisades Suitability, Training and Qualification Plan

Revision Number

Revision 21

Summary of Changes

A detailed description of and justification for changes made in Suitability, Training and Qualification Plan, Revision 21, are included in the attached review package. Following is a summary of these changes.

- The rifle qualification course used by Security personnel has been changed to the NMC Fleet standard.

Comments

This revision reflects a change to the rifle qualification course. The review package provides justification for that change and explanation for why the change does not lessen Suitability, Training and Qualification Plan effectiveness. These changes do not impact plant operations or safety related equipment.



Procedure Sponsor

2-3-04
Date

10CFR50.54(p) SCREENING EVALUATION

Document/Revision: Palisades Nuclear Plant Security Training and Qualification Plan, Revision 21

Section/Title: Section 4.2 RIFLE

PROPOSED CHANGE(S): List of changes attached? Yes No

The rifle qualification course has been revised. The revised plan supersedes Suitability, Training and Qualification Plan, Revision 20. A comprehensive summary of changes made to the superseded plan is provided in ATTACHMENT 1.

IMPACT ON EFFECTIVENESS :

This section asks a series of questions. If the response to each question is "no" and the rationale supports a "no" response, the change may be processed using the provisions of 10 CFR 50.54(p) without NRC prior approval. The questions are as follows:

- 1. Yes No Does this change delete or contradict any regulatory requirement?
- 2. Yes No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10 CFR 73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a)?

Rationale: The rationale to support the answer "NO" for each change is provided in ATTACHMENT 1.

- 3. Yes No For any licensee that has NRC-approved security plan commitments as alternatives to one or more of the requirements of 10 CFR 73.55(b) through (h): Does this change decrease the overall level of security system performance needed to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a).

Rationale: No changes are being made to the NRC-approved Security Training and Qualification commitments which are alternatives to the requirements of 10CFR73.55(b) through (h).

- Yes No If the response to each question is "no" and the rationale supports the response, then the change may be processed under the provisions of 10CFR50.54(p) without prior NRC approval. If any response is "yes," then NRC approval is required prior to implementing the change. Is NRC approval required?

Review and Approval:

Completed By: Brian K. Nabholz Date: 1-23-04
Reviewed By: Janis Dourley Date: 2-4-04
Approved By: [Signature] Date: 2/4/04

ATTACHMENT 1: Assessment of Acceptability of 10 CFR Section 50.54(p) Changes to the Palisades Security Training And Qualification Plan

1. The following matrix correlates information contained in the applicable sections and paragraphs of the revised plan with the applicable sections and paragraphs of the superseded plan. A description of each change and, where required, the rationale for the "NO" response to question 2 of the 10 CFR Section 50.54(p) evaluation is provided.
2. A separate description is provided for changes and the rationale for the change is provided to include its impact on the overall level of security system performance specified in the Physical Security or Safeguards Contingency Plans.

PALISADES SECURITY TRAINING AND QUALIFICATION PLAN CHANGE MATRIX

| Change Number | Superseded TQP Reference | Revised TQP Reference | Change Description and Rationale |
|---------------|--------------------------|-----------------------|--|
| 1 | Section 4, 4.2 | Section 4, 4.2 | <p><u>Change:</u> Revised the rifle qualification course.</p> <p><u>Rationale:</u> The rifle qualification course has been changed. Nuclear Management Company has adopted a standard course to be used at all NMC sites. The Palisades Security Training and Qualification Plan is being revised to adopt this new qualification course. The course revision contains the following changes.</p> <ul style="list-style-type: none"> - The last four courses of fire do not have time restraints. This was changed to evaluate the precision shooting of the individual qualifying. - The last column of the course was revised to "Barricade Shooting Position" from "Shooting Position". - The items in the "Barricade Shooting Position" column had "barricade removed from their description. This description was added to the heading of the column. <p>Since there will be no change in actual weapons training for Security Officers, there is no decrease in the ability of the onsite physical protection system or security organization to protect with a high assurance against the design basis threat as stated in 10 CFR 73.1(a)(1).</p> |

ENCLOSURE 2

**PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN, REVISION 21
REVISED PAGES**

25 Pages Follow

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

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PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

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**NUCLEAR MANAGEMENT COMPANY
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**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
SUITABILITY, TRAINING AND QUALIFICATION PLAN**

Section 5
Revision 21
Page 12 of 14

TITLE: Weapons Qualification and Requalification Program

4.2 RIFLE

To qualify in use of the rifle, the individual must successfully complete the following course with a minimum score of 80% (i.e., 39 hits out of a possible 48 within the shaded area):

| STAGE | RANGE DISTANCE | NUMBER OF ROUNDS | TIME | BARRICADE SHOOTING POSITION |
|--|----------------|------------------|-----------|-----------------------------|
| 1 | 50 YARDS | 2 | 5 SECONDS | Standing, Strong Side |
| 2 | 50 YARDS | 2 | 5 SECONDS | Standing, Reaction Side |
| 3 | 50 YARDS | 2 | 5 SECONDS | Standing, Strong Side |
| 4 | 50 YARDS | 2 | 5 SECONDS | Standing, Reaction Side |
| Note: The number of "hits" on-target from the 50-yard line should be counted, recorded and covered over before continuing the course from the 25-yard line. | | | | |
| 5 | 25 YARDS | 2 | 5 SECONDS | Standing, Strong Side |
| 6 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Strong Side |
| 7 | 25 YARDS | 2 | 5 SECONDS | Standing, Strong Side |
| 8 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Strong Side |
| 9 | 25 YARDS | 2 | 5 SECONDS | Standing, Strong Side |
| 10 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Strong Side |
| 11 | 25 YARDS | 2 | 5 SECONDS | Standing, Strong Side |
| 12 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Strong Side |
| 13 | 25 YARDS | 2 | 5 SECONDS | Standing, Reaction Side |
| 14 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Reaction Side |
| 15 | 25 YARDS | 2 | 5 SECONDS | Standing, Reaction Side |
| 16 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Reaction Side |
| 17 | 25 YARDS | 2 | 5 SECONDS | Standing, Reaction Side |
| 18 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Reaction Side |
| 19 | 25 YARDS | 2 | 5 SECONDS | Standing, Reaction Side |
| 20 | 25 YARDS | 2 | 5 SECONDS | Kneeling, Reaction Side |
| 21 | 25 YARDS | 2 | N/A | Standing, Strong Side |

TITLE: Weapons Qualification and Requalification Program

| STAGE | RANGE DISTANCE | NUMBER OF ROUNDS | TIME | BARRICADE SHOOTING POSITION |
|-------|----------------|------------------|------|-----------------------------|
| 22 | 25 YARDS | 2 | N/A | Kneeling, Strong Side |
| 23 | 25 YARDS | 2 | N/A | Standing, Reaction Side |
| 24 | 25 YARDS | 2 | N/A | Kneeling, Reaction Side |

4.3 REQUALIFICATION

Individuals required to be armed in the performance of their security related duties shall be requalified in the use of their assigned weapons once every 12 months. This 12 month requalification period may be extended under the following conditions:

- a. the maximum allowable extension shall not exceed 25% (three months) of the 12 month requalification period and
- b. the combined time extension for any three consecutive 12 month requalification periods shall not exceed 3.25 times the 12 month requalification period. (12 months x 3.25 = 39 months in any three consecutive years).

The requalification will be in accordance with the provisions of Paragraphs 4.0 and 4.2 above the documented in accordance with Section 2, Step 2.2.4, "Individual Qualification (IQR)," and Section 2, Step 2.3, "Contract Personnel."