



GNRO-2010/00007

January 18, 2010

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

**SUBJECT: Request for Exemption from Physical Security Requirements (Redacted)
Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29**

Dear Sir or Madam:

By letter dated January 14, 2010 (GNRO-2010/00005), Entergy Operations, Inc. (Entergy) submitted a request for exemption from certain Physical Security Requirements for Grand Gulf Nuclear Station (GGNS). GNRO-2010/00005 was marked as security-related and Entergy requested it be withheld from public disclosure. Entergy is submitting this document as a version of that letter suitable for access; the information involving site specific security-related information has been removed. A redacted version of the letter and attachment follows.

In accordance with the requirements of 10CFR73.5, Entergy Operations, Inc. (Entergy) requests the NRC to approve an exemption from specific requirements of 10CFR Part 73, "Physical Protection of Plants and Materials," for Grand Gulf Nuclear Station (GGNS). The requested exemption extends the compliance date for the implementation of certain new security requirements issued by NRC in a final rule dated March 27, 2009 (74FR13926).

Pursuant to the final rule, the new security requirements must be implemented by March 31, 2010. Entergy has evaluated these new requirements and determined that the majority can be implemented by the March 31, 2010, compliance date. However, specific parts of the new requirements require more time to implement since they involve significant upgrades to the security system. These changes involve physical modifications that include []. The attachment to this letter provides additional details regarding the specific provisions of the rule for which an exemption is requested, as well as an environmental assessment.

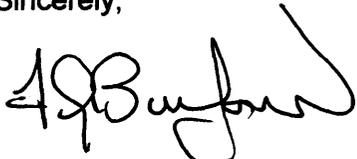
Entergy requests an extension from the March 31, 2010, implementation date to [] for full compliance for these specific requirements based on late delivery of critical security equipment by limited vendor resources and subsequent installation/testing time requirements and impact by the spring 2010 refueling outage at GGNS. Entergy's current

security program and the new security requirements being implemented by March 31, 2010, provide continued assurance of public health and safety and common defense and security.

Entergy requests approval of this exemption request by March 31, 2010, in order to avoid being in non-compliance with 10CFR73.55. The proposed exemption is requested to be effective upon issuance.

This letter contains no new commitments. If you have any questions or require additional information, please contact Christina Perino at 601.437.6299 or Jerry Burford at 601.955.8050.

Sincerely,



F.G. Burford, Acting Licensing Manager
FGB/rj

Attachments: Request for Exemption from a Physical Security Requirement

cc: NRC Senior Resident Inspector
Grand Gulf Nuclear Station
Port Gibson, MS 39150

U. S. Nuclear Regulatory Commission
ATTN: Mr. Elmo E. Collins, Jr.
Regional Administrator, Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

U. S. Nuclear Regulatory Commission
ATTN: Mr. Carl F. Lyon, NRR/ADRO/DORL
ATTN: ADDRESSEE ONLY
ATTN: U.S. Postal Delivery Address Only
Mail Stop OWFN/8 B1
Washington, DC 20555-0001

**Attachment
to**

GNRO-2010/00007

Request for Exemption from a Physical Security Requirement

Request for Exemption from a Physical Security Requirement

A. Background

The NRC issued a final rule for new security requirements in the Federal Register dated March 27, 2009. Pursuant to 10CFR73.55(a)(1) of the final rule, the new security requirements are required to be implemented by March 31, 2010. These requirements will require plant modifications and upgrades to the plant security infrastructure to ensure full compliance with these revised requirements and to provide the needed defense in depth to address the dynamics of the Design Basis Threat (DBT) and Adversarial Characteristic Description (ACD). Entergy has evaluated these new requirements and determined that the majority can be implemented by the required date; however, Entergy has determined that implementation of specific requirements requires additional time beyond March 31, 2010.

B. GGNS Security System Upgrade

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Due to limited vendor resources, not all security upgrades can be delivered and implemented at the Grand Gulf Nuclear Station (GGNS) before March 31, 2010. Some of the components are not required by regulation and are not required to be fully implemented by March 31, 2010. This attachment only addresses exemptions for those items required by the regulations.

C. Proposed Exemption

Entergy requests an exemption for GGNS, from the compliance date only, for three items listed in this section. The current GGNS security program and the new upgrades being implemented by March 31, 2010, provide continued assurance of public health and safety and common defense and security. Accordingly, the requested exemption is authorized by law and does not endanger life or property or the common defense and security in accordance with 10CFR73.5.

With the exception of the three items discussed below, the 10CFR Part 73 provisions will be satisfied by March 31, 2010, as required by the regulation. Full implementation for the three exemptions is planned for []. With NRC approval of this request for exemption, GGNS would then be in full compliance with the final rule at that time.

Item 1

Regulation

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Issue

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Item 2

Regulation

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Issue

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Item 3

Regulation

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Issue

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Conclusion

In lieu of full compliance with these three provisions of 10CFR73.55, Entergy is maintaining the GGNS site protective strategy in accordance with the GGNS Security Plan. The GGNS site protective strategy has been approved by the NRC staff as providing a high assurance for the protection of the facility and public from the effects of radiological sabotage. Therefore, the current GGNS security program and the new upgrades being implemented by March 31, 2010, provide continued assurance of public health and safety and common defense and security.

D. Basis for Proposed Exemption

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[] Entergy is continuing efforts to implement the remaining new Part 73 requirements identified in the March 27, 2009, Federal Register Notice (final rule) and associated Regulatory Guides issued in July 2009, by March 31, 2010.

Milestone Schedule

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E. Environmental Assessment

Entergy is requesting an exemption for GGNS in accordance with 10CFR73.5, "Specific Exemptions." The requested exemption is schedule-driven in nature and would defer the compliance date for three specific provisions of 10CFR73.55 from March 31, 2010, to [] for final compliance. The proposed exemption is needed to allow additional time for the design and installation of security modifications.

GGNS's current security program and the new requirements being implemented by March 31, 2010, provide continued assurance of public health and safety and common defense and security.

Deferral of the compliance date for three specific provisions of 10CFR73.55 is a schedule change only and, therefore does not result in any physical changes to structures, systems, components, or land use at GGNS. The deferral of the compliance date does not involve:

- any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment,
- any change to liquid or gaseous radioactive effluents discharged to the environment,
- any change in the type or quantity of solid radioactive waste generated,
- any change in occupational dose under normal or design basis accident conditions
- any change in the public dose under normal or design basis accident conditions,
- or any land disturbance.

Conclusion

There is no significant radiological environmental impact associated with the proposed schedule exemption. The proposed exemption does not affect non-radiological plant effluents or any historical sites.