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10 CFR 52.3
10 CFR 52.79
10 CFR 73.21

August 30, 2010
NRC3-10-0041

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

References: 1) Fermi 3
Docket No. 52-033
2) Letter from Peter W. Smith (Detroit Edison) to USNRC, "Detroit Edison
Company Response to NRC Requests for Additional Information Letter No. 29,"
NRC3-10-0021, dated May 17, 2010

Subject: Detroit Edison Company Submittal of Information Relating to Physical Security
Combined License (COL) Action Items

Revision 6 of the General Electric-Hitachi (GEH) Economic Simplified Boiling Water Reactor (ESBWR) Design Control Document (DCD) contained a number of new COL Applicant Items in Section 13.6 relating to physical security. In Revision 2 of the Fermi 3 COL Application (COLA), Detroit Edison elected to provide information to address some of the new COL Applicant Items at a later date. In response to NRC RAI 13.06.01-21 contained in Reference 2, Detroit Edison committed to providing information to address COL Applicant Items 13.6-8-A, 13.6-16-A and 13.6-17-A by August 31, 2010. The enclosures to this letter contain the information to address the applicant items as summarized below.

COL Action Item 13.6-8-A, "No Single Act Requirement for CAS and Secondary Alarm Station," requires that the COL Applicant demonstrate that the design of the security system precludes any

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single postulated security event resulting in an unacceptable degradation of the site security staff's ability to monitor and direct the response to a security event from either the Central Alarm Station (CAS) or Secondary Alarm Station (SAS).

The information contained in Enclosure 1 provides a description and analysis that demonstrates that the No Single Act Requirement for CAS and SAS is met.

COL Action Item 13.6-16-A, "External Bullet Resisting Enclosures," requires that the COL Applicant provide a site arrangement drawing that shows the location of the external Bullet Resisting Enclosures (BREs) and indicates the fields of fire from these locations. In addition, the COL Applicant will provide a description of the level of protection provided to security personnel stationed in the BREs from the effects of the equipment available to adversaries utilizing the Design Basis Threat (DBT) toolkit.

Enclosure 2 provides the site arrangement drawing with the required information. Figure 1-3 of the Fermi Physical Security Plan (PSP) will be revised to include the information in this enclosure.

The BREs are designed to be bullet resisting as described in Section 12 of the Fermi PSP. In addition, the BREs will be located at a distance from the Vehicle Barrier System (VBS) and the Protected Area (PA) fence such that they will provide adequate protection to security personnel stationed in the BREs from the DBT described in Regulatory Guide 5.69. Section 8 of Appendix C of the Fermi PSP will be revised to include this information.

COL Action Item 13.6-17-A, "Site Specific Locations of Security Barriers," requires that the COL Applicant provide a site arrangement drawing that shows the location of the Protected Area (PA) fence, the isolation zone on either side of the fence, the Vehicle Barrier System (VBS), any Red Zone or Delay Fences, and any buildings or structures inside the PA that are not part of the Certified Design. In addition, the COL Applicant will identify a milestone for demonstrating that the security strategy described in the ESBWR Safeguards Assessment Report remains valid.

Enclosure 2 provides the site arrangement drawing with the required information.

The milestone for demonstrating that the security strategy described in the ESBWR Safeguards Assessment Report remains valid is contained in Enclosure 3.

Detroit Edison intends to incorporate the information contained in the enclosures to this letter into Part 2 and Part 8 of the COLA in the next COLA revision.

Enclosures 1 and 2 of this letter contain safeguards information and should be withheld from public disclosure in accordance with 10 CFR 73.21.

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If you have any questions, or need additional information, please contact me at (313) 235-3341.

I state under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of August, 2010.

Sincerely,



Peter W. Smith, Director
Nuclear Development – Licensing & Engineering
Detroit Edison Company

Enclosures: 1) Analysis of the No Single Act Requirement for CAS and SAS
2) Fermi Site Protected Area Arrangement Drawing
3) Markup of the Detroit Edison COLA

cc: Adrian Muniz, NRC Fermi 3 Project Manager (w/o Enclosures 1 and 2)
Jerry Hale, NRC Fermi 3 Project Manager (w/o Enclosures 1 and 2)
Bruce Olson, NRC Fermi 3 Environmental Project Manager (w/o Enclosures)
Fermi 2 Resident Inspector (w/o Enclosures)
NRC Region III Regional Administrator (w/o Enclosures)
NRC Region II Regional Administrator (w/o Enclosures)
Supervisor, Electric Operators, Michigan Public Service Commission (w/o Enclosures)
Michigan Department of Natural Resources and Environment
Radiological Protection Section (w/o Enclosures)

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