

**From:** Ennis, Rick  
**Sent:** Thursday, August 16, 2012 10:01 AM  
**To:** David Helker  
**Cc:** Glenn Stewart (glenn.stewart@exeloncorp.com)  
**Subject:** Limerick Generating Station, Units 2 and 3 - Request for Additional Information Regarding July 12, 2012 Security Plan Submittal

Dave,

By letter dated July 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12198A301), Exelon Generation Company, LLC (the licensee) submitted the Limerick Generating Station's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 9. The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission (NRC) staff is currently reviewing the submittal to ensure compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(p)(2). The NRC staff has determined that the additional information requested below is needed to complete its review.

The NRC staff requests that you provide a response to this request within 30 days from the date of this e-mail. If you are unable to meet the requested response date or if you would like a conference call to discuss this request, please contact me at (301) 415-1420.

Thanks,

Richard B. Ennis, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

### **REQUEST FOR ADDITIONAL INFORMATION**

1. In section 11.3 of the PSP, the licensee describes protected area (PA) barriers. The plan describes additional areas where buildings, walls, and roofs comprise a portion of the PA barrier that were not described in Revision 8 of the PSP. This change was not described in the Description of Changes Report in Revision 9. Provide an explanation of the change. Was this change evaluated to ensure it complies with 50.54(p)(2)?
2. In section 15.1 of the PSP, the licensee describes illumination at Limerick Generating Station. Describe how the use of alternative technology for the assessment of the PA perimeter in no-light or low-light conditions meets the requirements 10 CFR 73.55(e)(7)(i)(C) and 73.55(i)(2). Describe the technology used for assessment of the PA perimeter in no-light or low-light conditions. Additionally, the licensee should make appropriate changes during the next revision of the site's PSP to ensure the language clearly describes what technology is used for assessment of the PA perimeter in no-light or low light conditions in accordance with 10 CFR 73.55(c)(3).
3. In section 15.5.1 of the PSP, the licensee describes owner controlled area (OCA) surveillance methods. The second numbered paragraph does not adequately address the

language in the bracketed text of NEI 03-12, Revision 7; it solely discusses facility procedures. Describe what equipment and/or personnel are used for OCA surveillance. Also, the licensee should make appropriate changes during the next revision of the site's PSP to ensure the language clearly describes the equipment and/or personnel used for OCA surveillance what technology in accordance with 10 CFR 73.55(c)(3).

4. In section 4.1.2 of the SCP, the licensee describes the security chain of command and delegation of authority. The description of the security chain of command and delegation of authority in Revision 8 of the SCP is different than in Revision 9. This change was not described in the Description of Changes Report in Revision 9. Provide an explanation of the rationale for the change. Describe who is responsible for command and control when the individuals listed are not available. Additionally, the licensee should make appropriate changes during the next revision of the site's SCP to ensure the language clearly describes the security chain of command and delegation of authority in accordance with 10 CFR 73.55(c)(5).
5. In section 5.4 of the SCP, the licensee describes facility operations personnel response. The description of training in Revision 8 of the SCP is different than in Revision 9. This change was not described in the Description of Changes report in Revision 9. Provide an explanation of the change. Was this change evaluated to ensure it complies with 50.54(p)(2)? The licensee should make appropriate changes during the next revision of the site's SCP section 5.4 to ensure the language clearly describes the training related to facility operations personnel response in accordance with 10 CFR 73.55(c)(5).
6. In section 7 of the SCP, the licensee describes their OCA vehicle checkpoint. It is unclear from the language whether the OCA vehicle checkpoint meets the requirements of 10 CFR 73.55(h)(2)(iii) and (h)(2)(v). Describe the OCA vehicle checkpoint and how it meets the requirements of 10 CFR 73.55(h)(2)(iii) and 10 CFR(h)(2)(v). Additionally, the licensee should make appropriate changes during the next revision of the site's SCP to ensure to ensure the language clearly describes the OCA vehicle checkpoint in accordance with 10 CFR 73.55(c)(5).