



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 6, 2012

Mr. Michael J. Pacilio  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: OYSTER CREEK NUCLEAR GENERATING STATION - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING SECURITY PLAN, TRAINING AND  
QUALIFICATION PLAN, AND SAFEGUARDS CONTINGENCY PLAN,  
REVISION 12 (TAC NO. D91660)

Dear Mr. Pacilio:

By letter dated July 13, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12198A298), Exelon Generation Company, LLC (the licensee) submitted the Oyster Creek Nuclear Generating Station's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 12. 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), and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. The draft questions were sent via email on August 16, 2012 (ADAMS Accession No. ML122290308), to Mr. Tom Loomis of your staff, to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. During a discussion with Mr. David Helker of your staff on August 20, 2012, it was agreed that you would provide a response within 30 days from the date of this letter.

Please note that if you do not respond to this letter by the agreed-upon date or provide an acceptable alternate date in writing, the NRC may reject your amendment request under the provisions of 10 CFR 2.108, "Denial of application for failure to supply information."

M. Pacilio

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-3100 or via e-mail at [John.Lamb@nrc.gov](mailto:John.Lamb@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb". The signature is fluid and cursive, with the first name "John" being the most prominent.

John G. Lamb, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO SECURITY PLAN, TRAINING AND QUALIFICATION PLAN, AND  
SAFEGUARDS CONTINGENCY PLAN, REVISION 12 FOR  
OYSTER CREEK NUCLEAR GENERATING STATION  
EXELON GENERATING COMPANY, LLC  
DOCKET NO. 50-219

By letter dated July 13, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12198A298), Exelon Generation Company, LLC (the licensee) submitted the Oyster Creek Nuclear Generating Station's (Oyster Creek) Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 12. 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), and has determined that additional information is required to complete the review. The specific information requested is below.

REQUEST FOR ADDITIONAL INFORMATION

1. In Section 11.3 of the PSP, the licensee describes protected area (PA) barriers. The plan describes areas where there is no isolation zone in accordance with 10 CFR 73.55(e)(8)(iv). Describe any other "buildings and/or structures" that do not have an isolation zone. Additionally, the licensee should make appropriate changes during the next revision of the site's PSP to ensure that the language clearly describes any building or structures that do not have an isolation zone in accordance with 10 CFR 73.55(c)(3).
2. In Section 15.1 of the PSP, the licensee describes illumination at Oyster Creek. 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.
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 in accordance with 10 CFR 73.55(c)(3).

Enclosure

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 11 of the SCP is different than in Revision 12. 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 11 of the SCP is different than in Revision 12. This change was not described in the Description of Changes report in Revision 12. 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 that 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 that the language clearly describes the OCA vehicle checkpoint in accordance with 10 CFR 73.55(c)(5).
7. In Section 7 of the SCP, the licensee describes assessment capabilities of the security officers in the bullet-resistant enclosures (BREs). Are these assessment capabilities separate and distinct from meeting the requirements of 10 CFR 73.55(i)(1) and 10 CFR 73.55(i)(2)? Describe the assessment capabilities and the requirements of the security officers in BREs and the assessment capabilities of the alarm stations. Additionally, the licensee should make appropriate changes during the next revision of the site's SCP to ensure that the language clearly articulates the assessment capabilities to the security officers in BREs and those in the alarm stations in accordance with 10 CFR 73.55(c)(5).

M. Pacilio

- 2 -

If you have any questions regarding this letter, please feel free to contact me at (301) 415-3100 or via e-mail at John.Lamb@nrc.gov.

Sincerely,

*/ra/*

John G. Lamb, Senior Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-219

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

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**ADAMS Accession No. ML12229A433**

\*via email

OFFICE	LPL1-2/PM	LPL1-2/LA	NSIR	LPL1-2/BC
NAME	JLamb	ABaxter* w/comments	ARoundtree*	MKhanna
DATE	09/04/12	08/30/12	08/16/12	09/06/12

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