

NRR-PMDAPEm Resource

From: DiFrancesco, Nicholas
Sent: Thursday, August 30, 2012 9:41 AM
To: joseph.bauer@exeloncorp.com; 'Mitchel.Mathews@exeloncorp.com'
Cc: 'David.Gullott@exeloncorp.com'; Roundtree, Amy; Mozafari, Brenda; Dudek, Michael
Subject: Dresden, LaSalle, and Quad Cities, DRAFT Request for Additional Information Related to Physical Security Plans

Mr. Bauer, and Mr. Mathews,

Please find below the staff's draft requests for additional information related to the Dresden, LaSalle, and Quad Cities Physical Security Plans (PSPs) dated July 13, 2012. The information below is being requested to support the NRC staff review of the PSPs to ensure compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(p)(2). Please advise by September 6, if a clarification call is needed to support the information request. These draft requests are being provided to facilitate clarification discusses if needed between NRC and Exelon staff.

Sincerely,

Nicholas DiFrancesco

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U.S. Nuclear Regulatory Commission
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NSIR REVIEW - TAC D91660

10 CFR 50.54(p)(2) CHANGES TO SECURITY PLAN

EXELON GENERATION CO, LLC

DRESDEN, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

LICENSE NOS. DPR-19 AND DPR-25

By letter dated July 13, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12198A296), Exelon Generation Company, LLC (the licensee) submitted the Dresden Nuclear Power Station's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 11. 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.

1. In section 14.5 of the PSP, the licensee describes vital areas at Dresden Nuclear Power Station. The list of vital areas in Revision 10 of the PSP is different than in Revision 11. This change was not adequately described in the Description of Changes Report in Revision 11. Provide an

explanation of the rationale for the change and how this change was evaluated to ensure it complies with 50.54(p)(2).

2. In section 15.1 of the PSP, the licensee describes illumination at Dresden Nuclear Power 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 10 of the SCP is different than in Revision 11. This change was not described in the Description of Changes Report in Revision 11. 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 10 of the SCP is different than in Revision 11. This change was not described in the Description of Changes report in Revision 11. 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).

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10 CFR 50.54(p)(2) CHANGES TO SECURITY PLAN

EXELON GENERATION CO, LLC

LASALLE COUNTY STATION, UNITS 1 AND 2

DOCKET NOS. 50-373 AND 50-374

LICENSE NOS. NPF-11 AND NPF-18

By letter dated July 13, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12198A297), Exelon Generation Company, LLC (the licensee) submitted the LaSalle County Station's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 13. 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.

1. In section 14.5 of the PSP, the licensee describes vital areas at LaSalle County Station. The list of vital areas in Revision 12 of the PSP is different than in Revision 13. This change was not described in the Description of Changes Report in Revision 13. Provide an explanation of the rationale for the change and how this change was evaluated to ensure it complies with 50.54(p)(2).
2. In section 14.5 of the PSP, the licensee describes vital areas at LaSalle County Station. The list of vital areas in Revision 12 does not list the control room as a vital area as required in 10 CFR 73.55(e)(9)(v)(A). Describe how the control room meets 10 CFR 73.55(e)(9)(v)(A). Additionally, the licensee should make appropriate changes during the next revision of the site's PSP to ensure the language clearly lists the control room as a vital area in accordance with 10 CFR 73.55(e)(9)(v)(A).
3. In section 15.1 of the PSP, the licensee describes illumination at LaSalle County 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).
4. 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).
5. 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 12 of the SCP is different than in Revision 13. This change was not described in the Description of Changes Report in Revision 13. 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).
6. In section 5.4 of the SCP, the licensee describes facility operations personnel response. The description of training in Revision 12 of the SCP is different than in Revision 13. This change was not described in the Description of Changes report in Revision 13. 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).
7. 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).

NSIR REVIEW - TAC D91660

10 CFR 50.54(p)(2) CHANGES TO SECURITY PLAN

EXELON GENERATION CO, LLC

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS 50-254 and 50-265

LICENSE NOS DPR-29 and DPR-30

By letter dated July 13, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12199A013), Exelon Generation Company, LLC (the licensee) submitted the Quad Cities Nuclear Power 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.

1. In section 11.1 of the PSP, the licensee describes Owner Controlled Area (OCA) barriers. The licensee describes a wire that has the capability of being alarmed. Is the wire actually alarmed? Describe the normal configuration of the wire. Additionally, the licensee should make appropriate changes during the next revision of the site's PSP to ensure the language clearly describes how the wire is configured in accordance with 10 CFR 73.55(c)(3).
2. In section 15.1 of the PSP, the licensee describes illumination at Quad Cities Nuclear Power 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 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).

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Mail Envelope Properties (Nicholas.DiFrancesco@nrc.gov20120830094100)

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