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Fax: 724-643-8069November 13, 2012
L-12-413

10 CFR 50.54(p)(2)

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

SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Response to October 11, 2012 NRC Request for Additional Information Regarding
10 CFR 50.54(p)(2) Changes to the BVPS Security Plans

Attached is the reply to the October 11, 2012 NRC letter which requested additional information regarding the August 1, 2012 FirstEnergy Nuclear Operating Company (FENOC) submittal of the Beaver Valley Power Station Physical Security Plan Revision 12 changes in accordance with 10 CFR 50.54(p)(2).

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Darin M. Benyak, Manager – Regulatory Compliance at 724-682-4284.

Sincerely,



Paul A. Harden

Attachment:

Response to October 11, 2012 NRC Request for Additional Information Regarding
10 CFR 50.54(p)(2) Changes to the BVPS Security Planscc: NRC Region I Administrator
NRC Senior Resident Inspector
NRR Project ManagerS001A
NRR

ATTACHMENT
L-12-413

Response to October 11, 2012 NRC Request for Additional Information
Regarding 10 CFR 50.54(p)(2) Changes to the BVPS Security Plans
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By letter dated August 1, 2012 (Agencywide Documents Access and Management System Accession No. ML 12216A358), FirstEnergy Nuclear Operating Company (the licensee), submitted Beaver Valley Power Station's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan, Revision 12. The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission (NRC, or Commission) 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.

Background/Regulatory Basis:

Consistent with 10 CFR 73.55(c)(1)(i), the licensee's security plans must describe how the licensee will implement requirements of this section through the establishment and maintenance of a security organization, the use of security equipment and technology, the training and qualification of security personnel, the implementation of predetermined response plans and strategies, and the protection of digital computer and communication systems and networks.

Consistent with 10 CFR 73.55(d)(3), the licensee may not permit any individual to implement any part of the physical protection program unless the individual has been trained, equipped, and qualified to perform their assigned duties and responsibilities in accordance with Appendix B of 10 CFR Part 73 and the T&QP.

Consistent with 10 CFR Part 73, Appendix B, Criteria VI, A.3, the licensee shall establish, maintain, and follow a Commission-approved T&QP, describing how the minimum training and qualification requirements set forth in this appendix will be met, to include the processes by which all individuals will be selected, trained, equipped, tested, and qualified.

Request for Additional Information:

- 1. The critical task matrix (CTM) in the T&QP lists duty positions at the site and the critical tasks for the training and qualification of members of the security organization, consistent with 10 CFR Part 73, Appendix B, Criteria VI. The CTM identifies the conduct of critical task training and qualifications for the duty position of the Alarm Station Operator (ASO). The CTM indicates that critical tasks 17, 18 and 19 are not required for this position. In Section 4.1 of the PSP, the description of the ASO indicates that one or more of these critical tasks are a function within the duties and**

responsibilities of ASOs at the site. If this is an administrative oversight, confirm that the ASOs at the site perform these duties and responsibilities and are required to be trained and qualified in these critical tasks. If the ASOs are not assigned these duties and responsibilities, describe the duty position that is assigned to perform the duties and responsibilities associated with critical tasks 17, 18, and 19, and describe how these personnel are trained and qualified to perform these duties. In addition, appropriate changes should be made during the next revision of the site's PSP and T&QP to ensure that the language clearly describes the duties and responsibilities for each duty position and the minimum training and qualification requirements associated with each duty position.

Response:

A review conducted in response to the Request for Additional Information determined that an administrative error occurred during finalization of Revision 12 of the Beaver Valley Power Station (BVPS) Physical Security Plan (PSP). As a result of this error, the NEI 03-12 security plan template markings (brackets and Xs) were incorrectly left in the critical task matrix (CTM) submitted in Revision 12 of the BVPS PSP. Therefore, Tasks 17, 18, and 19 were shown with bracketed Xs in the critical task matrix (CTM) indicating that they were not required, when in fact they are required and are performed by the BVPS Alarm Station Operators (ASOs). It was confirmed that the BVPS ASOs are trained, qualified and perform Tasks 17, 18 and 19. This issue has been captured in the corrective action program (CR 2012-16418). BVPS, PSP Revision 13 is being developed to correct this error and will be submitted to the NRC within 60 days of its effective date in accordance with 10 CFR 50.54(p)(2).