

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

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION

DOCKET NO. 50-285

LICENSE NO. DPR-040

By letter dated January 7, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13010A509), Omaha Public Power District submitted the Fort Calhoun Station's Physical Security Plan (PSP), Training and Qualification Plan, and Safeguards Contingency Plan (SCP), Revision 20. 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. Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

In the deviation/revision table of the security plans, the third deviation/revision listed in the table does not appear to exist within Section 1.1 of the PSP, nor does it appear related to the context of that section. Please describe what change was made and where that language is located within the PSP. Additionally, please confirm that appropriate changes will be made during the next revision of the site's PSP to ensure the language is consistent and cites the correct references.

2. Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(e)(1)(ii), the licensee shall describe in the PSP, physical barriers, barrier systems, and their functions within the physical protection program.

Consistent with 10 CFR 73.55(e)(10)(i)(A), the licensee shall design, construct, install, and maintain a vehicle barrier system, to include passive and active barriers, at a stand-off distance adequate to protect personnel, equipment, and systems necessary to prevent significant core damage and spent fuel sabotage against the effects of the design basis threat of radiological sabotage and vehicle bomb assault.

Sections 1.1, 11.1, and Figure 3 of the PSP and Section 7.0 of the SCP (Appendix C) indicate a specific change in Owner Controlled Area vehicle barrier configuration, the reason for which is not clearly explained in the deviation/revision table to the plans:

Enclosure

- a. Please describe the rationale for this change.
 - b. Please describe the analysis conducted that led to this change in configuration and how the new configuration continues to meet the requirement of 10 CFR 73.55 (e)(10)(i)(A).
 - c. Please describe any control measures that have been implemented to provide an equivalent level of protection to the previous configuration.
 - d. Please confirm that appropriate changes will be made during the next revision of the site's plans to ensure the language clearly explains this Owner Controlled Area vehicle barrier configuration change.
3. Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.56(j), the licensee shall establish, implement, and maintain a list of individuals who are authorized to have unescorted access to specific nuclear power plant vital areas during non-emergency conditions. The list must include only those individuals who have a continued need for access to those specific vital areas in order to perform their duties and responsibilities. The list must be approved by a cognizant licensee or applicant manager or supervisor who is responsible for directing the work activities of the individual who is granted unescorted access to each vital area, and updated and re-approved no less frequently than every 31 days.

In the deviation/revision table of the security plans, there is no explanation provided for the ninth deviation/revision listed in the table for Section 22.3.5 of the PSP, to explain why the deviation/revision is being made to the PSP. Please describe why the change was made and why the entities listed can now act as reviewing officials.

4. Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Section 15.2 of the PSP does not discuss an approved exemption to the compliance date specified in 10 CFR 73.55(a)(1) for a particular requirement, until November 5, 2013. However, the second paragraph of Section 15.4 appears to indicate compliance with that particular requirement. The aforementioned exemption was last noted in Section 15.2 of Revision 18 of the PSP. Based on the language in Sections 15.2 and 15.4 of Revision 20 of the PSP, it is unclear if compliance with that particular requirement has been achieved or not. Please clarify if compliance with that particular requirement has been achieved or not, and if so, in what manner. Additionally, please confirm that appropriate changes will be made during the next revision of the site's PSP to ensure the language clearly indicates whether or not compliance has been achieved for the particular requirement from which the licensee has been granted an exemption to the compliance date specified in 10 CFR 73.55(a)(1), until November 5, 2013.