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10 CFR 73.4

October 4, 2013

ZS-2013-0326

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

Zion Nuclear Power Station (ZNPS), Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295, 50-304 and 72-1037

Subject: Revision to Previously Submitted License Amendment and Exemption Request for Independent Spent Fuel Storage Installation Physical Security Plan

Reference 1) requested an amendment to the ZNPS licenses to approve: a) a revision to the Zion Nuclear Power Station (ZNPS) Physical Security Plan (PSP) including a Transfer Plan; b) a new stand-alone ZNPS Independent Spent Fuel Storage Installation (ISFSI) Physical Security Plan; and; c) a revision to License Condition 2.C (6) of licenses DPR-39 and DPR-48 to incorporate the ISFSI PSP. Reference 1 also identified the existing NRC approved exemptions to various provisions of 10 CFR 73.55 that would be applied to the ISFSI PSP (and several that would not).

One June 5, 2013, ZionSolutions, LLC (ZS) submitted Reference 2) to supplement the ZNPS ISFSI PSP and associated exemption requests provided in Reference 1). This submittal supplements the request previously proposed by Reference 1) and supersedes the version of the ZNPS Independent Spent Fuel Storage Installation (ISFSI) Physical Security Plan previously submitted therewith. To clarify certain sections of the ZNPS ISFSI PSP, implementing procedures have been provided with this submittal. No changes are made to the previously submitted revision to the previously NRC approved Defueled Physical Security Plan or its attached Fuel Transfer Plan, to the previously proposed revisions to License Condition 2.C (6) or requested exemptions.

The proposed amendment including the revision herein reflects the intent of ZS to transfer all spent nuclear fuel from wet storage that is in the spent fuel pool to dry storage casks located at an on-site ISFSI. Greater than Class C (GTCC) low level radioactive waste will also be transferred to the ISFSI from the Containment Buildings.

The new ZNPS ISFSI Physical Security Plan, Revision 2 is provided in Enclosure 2. The ZNPS ISFSI Physical Security Plan meets the additional security measures for physical protection and access authorization requirements for ISFSIs as provided to ZS in NRC Order EA-11-268 issued on November 10, 2011 (Reference 3). The commitments to the additional security measures and

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on November 10, 2011 (Reference 3). The commitments to the additional security measures and access authorization requirements are included in the plan and a response to the order was provided on January 9, 2012 (Reference 4).

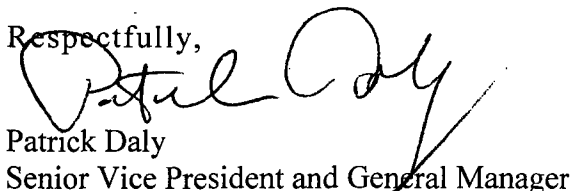
In accordance with 10 CFR 50.91, ZS is notifying the State of Illinois of this license amendment request by transmitting a copy of this letter to the designated State Official.

Approval of the proposed amendment and exemptions is requested within a reasonable time period to support ZionSolutions' expected fuel transfer readiness date of October 31, 2013. Once approved, the amendment and exemptions will be implemented prior to the start of spent fuel transfer operations.

Enclosure 1, 2 and 3 to this cover letter contains Safeguards Information (SGI) of a type specified in 10 CFR 73.22(a)(1) and 10 CFR 73.22(a)(4) is being withheld from public disclosure. In accordance with 10 CFR 2.390, a copy of Enclosure 4 and 5 contain Official Use Only – Security Related Information (OUO-SRI), when detached from Enclosure 1, 2 and 3, do not contain Safeguards Information.

If you have any questions regarding this submittal, please contact Mr. Patrick Thurman of my staff at (224) 789-4041.

Respectfully,



Patrick Daly
Senior Vice President and General Manager
ZionSolutions, LLC

References:

- 1) Patrick Thurman, ZionSolutions, LLC, Letter to John Hickman, U.S. Nuclear Regulatory Commission, "License Amendment and Exemption Request for Independent Fuel Storage Installation Physical Security Plan," dated June 18, 2012.
- 2) Patrick Daly, ZionSolutions, LLC, Letter to John Hickman, U.S. Nuclear Regulatory Commission, "Revision to Previously Submitted License Amendment and Exemption Request for Independent Spent Fuel Storage Installation Physical Security Plan," dated June 5, 2013.
- 3) John B. Hickman, U.S. Nuclear Regulatory Commission, Letter to John A. Christian, ZionSolutions, LLC, "Zion Nuclear Power Station, Units 1 and 2 - Issuance of Exemption From Security Requirements of 10 CFR Part 50 and 10 CFR Part 73," dated November 10, 2011.

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- 4) Patrick S. Thurman, ZionSolutions, LLC, Letter to Director, Division of Spent Fuel Storage and Transportation, U.S. Nuclear Regulatory Commission, "Response to NRC Order EA-11-268, Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Zion Nuclear Power Station Independent Spent Fuel Storage Installation," dated January 9, 2012.

Attachment:

Affidavits

Enclosures:

- (1) Summary of Changes to the ZNPS ISFSI Physical Security Plan (SGI)
- (2) ZNPS ISFSI Physical Security Plan (SGI)
- (3) Zion Station Procedures: (SGI)
 - ZS-IS-905, CAS Responsibilities (SGI)
- (4) Zion Station Procedures: (OUO-SRI)
 - ZS-IS-904, NRC Threat Advisory and Protective Measures System (OUO-SRI)
 - ZS-IS-909, ISFSI Personnel Access Control (OUO-SRI)
 - ZS-IS-910, ISFSI Vehicle Control (OUO-SRI)
- (5) Lesson Plans (OUO-SRI)
 - Patrol Officer 1.13 (OUO-SRI)
 - Patrol Officer 1.8 (OUO-SRI)

cc: John Hickman, U.S. NRC Senior Project Manager (with Enclosures)
Doug Gardner, U.S. NRC Office of Nuclear Security and Incident Response (with Enclosures)
Service List (w/o Enclosures)

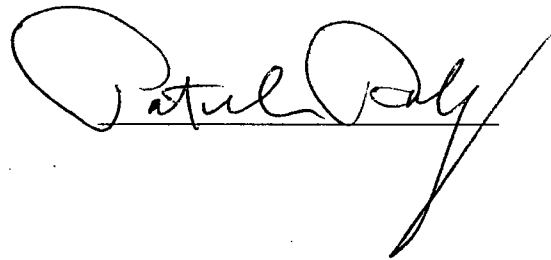
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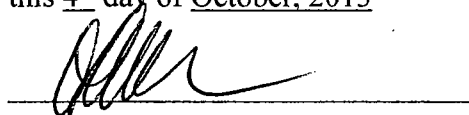
STATE OF ILLINOIS)
) SS
COUNTY OF LAKE)

Patrick T. Daly, being duly sworn according to law deposes and says:

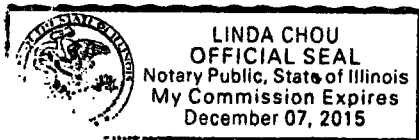
I am Senior Vice President and General Manager of ZionSolutions, LLC, and as such, I am familiar with the contents of this correspondence and the enclosures thereto, concerning the Zion Nuclear Power Station, Units 1 and 2, and the matters set forth therein are true and correct to the best of my knowledge, information, and belief.



Subscribed and Sworn to before me
this 4th day of October, 2013



Notary Public of Illinois



Zion Nuclear Power Station, Unit 1 and 2 License Transfer Service List

cc:

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