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**LEVY NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 52-029 AND 52-030
RESPONSE TO NRC RAI LETTER 115 – RELATED TO SRP SECTION 1.5 FOR LEVY
NUCLEAR PLANT, UNITS 1 AND 2 COMBINED LICENSE APPLICATION**

References: Letter from Donald Habib (NRC) to Christopher M. Fallon (DEF), dated January 2, 2014, "Request for Additional Information Letter No. 115 Related to SRP Section 1.5 for the Levy Nuclear Plant, Units 1 and 2 Combined License Application."

Ladies and Gentlemen:

Duke Energy Florida, Inc. (DEF) hereby submits a response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) cited in the References section. The enclosure to this letter contains DEF's response. The enclosure also identifies changes to be included in a future revision of the Levy Nuclear Plant (LNP) Units 1 and 2 COL application. These changes identify actions that are specific to the LNP project and do not represent actions that are applicable to other AP1000 COL applicants or licensees.

If you have any further questions, or need additional information, please contact Bob Kitchen at (704) 382-4046, or me at (704) 382-9248.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 11, 2014

Sincerely,

Christopher M. Fallon
Vice President
Nuclear Development

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NRD

Enclosure:

Levy Nuclear Plant Units 1 and 2 (LNP) Response to NRC Request for Additional Information Letter No. 115 Related to SRP Section 1.5 for the Levy Nuclear Plant, Units 1 and 2 Combined License Application.

cc: U.S. NRC Region II, Regional Administrator
Mr. Donald Habib, U.S. NRC Project Manager

**Levy Nuclear Plant Units 1 and 2 (LNP)
Response to NRC Request for Additional Information Letter No. 115
Related to SRP Section 1.5, for the Levy Nuclear Plant, Units 1 and 2
Combined License Application, Dated 01/02/14**

<u>NRC RAI #</u>	<u>Duke Energy RAI #</u>	<u>Duke Energy Response</u>
01.05-2	L- 1080	Response enclosed –See the following pages

NRC Letter No.: LNP-RAI-LTR-115

NRC Letter Date: January 2, 2014

NRC Review of Final Safety Analysis Report

Text of NRC RAI:

QUESTIONS

01.05-2

Introduction:

On March 19, 2013, 10 CFR Part 37 rule was published in the Federal Register. The U.S. Nuclear Regulatory Commission (NRC) amended its regulations to establish security requirements for the use and transport of category 1 and category 2 quantities of radioactive material. The NRC considers these quantities to be risk significant and, therefore, to warrant additional protection. Category 1 and category 2 thresholds are based on the quantities established by the International Atomic Energy Agency (IAEA) in its Code of Conduct on the Safety and Security of Radioactive Sources, which the NRC endorses. The objective of the 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," rule is to provide reasonable assurance of preventing the theft or diversion of category 1 and category 2 quantities of radioactive material. The regulations also include security requirements for the transportation of irradiated reactor fuel that weighs 100 grams or less in net weight of irradiated fuel. The 10 CFR Part 37 rule affects any licensee that possesses an aggregated category 1 or category 2 quantity of radioactive material, any licensee that transports these materials using ground transportation, and any licensee that transports small quantities of irradiated reactor fuel. The 10 CFR Part 37 rule compliance date is March 19, 2014.

Regulatory Basis:

- 1) Subpart C of Title 10 CFR Part 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) applications include how the applicant will meet the requirements of 10 CFR Part 73. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."
- 2) 10 CFR 37.3 Scope (a) Subparts B and C of this part apply to any person who, under the regulations in this chapter, possesses or uses at any site, an aggregated category 1 or category 2 quantity of radioactive material. (b) Subpart D of this part applies to any person who, under 10 CFR Part 37: (1) Transports or delivers to a carrier for transport in a single shipment, a category 1 or category 2 quantity of radioactive material; or (2) Imports or exports a category 1 or category 2 quantity of radioactive material; the provisions only apply to the domestic portion of the transport.
- 3) 10 CFR Part 37, Subpart C, "Physical Protection Requirements During Use" Section 10 CFR 37.41 contains the following requirements: (a)(1) each licensee that possesses an aggregated category 1 or category 2 quantity of radioactive material shall establish,

implement, and maintain a security program; (a)(2) an applicant for a new license and each licensee that would become newly subject to the requirements of this subpart upon application for modification of its license shall implement the requirements of this subpart, as appropriate, before taking possession of an aggregated category 1 or category 2 quantity of radioactive material; (a)(3) any licensee that has not previously implemented the Security Orders or been subject to the provisions of subpart C shall provide written notification to the NRC regional office specified in § 30.6 of this chapter at least 90 days before aggregating radioactive material to a quantity that equals or exceeds the category 2 threshold; (b) General Performance Objective. Each licensee shall establish, implement, and maintain a security program that is designed to monitor and, without delay, detect, assess, and respond to an actual or attempted unauthorized access to category 1 or category 2 quantities of radioactive material; (c) Program features. Each licensee's security program must include the program features, as appropriate, described in §§ 37.43, 37.45, 37.47, 37.49, 37.51, 37.53, and 37.55.

NRC has provided guidance for material licensees on how to comply with 10 CFR Part 37 in the form of NUREG-2155, *Implementation guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."*

The Levy COL application, Part 8, Security Plan, Revision 4, dated June 3, 2011, describes how the applicant will establish and maintain a physical protection program that satisfies the general performance objective and requirements in 10 CFR 73.55(b). As required, this program will include a security organization, which will have as its objective to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety. As discussed above, 10 CFR Part 37, Subpart C requires a security program for the protection of aggregated quantities of category 1 or category 2 radioactive materials. Section 37.11(b) provides a specific exemption which states that any licensee's NRC-Licensed activities are exempt from the requirements of subpart B and C of Part 37 to the extent that its activities are included in a security plan required by Part 73. Since Levy will be licensed to possess aggregated quantities of Category 2 or greater radioactive material, it will be required to establish and maintain a security plan which meets the requirements of Part 37. This may be done either by modifying the Part 73 security plans or by developing a Part 37 security plan. In either case, the applicant may take credit for security measures already provided under the Part 73 plan. However, the Levy COL application does not describe how the requirements of 10 CFR Part 37 will be met. In addition, the applicant's Security Plan, Revision 4, which consists of the Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, does not describe how the requirements of 10 CFR Part 37 will be met.

- 1) The applicant should provide descriptions in the COL application (e.g. FSAR Chapter 13) to address how the applicant, prior to taking possession of an aggregated category 1 or category 2 quantity of radioactive material, will implement the requirements of 10 CFR Part 37, by establishing, implementing, and maintaining a security program for the Levy Units 1 and 2.
- 2) The applicant should describe what procedures are in place (or to be developed) to evaluate the aggregated category 1 or category 2 quantities of radioactive materials, prior to the applicants receiving Part 30 byproduct material sources on site, against the pertinent quantities described in 10 CFR Part 37. The applicant should describe who will be responsible for evaluating these aggregated sources and should verify that this

evaluation of aggregated sources includes both licensee owned and contractor owned sources if appropriate (e.g., if those sources may be stored in the same local location).

Duke RAI ID #: L-1080

DEF Response to NRC RAI:

DEF will implement a 10 CFR Part 37 Physical Protection Program prior to initial receipt or shipment of category 1 or category 2 quantities of radioactive material. Specific changes to the Levy COLA are described below.

- Levy Table 13.4-201, "Operational Programs Required by NRC Regulations" will be revised to add the 10 CFR Part 37 Physical Protection Program with an implementation milestone date of prior to possession of aggregated category 1 or category 2 quantities of radioactive material. Also, Table 13.4-201 will be revised to add "10 CFR 37" to the "Program Source (Required by)" column of Item 10 for the Radiation Protection Program.
- Levy FSAR Subsection 13.5.2.2.8, "Security Procedures," will be revised to add a sentence addressing the Part 37 Physical Protection Program description.
- A new Subsection 13.5.2.2.10, "10 CFR 37 Physical Protection Program Procedures" will be added to describe the program procedures.
- Subsection 13.6.2, "Security" will be revised to add text relating to the 10 CFR Part 37 Physical Protection Program.
- Part 10, Proposed License Condition C, "Receipt of Materials" will be revised to add requirements for implementation of the 10 CFR Part 37 Physical Protection Program.
- Subsection 11.4.6.3.1, "Outside Storage Pad Design Considerations" will be revised to address the 10 CFR Part 37 Physical Protection Program Issues as they relate to the on-site Low Level Radioactive Waste (LLRW) storage facility.
- A 10 CFR Part 37 Physical Protection Program Description will be added to the Levy COLA part 11 as a new Enclosure 11G. The program description includes a discussion of the scope of the program, definitions, organizational responsibilities (including the responsibilities relating to the evaluation of aggregated sources), and programmatic controls. The Part 11, "Table of Contents/Revision Summary" will be updated to reflect the new Enclosure 11G.

On January 14, 2014 a public call was held to discuss the plans for incorporating Part 37 issues into the LNP COLA and the proposed RAI response. During the meeting DEF described the changes that were being considered to Section 13 of the FSAR: Chapters 13.1, 13.2, 13.4, 13.5, 13.6, and Table 13.4-201. After developing the Part 37 Physical Protection Program Description, it was determined that the Section 13.1 and 13.2 changes were not required. FSAR Section 13.1, "Organizational Structure of Applicant", will not be revised since Section 3 of the Part 37 Physical Protection Program Description addresses organizational issues. In addition, the program description Section 4. "Programmatic Controls", Subsection 4.1, Item 5. addresses FSAR Section 13.2, "Training" issues.

Associated LNP COL Application Revisions:

The revisions identified below will be made in a future revision of the Levy Nuclear Plant Units 1 and 2 application.

Revise COLA Part 2, Table 13.4-201, (Sheet 4 of 11), to include "prior to receipt of category 1 or category 2 radioactive material" to Milestone 1. of Item #10.

Operational Programs Required by NRC Regulations

Item	Program Title	Program Source	FSAR	Implementation	
		(Required by)	Section	Milestone	Requirement
10.	Radiation Protection Program (including ALARA principle)	10 CFR 20.1101 10 CFR 20.1406 <u>10 CFR 37</u>	12.1 12.5	1. Prior to initial receipt of by-product, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18)	License Condition

Revise COLA Part 2, Table 13.4-201, (Sheet 11 of 11), to add a new item #23:

Operational Programs Required by NRC Regulations

Item	Program Title	Program Source	FSAR	Implementation	
		(Required by)	Section	Milestone	Requirement
<u>23.</u>	<u>10 CFR Part 37 Physical Protection Program</u>	<u>10 CFR 37 Subparts A, B, C, D, F</u>	<u>13.5.2.2.8, 13.5.2.2.10, 13.6, 11.4</u>	<u>Prior to possession of aggregated category 1 or category 2 quantities of radioactive material</u>	<u>10 CFR 37</u>

a) Inservice Testing Program will be fully implemented by generator on line on nuclear heat. Appropriate portions of the program are implemented as necessary to support the system operability requirements of the technical specifications.

Revise COLA Part 2, Subsection 13.5.2.2.8 as follows:

13.5.2.2.8 Security Procedures

A discussion of security procedures is provided in the Security Plan. The Special Nuclear Material (SNM) Physical Protection Program describes the 10 CFR Part 70 required protection program in effect for the period of time during which new fuel as SNM is received and stored in a controlled access area (CAA), in accordance with the requirements of 10 CFR 73.67.

The New Fuel Shipping Plan addresses the applicable 10 CFR 73.67 requirements in the event that unirradiated new fuel assemblies or components are returned to the supplying fuel manufacturer(s) facility.

The 10 CFR Part 37 Physical Protection Program description addresses the applicable 10 CFR 37 requirements to provide physical protection for category 1 or category 2 quantities of radioactive material.

Revise COLA Part 2, Subsection 13.5.2.2 by adding a new subsection 13.5.2.2.10:

13.5.2.2.10 10 CFR 37 Physical Protection Program Procedures

A 10 CFR 37 Physical Protection Program consisting of procedures is utilized to delineate the requirements, responsibilities, and methods associated with the physical protection of category 1 and category 2 quantities of radioactive material. These procedures provide the detailed steps for receipt, use, storage, transport and preparing records and reports.

Revise COLA Part 2, Subsection 13.6 as follows:

13.6 SECURITY

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

The Security Plan consists of the Physical Security Plan, the Training and Qualification Plan, and the Safeguards Contingency Plan. The Security Plan is submitted to the Nuclear Regulatory Commission as a separate licensing document in order to fulfill the requirements of 10 CFR 52.79(a)(35) and 52.79(a)(36) and is incorporated by reference (see Table 1.6-201). The Security Plan meets the requirements contained in 10 CFR Part 73 and will be maintained in accordance with the requirements of 10 CFR 52.98. The Plan is categorized as Security Safeguards Information and is withheld from public disclosure pursuant to 10 CFR 73.21.

A 10 CFR 37 Physical Protection Program is established, implemented and maintained in order to protect category 1 or category 2 quantities of radioactive material from theft or diversion per 10 CFR Part 37 requirements. The 10 CFR 37 Physical Protection Program is submitted to the Nuclear Regulatory Commission as a separate licensing basis document.

The Cyber Security Plan is submitted to the Nuclear Regulatory Commission as a separate licensing document to fulfill the requirements contained in 10 CFR 52.79(a)(36) and 10 CFR 73.54 and is incorporated by reference (see Table 1.6-201). The Cyber Security Plan will be maintained in accordance with the requirements of 10 CFR 52.98. The Plan is withheld from public disclosure pursuant to 10 CFR 2.390.

Table 13.4-201 provides milestones for the security program, the 10 CFR 37 physical protection program, and the cyber security program implementation.

Revise COLA Part 10, Section 3, "Operational Program Implementation", "Proposed License Condition", Item "C" as follows:

- C. Receipt of Materials – The licensee shall implement each operational program identified below prior to initial receipt of byproduct, source, or special nuclear materials on-site; or with respect to the 10 CFR Part 37 Physical Protection Program, prior to the possession of aggregated quantities of category 1 or 2 radioactive materials on-site (excluding Exempt Quantities as described in 10 CFR 30.18)
- C.1 – Radiation Protection (applicable portions)
 - C.2 – Fire Protection Program (applicable portions)
 - C.3 – Non Licensed Plant Staff Training Program (applicable portions)
 - C.4 – Deleted
 - C.5 – Deleted
 - C.6 – Deleted
 - C.7 – SNM Material Control and Accounting Program
 - C.8 – 10 CFR Part 37 Physical Protection Program

Revise COLA Part 2, Subsection 11.4.6.3.1 as follows:

11.4.6.3.1 Outside Storage Pad Design Considerations

The following design considerations would be applied to the on-site LLRW storage facility: (References 202, 203, and 204):

- The location of the storage pad would meet the dose rate criteria of 40 CFR 190 and 10 CFR 20.1302 for both the site boundary and unrestricted area. The onsite storage will be located such that any additional dose contributes less than 1 mrem per year to the 40 CFR Part 190 limits. Onsite dose limits will be controlled per 10 CFR 20, including the ALARA principle of 10 CFR 20.1101.
- The outside storage pad would be an engineered feature designed to minimize settling and would be constructed of reinforced concrete or engineered gravel.
- The storage pad location would avoid natural or engineered surface drainage and be located at an elevation considering the site's design bases flood level.
- The storage pad would have a fence or other suitable security measures

consistent with its location on the site.

- If the storage pad is used to store category 1 or category 2 quantities of radioactive material (radioactive waste), then the 10 CFR Part 37 Physical Protection Program would be applied.
- The waste containers (typically high integrity containers) would be stored inside of a shielded container, typically consisting of reinforced concrete containers that provide radiation shielding and weather protection.
- The configuration of the storage shields would be arranged to be accessible from the perimeter road or from a center aisle using a mobile crane (if used).
- Personnel passages would be provided between rows of storage shields for access to the container for inspection.
- Adequate electrical power and lighting would be provided at the storage facility to allow power for tools, analytical equipment, sample pumps, radiation instruments, boroscope lights, etc.
- Fire protection, fire hydrants or fire extinguishers for vehicle fires should be provided.

Revise Part 11, "Enclosures", by adding new Enclosure 11G as follows:

10 CFR Part 37 Physical Protection Program Description

1. Scope

On March 19, 2013, NRC issued 10 CFR Part 37 for the security requirements for the use and transport of category 1 and category 2 quantities of radioactive material. Category 1 and category 2 quantities are defined in 10 CFR 37, Appendix A. Nuclear power plants are required to be in full compliance with this rule by March 19, 2014.

According to NRC, the following statements apply to Part 37:

1. Generally, category 1 and category 2 quantities of radioactive material, including radioactive waste (radwaste), located inside the defined Protected Area (PA) of a nuclear power plant are normally protected per a 10 CFR Part 73 security plan. The existing physical security measures required by Part 73 for the PA provide protection equivalent to or greater than Part 37 requirements. Any use of Part 73 to satisfy the requirements of Part 37 should be thoroughly documented in the Part 73 security plan to include protection of greater than or equal to a category 2 quantity of radioactive material, or a separate Part 37 security plan.
2. All category 1 and category 2 quantities of radioactive material and radwaste located outside the defined Protected Area of a nuclear power plant, but within some type of defined Controlled Area (e.g., Owner Controlled Area(OCA)), may or may not be protected under a Part 73 required security plan. Site specific evaluation of the Part

37 requirements and the security provided in this area as defined within the Part 73 security plan will need to be completed. Either a modified Part 73 security plan or a Part 37 security plan will be required to document the protection within this area.

3. All radioactive material/radwaste shall be assessed for applicability to Part 37 (discrete sources and aggregated material with total activity that equals or exceeds a category 2 quantity) if stored outside the defined PA (i.e., OCA).
4. A licensee transferring a category 1 or category 2 quantity of radioactive material to an NRC-licensed facility or an Agreement State shall meet the requirements of 10 CFR Part 37, Subpart D "Physical Protection In Transit." The license verification provisions of Part 37.71(a-d) shall be used instead of those listed in 10 CFR 30.31(d).
5. Part 37 does not apply to spent (used) fuel.

Note: Irradiated reactor fuel 100 grams or less in transit shall follow the physical requirements for category 1 quantities of radioactive material in Subpart D of 10 CFR Part 37. [10 CFR 73.35]

This program description establishes guidelines concerning the protection from theft or diversion of category 1 and category 2 quantities of radioactive material at the Duke Energy Florida, Inc. (DEF) Levy Nuclear Plant (LNP) Units 1 and 2. Category 1 and 2 quantities of radioactive material stored inside the PA are covered by requirements as delineated in the Levy Physical Security Plan (PSP) per Part 73.

In addition to the information provided in this program description, the following LNP Units 1 and 2 licensing basis documents provide the regulatory basis that describes how the applicable requirements of 10 CFR 37 will be met:

- Information related to Part 37 requirements for physical protection of greater than or equal to a category 2 quantity of radioactive material stored outside the PA is provided in FSAR Section 11.4.
- Information related to the organizational structure of the applicant, including those responsible for 10 CFR 37 physical protection of category 1 or category 2 quantities of radioactive material from theft or diversion, is provided in FSAR Section 13.1.
- Information related to training of personnel, including those responsible for 10 CFR 37 physical protection of category 1 or category 2 quantities of radioactive material, is provided in FSAR Section 13.2.
- Information related to implementation of this 10 CFR 37 Physical Protection Program is provided in FSAR Table 13.4-201.

- Information related to plant procedures, including those used for the physical protection of 10 CFR 37 quantities of radioactive material, is provided in FSAR Section 13.5.
- Information related to the establishment of a 10 CFR 37 Physical Protection Program is provided in FSAR Section 13.6.

2. Definitions

In this program description, the following definitions shall apply:

- 2.1. Aggregated quantity:** accessible by the breach of a single physical barrier that would allow access to radioactive material in any form, including any devices that contain the radioactive material, when the total activity equals or exceeds a Category 2 quantity of radioactive material.
- 2.2. Category 1 quantity of radioactive material:** quantity of radioactive material meeting or exceeding the category 1 threshold provided in Appendix A of 10 CFR 37.
- 2.3. Category 2 quantity of radioactive material:** quantity of radioactive material meeting or exceeding the category 2 threshold, but less than the category 1 threshold, provided in Appendix A of 10 CFR 37.
- 2.4. Owner Controlled Area:** the area for which the reactor licensee or licensee applicant owns and is responsible for, including the PA.
- 2.5. Physical Protection:** measures taken to protect radioactive material against theft or diversion.
- 2.6. Protected Area:** The area within the Owner Controlled Area encompassed by physical barriers and to which access is controlled subject to 10 CFR 73 requirements.
- 2.7. 10 CFR Part 37 Physical Protection Program:** the programmatic controls implemented to protect category 1 and category 2 quantities of radioactive material from theft or diversion.

3. Organizational Requirements

3.1. Delegation of Responsibilities and Authority

Functional and organizational relationships are set forth in writing in organizational directives, instructions, procedures, manuals, and other documents. Documentation includes position qualification requirements and definitions of authority, responsibilities, and duties. Specific assignments of responsibilities are prescribed for all facets of the 10 CFR 37 program physical protection functions in accordance with steps 3.1.1 through 3.1.7.

Titles assigned to the positions are intended to be descriptive only. Organizations, specific titles, and related functions may vary. Positions may be filled by personnel in existing plant organizations, or may be created as necessary.

3.1.1. Site Executive for Plant Management

The site executive for plant management has the responsibility for overall physical protection of category 1 and category 2 quantities of radioactive material from theft or diversion as required by 10 CFR 37 at the plant site.

3.1.2 Plant Manager

The plant manager has overall responsibility for implementation of the 10 CFR 37 Physical Protection Program.

3.1.3 Access Authorization

The access authorization group will provide support for ensuring that personnel with access to category 1 or category 2 quantities of radioactive material have undergone the required screening and background checks necessary to meet 10 CFR Part 37 requirements.

3.1.4 Radiation Protection

The radiation protection group supports the implementation of the 10 CFR 37 Physical Protection Program by developing requirements for category 1 or category 2 quantities of radioactive material during: 1) storage and aggregation, 2) use, and 3) receipt and shipment. Radiation Protection provides oversight controls for vendors/contractors conducting activities involving 10 CFR 37 category 1 or category 2 quantities of radioactive material during construction and operation phases.

3.1.5 Security

The security group will provide physical protection support as required, for 10 CFR Part 37 category 1 or category 2 quantities of radioactive material during storage, use and transit as applicable, to meet 10 CFR Part 37 requirements. Security group duties include alarm response, reporting requirements, and notification of Local Law Enforcement Agencies (LLEA), as required.

3.1.6 Executive in Charge of Site Construction

During construction and after the possession of aggregated category 1 or 2 quantities of radioactive material, the executive in charge of site construction has overall responsibility for physical protection of category 1 and category 2 quantities of radioactive material from theft or diversion as required by 10 CFR 37. This responsibility will be transferred to the site executive for plant management when the unit transitions from the construction phase to the operational phase.

4. Programmatic Controls

4.1. Procedures

Written procedures are prepared and maintained covering the physical protection from theft or diversion of category 1 or category 2 quantities of radioactive material as required in 10 CFR 37. These procedures shall address, as a minimum, the following topics:

1. Identification and documentation of the location of all radioactive material and radwaste with a potential for the total activity to be equal to or greater than category 2 threshold limits.
2. Determination of items or materials that could constitute aggregated material.
3. Calculation of the total activity of category 1 or category 2 radioactive materials using NRC-approved methodologies.
4. Access authorization requirements for personnel having access to category 1 or category 2 quantities of radioactive material.
5. Training requirements for personnel implementing 10 CFR 37 physical protection functions, which are to include training on applicable radiation protection, access authorization, and security procedures.
6. Oversight controls for vendors/contractors conducting activities involving category 1 or category 2 quantities of radioactive material.
7. Physical protection requirements for the storage, use, receipt or transit of category 1 or category 2 quantities of radioactive material, as applicable, to meet 10 CFR Part 37 requirements.

4.2. Configuration Control

Provisions are made for written approval of revisions to the contents of the 10 CFR 37 Physical Protection Program procedures by the appropriate plant personnel, such as the plant general manager.

4.3. Corrective Action Program

Discrepancies or program deficiencies are documented, investigated, reported, and resolved using the plant corrective action program.

4.4 Records and Reports

Records regarding category 1 and category 2 quantities of radioactive materials are created, protected and retained as required in 10 CFR Part 37. Reporting of events will be performed in accordance with 10 CFR Part 37 requirements.

4.5 System Review and Assessment

Reviews of the 10 CFR Part 37 Physical Protection Program are conducted periodically (at least annually). The results of the reviews are document and reported in accordance with DEF's quality assurance and/or self-assessment programs.

Attachments/Enclosures:

None.