

10CFR50.54p LG-14-025

February 12, 2014

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

Limerick Generating Station, Units 1 and 2

Facility Operating License Nos. DPR-39 and DPR-85

NRC Docket Nos. 50-352 and 50-353

Subject:

Limerick Generating Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation

Security Program Revision 10

In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (p)(2), Exelon Generation Company, LLC (EGC) is submitting Revision 10 to the Limerick Generating Station (LGS) Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program (Security Plan). The changes to the LGS Security Plan were implemented on January 31, 2014. In accordance with 10 CFR 50.54(p)(2), EGC is submitting this change within 60 days of implementation (i.e., no later than April 1, 2014).

The LGS Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program have been revised to:

- 1. In section 11.3 of the Physical Security Plan (PSP), the licensee describes areas where there is no isolation zone in accordance with 10 CFR 73.55 (e)(8)(iv). The basis for areas with no isolation zones was documented in this revision.
- 2. In section 15.1 of the PSP, the licensee describes illumination at Limerick Generating Station. The revision 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(e)(7)(i)(c) and 10 CFR 73.55 (i)(2).
- In section 15.5.1 of the PSP, the licensee describes owner controlled area (OCA) surveillance methods. The revision describes the equipment and/or personnel used for OCA surveillance in accordance with 10 CFR 73.55(c)(3).
- 4. In section 4.1.2 of the Safeguards Contingency Plan (SCP), the licensee describes the security chain of command and delegation of authority. The revision describes the security chain of command and delegation of authority in accordance with 10 CFR 73.55(c)(5).

#### SAFEGUARDS INFORMATION

ATTACHMENTS 1 & 2 CONTAIN SAFEGUARDS INFORMATION
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- 5. In reference to section 5.4 of the SCP, the licensee describes facility operations personnel response. The revision 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 the OCA vehicle checkpoint. The revision describes the OCA vehicle checkpoint and how it meets the requirements of 10 CFR 73.55(h)(2)(iii) and 10 CFR 73.55 (h)(2)(v).
- 7. In section 11.1 of the PSP, the licensee describes the Early Warning System (EWS). Revision 10 describes the following: access through the EWS barrier at Limerick Generating Station, access control portals of the EWS, locking devices/intrusion detection/surveillance equipment of the EWS, unattended openings that intersect the EWS, illumination of the EWS, program reviews of the EWS, intervals that EWS security equipment is tested, and compensatory measures for the EWS.

EGC has concluded that the changes do not decrease the safeguards effectiveness of the LGS Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program.

Attachment 1 and 2 contain Safeguards Information. Therefore, EGC requests that this information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," paragraph (a)(1)(i), and 10 CFR 73.21, "Requirements for the protection of safeguards information," paragraph (b)(1)(i).

If you have any questions or require additional information, please contact Craig Gulotta at 610-718-2044.

Sincerely,

Thomas J. Dougherty Vice President, LGS

Exelon Generation Co. LLC

CC:

- Attachments: 1. Limerick Generating Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program, Revision 10 including Figures 1, 2, and 3 (Contains Safeguards Information)
  - 2. SY-AA-101-104-F-03, Table of Changes for Site Security Plan Change Submittals (Contains Safeguards Information)

Regional Administrator - NRC Region I w/attachments

SAFEGUARDS INFORMATION

## **ATTACHMENT 1**

Limerick Generating Station, Units 1 and 2
Docket No. 50-352 and 50-353

Limerick Generating Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program, Revision 10 (Includes Figures 1, 2, and 3)

**SAFEGUARDS INFORMATION** 

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# **ATTACHMENT 2**

Limerick Generating Station, Units 1 and 2 Docket No. 50-352 and 50-353

SY-AA-101-104-F-03, Table of Changes for Site Security Plan Change Submittals

**SAFEGUARDS INFORMATION** 

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