

NSIR REVIEW - TAC D92704

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

EXELON GENERATION CO. LLC

OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NOS. 50-219

LICENSE NO. DPR-16

1.0 INTRODUCTION

By letter dated June 30, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15190A354) Exelon, Docket No. 50-219, Renewed Facility Operating License No. DPR-16, submitted the Oyster Creek Nuclear Generating Station Physical Security Plan (PSP), which also included Training and Qualification Plan, (T&QP) and Safeguards Contingency Plan (SCP), Revision 13, to the Nuclear Regulatory Commission (NRC) under the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50 "Domestic Licensing of Production and Utilization Facilities," Section 50.54 "Conditions of License" paragraph (p)(2). The enclosure to the application contains Safeguards Information, which is protected under 10 CFR 73.21 and is withheld from public access pursuant to the requirements of 10 CFR 9.17 (NS113213).

The June 30, 2015 submittal implements an approved alternative measure as indicated in the NRC letter dated March 30, 2015, Oyster Creek Nuclear Generating Station (OCNGS) with regard to controlling vital area access to certain portions of the reactor building that satisfied applicable requirements of 10 CFR 73.55 (Accession No. ML14329A625).

The staff review of the licensee's PSP was conducted consistent with the applicable requirements of 10 CFR Part 73 as well as the guidance contained within the Office of Nuclear Security and Incident Response (NSIR) Procedure LIC 800 "Security Review Procedure for 10 CFR 50.54(p)(2)" and the U.S. Nuclear Regulatory Commission (NRC)-endorsed Nuclear Energy Institute (NEI) 03-12, Revision 7, template for Security Plans as appropriate.

2.0 REGULATORY EVALUATION

Pursuant to 10 CFR 50.54(p)(2): "the licensee may make changes to the plans without prior Commission approval if the changes do not decrease the safeguards effectiveness of the security plans. The licensee must submit a report to the NRC containing the description of each change, within two months after changes are made."

The NRC staff review consisted of determining whether the licensee appropriately implemented NRC-approved alternative measure that meets the same performance

objectives specified in 10 CFR 73.55(b) and the implementation of these changes under 10 CFR 50.54(p) did not decrease the safeguards effectiveness of the Commission-approved PSP.

### 3.0 TECHNICAL EVALUATION

The staff evaluated these changes consistent with the regulatory and technical basis for alternative measure discussed in the NRC letter dated March 30, 2015. The staff compared the licensee's proposed changes as indicated in the submittal to staff's evaluation of alternative actions.

The staff compared the changes made in the OCNGS PSP, Revision 13 against the previous Revision 12 and noted that OCNGS PSP, Revision 13 contained eleven changes for Oyster Creek as stated in the "Table of Changes for Security Plan Change Submittal" of the Security Plan.

The licensee implemented changes to the PSP Training & Qualification Plan and the Safeguards Contingency Plan. Specifically, the licensee made changes to (1) insider mitigation program; (2) security badges; (3) security measures related to the access of the Reactor Building (RB); (4) Owner Control Area (OCA) surveillance; (5) security tours in the RB; and (6) T&QP: protocols and personnel training.

As part of the review, the staff identified additional areas to be considered for future security plan change per 10 CFR 50.54(p). These areas are clarifications and administrative in nature with regard to identification of security tasks and role and responsibility of operators and radiological protection staff to be included in the appropriate section of the PSP. These additional discussions do not impact the overall assessment of staff's finding of the proposed OCNGS PSP revision 13. On August 19, 2015, the staff conducted a discussion with the licensee pertaining to inclusion of the above areas in future PSP update.

Based on staff assessment of the licensee's implementation of the NRC's approval of the alternative measure per the NRC letter dated March 30, 2015, the staff finds that these changes are consistent with staff findings to support regulatory positions as stated in the staff safety evaluation report (ADAMS Accession No.ML14329A625).

### 4.0 CONCLUSION

The staff determined that the licensee properly concluded that the reported changes did not result in a decrease in safeguards effectiveness and recommends no further regulatory actions. The effectiveness of the implementation of this revision is subject to future NRC review and inspection.

5.0 REVIEWED BY: Meagan Parker

July 30, 2015

ADAMS Accession Number: ML15239A474

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