



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 29, 2016

Mr. Peter P. Sena, III
President
PSEG Nuclear LLC – N09
P.O. Box 236
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK GENERATING STATION AND SALEM NUCLEAR
GENERATING STATION, UNIT NOS. 1 AND 2 - REVIEW OF SECURITY PLAN,
REVISION 17, CHANGES (CAC NOS. MF7010, MF7011, AND MF7012)

Dear Mr. Sena:

By letter dated September 21, 2015,¹ PSEG Nuclear LLC (the licensee) submitted Revision 17 of the Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program, for the Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2, pursuant to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(p)(2). The enclosure to the September 21, 2015, letter contains Safeguards Information that is protected under 10 CFR 73.21 and 10 CFR 73.22 and is withheld from public access pursuant to the requirements of 10 CFR 2.390.

Pursuant to 10 CFR 50.54(p)(2), the licensee may make changes to the security plans without prior U.S. Nuclear Regulatory Commission (NRC or the Commission) approval if the changes do not decrease the safeguards effectiveness of the security plans. The NRC staff's review consisted of determining whether the licensee properly concluded that changes in the revision did not decrease the safeguards effectiveness of the Commission-approved security plans. The NRC staff concluded that the proposed changes in Revision 17 did not involve a decrease in the safeguards effectiveness of the security plan as described in 10 CFR 50.54(p). The licensee provided supplemental information to support the review of Revision 17 in response to a request for additional information.

A copy of the related NRC staff's evaluation of Revision 17 of the Security Plan is enclosed. The NRC staff did not identify any technical issues that warrant followup action at this time. The effectiveness of the implementation of the identified changes in the revised security plans is subject to future NRC review and inspection.

¹ Agencywide Documents Access and Management System Accession No. ML15273A366

P. Sena, III

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If you have any questions, please contact me at 301-415-1603 or Carleen.Parker@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Carleen J. Parker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Carleen J. Parker, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-354, 50-272, and 50-311

Enclosure:
As stated

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UNITED STATES
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EVALUATION BY THE OFFICE OF NUCLEAR SECURITY AND INCIDENT RESPONSE

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

PSEG NUCLEAR LLC

HOPE CREEK GENERATING STATION

SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-354, 50-272, AND 50-311

1.0 INTRODUCTION

By letter dated September 21, 2015,¹ PSEG Nuclear LLC (PSEG, the licensee) submitted Revision 17 of the Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program, for the Hope Creek Generating Station (Hope Creek) and Salem Nuclear Generating Station, Units 1 and 2 (Salem), pursuant to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(p)(2).

2.0 REGULATORY EVALUATION

The U.S. Nuclear Regulatory Commission (NRC or the Commission) staff reviewed Revision 17 of PSEG's Security Plan against the regulatory requirements and guidance listed below to ensure no decrease in effectiveness occurred.

- 10 CFR 50.54, "Conditions of licensees," paragraph (p)(2), which states, in part:

The licensee may make changes to the plans ... without prior Commission approval if the changes do not decrease the safeguards effectiveness of the plan. The licensee shall ... submit ... a report [to the NRC] containing the description of each change within 2 months after the change is made.

- The applicable requirements of 10 CFR Part 73, "Physical Protection of Plants and Materials."
- Office of Nuclear Security and Incident Response Procedure LIC 800, "Security Review Procedure for 10 CFR 50.54(p)(2)."

¹ Agencywide Documents Access and Management System Accession No. ML15273A366

- NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Section 13.6.1, "Physical Security Combined License and Operating Reactors."
- Nuclear Energy Institute (NEI) 03-12, Revision 7, "Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Program]."
- NEI 11-08, Revision 0, "Guidance on Submitting Security Plan Changes."

3.0 TECHNICAL EVALUATION

The NRC staff compared the changes described in Revision 17 with the previous Revision 16 of the security plans, which was dated December 22, 2014,² and referred to the guidance documents listed above. The NRC staff noted that Salem and Hope Creek Security Plan, Revision 17, contained the following change:

- The licensee states that certain security posts were eliminated based on expert opinion, challenge drills, reviews of exercise and tabletop results, and computer modeling that determined the elimination of these posts removed redundancy and constitutes no decrease in the safeguards effectiveness of the security plan.

The NRC staff requested additional information from the licensee in order to assess the impact of the above change on the plans effectiveness. The information and figures (maps and drawings) in the licensee's June 15, 2016, response provided adequate clarification of the issues for which the information was requested. The NRC staff determined that certain figures, containing maps and drawings, that was provided in the June 15, 2016, response are required to be included in the Security Plan, in accordance with 10 CFR Part 73, Appendix C, paragraph II.B.3.b. However the licensee's response did not include a commitment to update the next revision to the Salem and Hope Creek security plans with these required figures. The enclosure to the June 15, 2016, RAI response contains Safeguards Information that is protected under 10 CFR 73.21 and 10 CFR 73.22 and is withheld from public access pursuant to the requirements of 10 CFR 2.390.

On August 30, 2016, NRC staff conducted a site licensing visit as a followup to the June 15, 2016, RAI responses. While on-site, the staff reviewed documents pertaining to the site changes, walked down the affected areas, and participated in an overview of the vulnerability assessment tool. In regard to computer modeling, the licensee discussed site-specific security protective strategy through an application of vulnerability assessments and the development of modeling techniques using a computer-based simulation software. The computer-based simulation and site-specific model were validated through subject matter experts, plant walkdown, insights from tabletop and exercise results, and previous NRC inspections. The discussion of the modeling approach and simulation techniques, site-specific training, and qualifications of security personnel, provided the NRC staff with an overall understanding of an effective protective strategy.

During the site visit, the staff provided clarification to the licensee as to why the figures (maps and drawings) in the RAI response discussed above needed to be provided with the security

² Agencywide Documents Access and Management System (ADAMS) Accession No. ML14358A309

plans. The licensee agreed and provided a verbal commitment to update the next revision of the site security plans with the required figures.

4.0 CONCLUSION

The NRC staff determined that PSEG properly concluded that the reported changes to the Salem and Hope Creek Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program, Revision 17, did not result in a decrease in safeguards effectiveness. The NRC staff recommends no further regulatory action at this time. The effectiveness of the implementation of Revision 17 is subject to future NRC review and inspection.

Principal Contributor: Judy Petrucelli, NSIR

Date: September 29, 2016

P. Sena, III

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If you have any questions, please contact me at 301-415-1603 or Carleen.Parker@nrc.gov.

Sincerely,

/RA/

Carleen J. Parker, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-354, 50-272, and 50-311

Enclosure:
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