



FirstEnergy Nuclear Operating Company

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May 8, 2019

L-19-084

10 CFR 50.54(p)(2)

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

**SUBJECT:**

Beaver Valley Power Station, Unit Nos. 1 and 2  
BV-1 Docket No. 50-334, License No. DPR-66  
BV-2 Docket No. 50-412, License No. NPF-73  
Beaver Valley Power Station Physical Security Plan (Revision 24)

This letter forwards Revision 24 of the Beaver Valley Power Station (BVPS) Physical Security Plan (PSP) which was effective on March 20, 2019. The enclosure provides a summary of the PSP Revision 24 changes. These changes were reviewed and determined not to decrease the safeguards effectiveness of the BVPS PSP. Accordingly, this revision is being submitted in accordance with 10 CFR 50.54(p)(2).

The attached revision of the BVPS PSP and supporting information is Safeguards Information and must be withheld from public disclosure under the provisions of 10 CFR 73.21.

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Michael A. Fox, Manager – Site Protection, at (724) 682-7812.

Sincerely,



*Richard D. Bologna*

Richard D. Bologna  
Site Vice President

Enclosure:

Summary of BVPS Physical Security Plan, Revision 24 Changes

SDDI

NRR

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Attachment:  
BVPS Physical Security Plan, Revision 24 Changes and supporting information

cc: NRC Region I Administrator  
NRC Senior Resident Inspector (w/o attachment)  
NRR Project Manager (w/o attachment)  
Director BRP/DEP (w/o attachment)  
Site BRP/DEP Representative (w/o attachment)

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The following summarizes the Beaver Valley Power Station (BVPS) Physical Security Plan (PSP), Revision 24 Changes:

On March 20 2019, Revision 24 to the Beaver Valley Power Station (BVPS) Physical Security Plan (PSP) was made effective. This PSP revision reflects enhancement opportunities with the inclusion of a figure depicting the Protected Area Boundary within the Primary Access Facility and the reference to the approved partial exemption letter to 10 CFR Part 73, Section 73.2, dated September 6, 2018.

The following PSP sections of the BVPS PSP were affected by the Revision 24 changes:

- Index
- Chapter 11- Physical Barriers
- Figures- Figure 1-4 Primary Access Facility Protected Area Boundary

Specifically, Revision 24 of the BVPS PSP revised Chapter 11, Physical Barriers, Section 11.3 to include reference to the approved exemption of 10 CFR Part 73, Section 73.2 "Definitions" for fences. Per the specific exemption letter by Beaver Valley Power Station and the Davis Besse and Perry Nuclear Power Plants dated July 19, 2017, the approved partial exemption allows the licensees to configure the bracket topper supporting three strands of barbed wire or similar material at the vertical orientation only at specific locations along the protected area perimeter fence. This part of the change to Revision 24 was to include the reference to the exemption letter only.

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As an improvement opportunity, a reference to Figure 1-4 depicting the PAF Protected Area Boundary was added to Chapter 11, Physical Barriers section 11.3 and the addition of Figure 1-4, Primary Access Facility Protected Area Boundary was included in the Figures Section. The PSP Index was revised to include these changes.

Based on the analysis of performance objectives defined in 10 CFR 73.55 (b) through (r), 10 CFR 73.54, and 10 CFR 73.58, these changes do not decrease the Safeguards effectiveness of the BVPS PSP to meet the 10 CFR 73.55 (b) titled "General Performance Objectives and Requirements." Therefore, these changes are suitable for submittal under 10 CFR 50.54(p)(2).

BVPS PSP Revision 24 is being submitted utilizing the criteria described in NEI 11-08, Revision 0, titled "Guidance on Submitting Security Plan Changes". 10 CFR 50.54(p)(2) permits changes to the Security Plan without prior NRC approval if the changes do not decrease the effectiveness of the plan. The changes in this case have been proven to NOT decrease effectiveness of the Protective Strategy.

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Attachment  
BVPS Physical Security Plan, Revision 24 Changes and supporting information

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