



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

NOV - 9 1995

Mr. Donald F. Schnell
Senior Vice President, Nuclear
Union Electric Company
Callaway Plant
Post Office Box 149
St. Louis, MO. 63166

SUBJECT: CALLAWAY PLANT SECURITY PLAN, REVISIONS 21A AND 22

This acknowledges the receipt of your letters dated February 21, 1995, and March 23, 1995, by which you transmitted Revisions 21A and 22 of your Security, Contingency and Guard Training and Qualification Plans (plans). These revisions, submitted under the provisions of 10 CFR 50.54(p) to the NRC Region III office, were recently forwarded to the Region IV office for review.

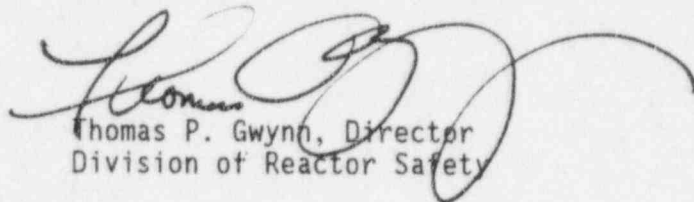
We have determined that portions of these plan changes are consistent with the provisions of 10 CFR 50.54(p), and are acceptable. However, the enclosure identifies exceptions that were discussed during telephone conversations between Messrs. J. Clark of your staff and D. Schaefer of this office on October 24 and 26, 1995. These exceptions either: (1) did not meet the criteria of 10 CFR 50.54(p) in that they decreased the effectiveness of the above plans, or (2) lacked sufficient detail to be acceptable for inclusion in the plans pursuant to 10 CFR 50.54(p). Those changes identified in the enclosure as decreasing the effectiveness of the above plans may, if desired, be submitted pursuant to 10 CFR 50.90.

For those changes identified in the enclosure as not meeting the 10 CFR 50.54(p) criteria, you should resubmit corrected plan pages, as soon as possible, reverting to previously approved plan revisions.

The enclosures to your letters contain Safeguards Information of a type specified in 10 CFR 73.21 and are being withheld from public disclosure.

If you have any questions concerning this matter, please contact Mr. Blaine Murray of my staff at (817) 860-8126.

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Safety

Docket: 50-483
License: NPF-30

Enclosure: As stated

cc:
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Board of Directors Coalition
for the Environment
ATTN: Dan I. Bolef, President
Kay Drey, Representative
6267 Delmar Boulevard
University City, Missouri 65130

Donald F. Schnell

-3-

bcc w/nonsafeguards portion of letters dated February 21 and March 23, 1995
DMB (RG01)

L. J. Callan

Resident Inspector, Callaway

MIS System

Branch Chief (DRP/B)

Project Engineer (DRP/B)

Branch Chief (DRP/TSS)

Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

RIV File

RITS Coordinator

PSB Action Item File (Goines)

50.54(p) Book (Goines)

Elaine Koup, NRR/DOTS/SGB (MS 9-D24)

Robert Skelton, NRR/DOTS/TSGB (MS 9-D24)

DOCUMENT NAME: S:\GOINES\S95-4041.dws

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DWSchaefer:nh <i>nh</i>	BMurray <i>BM</i>	KEBrockman <i>KE</i>	TPGwynn	
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Donald F. Schnell

-3-

bcc w/nonsafeguards portion of letters dated February 21 and March 23, 1995

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210014

COMMENTS ON CALLAWAY SECURITY PLANS, REVISIONS 21A AND 22

PAGE	SECTION	REMARKS
1-6	N/A	The removal of Figure 1.2-2 of the Security Plan, (Security Department Organization Chart) meets the criteria in 10 CFR 50.54(p), providing the structure of the security organization is documented in written security procedures, in accordance with 10 CFR 73.55(b)(3)(i). Additionally, this change was not marked (on page 1-6) as being a change.
1-6	1.2	The change in the Security Plan regarding post instructions states that they are "used as aids." This portion of the change is similar to a change submitted in Revision 21, and basically invalidates the intent and decreases the effectiveness of security post orders, and consequently does not meet the criteria of 10 CFR 50.54(p). If desired, this change may be submitted pursuant to 10 CFR 50.90.
1-22	1.6.1.3	As explained by the licensee via telephone, the purpose of this change in the Security Plan is to provide for the immediate valid use of security keys by plant operations and fire watch personnel to enter vital areas in the event that the card readers at the entrance to these areas are inoperative (i.e., during loss of security computers). Under these circumstances the region staff strongly supports this change. The specific type of "security system failure" needs to be further defined (i.e., loss entrance card readers). Additionally, this change needs to explain that in the interest of the safe operation of the plant or safety to personnel, there must exist a valid and immediate need for operations or fire watch personnel to enter the vital area(s). Once these limiting provisions are included in this change, these personnel may then (as stated in the security plan) "be required to report entries into vital areas to one of the alarm stations, the Key Issue Station or a member of the security force posted at the portal for logging purposes."
1-31	1.6.5	This Security Plan change provides that personnel in the material receiving area are exempted from personal search requirements when the temporary protected area boundary is reconfigured to allow delivery of materials. As written, this change reduces the overall effectiveness of the plan and does not meet the criteria in 10 CFR 50.54(p). However, this provision could be allowed if it is limited to only badged personnel, and also insures that these personnel do not exit the Warehouse material receiving area (through Door SR-105) into the owner controlled area, thereby minimizing their access to contraband.

4-4 4.6

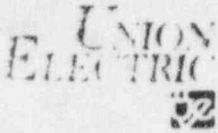
This Security Plan change provides that interior Doors SR101, SR102, SR103, and SR104 are exempted from testing when the receiving area is manned by a member of the security force. These door are interior Warehouse doors and constitute part of the "floating" protected area (PA) barrier during the time that the material receiving area is operational.

As written, this change reduces the overall effectiveness of the plan and does not meet the criteria in 10 CFR 50.54(p). However, this provision could be allowed if the licensee commits to testing those "floating" doors that are routinely opened and closed to establish the PA barrier, each time the material search area is placed into operation. Interior "floating" doors at the material receiving area that are not routinely opened and closed, need to be tested weekly in accordance with Chapter 12. Otherwise this change may be submitted pursuant to 10 CFR 50.90.

1-2 1.2

Revision 21, previously reviewed by NRC, proposed to change this section to read that **armed response force personnel** shall demonstrate their physical fitness annually. In reply, NRC disallowed this proposed change in that it did not meet the criteria of 10 CFR 50.54(p). The regulations require that all **armed individuals** receive such annual testing.

This change could be allowed if the licensee clarifies that all armed individuals receive such annual testing. Otherwise this change may be submitted pursuant to 10 CFR 50.90.



P 867 526 039

February 21, 1995
ULNRC-3149

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT I
FACILITY OPERATING LICENSE NUP-30
PHYSICAL SECURITY PLAN, REVISION 21A**

Pursuant to the requirements of 10 CFR 50.54(p), Union Electric Company furnishes six copies of Revision 21A of the Callaway Plant Physical Security Plan. Distribution of these documents is outlined on the attachment. Changes incorporated into this revision are consistent with 10 CFR 50.54(p) and do not decrease the effectiveness of the security program.

If you have any questions regarding these documents, please contact D. T. Fitzgerald or J. A. Clark at (314)676-8300.

Very truly yours,

Donald F. Schnell
Senior Vice President
Nuclear

DFS/JAC:ssm
Enclosure
(1 original and 3 copies)

COPY

The enclosed document contains
Safeguards Information within the
scope of 10 CFR 73.21. Removal of
enclosures declassifies this document.

9503150141 - 2 PP

cc w/attachment: J. B. Martin, Regional Administrator (2 copies)
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Washington, DC 20037



P 867 526 044

March 23, 1995
ULNRC-3162

J. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT I
FACILITY OPERATING LICENSE NPP-80
PHYSICAL SECURITY PLAN, REVISION 22**

Pursuant to the requirements of 10 CFR 50.54(p), Union Electric Company is furnishing six copies of revised portions of the Callaway Plant Physical Security Plan. This revision (#22) will include a List of Effective Pages. The List of Effective Pages reflects the current revision number of each page and the drawings included in the Physical Security Plan, the Contingency Plan and the Security Force Training and Qualification Plan.

Changes incorporated into revision 22 are consistent with 10 CFR 50.54(p) and do not decrease the effectiveness of the security program.

If you have any questions regarding these documents, please contact D. T. Fitzgerald or J. A. Clark at (314)676-8300.

Very truly yours,

Garry L. Randolph
Garry L. Randolph
Vice President
Nuclear Operations

GLR/JAC:ssm
Enclosure
(1 original and 3 copies)

The enclosed document contains
Safeguards Information within the
scope of 10 CFR 73.21. Removal of
enclosures declassifies this document.

WJ0250 48 UN

9503280155 2pp.

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This Revision merely relocated the security administrative offices from outside of the protected area to inside the PA - - into the former secondary access facility. No other changes were made.

