



December 8, 1999

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

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Subject: Byron Station Security Plan and Training and Qualification Plan,
Revision 53

In accordance with 10 CFR 50.54 (p)(2), "Conditions of licenses," we are submitting changes to the Commonwealth Edison (ComEd) Company Byron Station Security Plan and the Security Personnel Training and Qualification Plan, which is Appendix B to the Byron Station Security Plan. In accordance with 10 CFR 50.4(b)(4), "Security plan and related submittals," attached are the original and three (3) copies of the Byron Station Security Plan, Revision 53.

Byron Station Security Plan, Revision 53, includes the following changes:

A revised defensive strategy was formulated and tested for Byron Station. This defensive strategy was demonstrated during the Operational Safeguards Response Evaluation (OSRE) Regional Assist evaluation conducted in November 1998. Through the use of tabletop exercises and field drills, the revised defensive strategy was proven to defend the plant against the design basis threat as described in 10 CFR 73.1, "Physical Protection of Plants and Materials, Purpose and Scope." This revised defensive strategy reduces the required number of armed responders.

Due to the implementation of the revised defensive strategy, responders were relocated to strategic positions. Based on these new positions, the methods used for compensatory measure implementation were modified. This change meets the requirements set forth in 10 CFR 73.55(c)(4), "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage; Physical barriers," which addresses the detection of penetration or attempted penetration of the protected area or the isolation zone adjacent to the protected area.

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As part of the revised defensive strategy, the contingency weapon was evaluated. It was determined that a different type of weapon would provide the most effective defensive strategy. The Byron Station Security Plan was changed to reflect the replacement of the weapon designated for contingency use. In addition, the change included a revision to the weapons qualification course to correspond with the new contingency weapon. Through the use of tabletop exercises and field drills, the revised defensive strategy utilizing the new weapon, was proven to defend the plant against the design basis threat as described in 10 CFR 73.1.

10 CFR 73.55(d)(8), "Access Requirements," was deleted on September 7, 1995, allowing licensees to remove the requirement for containment doors to be locked and alarmed, along with the need to control access during periods of high traffic. Consequently, Byron Station has removed the lock and alarm functions from several doors located within an existing Vital Area.

In accordance with a December 2, 1997, change to 10 CFR 73.55(d)(7)(i)(A), "Access Requirements," Byron Station has amended the reapproval schedule for the Vital Area access authorization list. The reapproval was changed from once every 31 days to at least quarterly.

Under the current Byron Station Security Plan commitments, Byron Station must change all keys, locks, combinations, and related access control devices at least once every twelve months. The revised 10 CFR 73.55(d)(8) dated December 2, 1997, removes the requirement for an annual change to access control devices. As permitted by the revised 10 CFR 73.55(d)(8), Byron Station has revised the Station Security Plan to require an access control device change for cause, or when there is evidence or suspicion that an access control device may have been compromised.

Other changes have been made that are considered "editorial" in nature. These changes effect terms and titles that are no longer applicable and do not decrease the overall level of security system performance.

These changes to the Byron Station Security Plan were implemented on October 8, 1999. Pursuant to 10 CFR 50.54 (p)(2), this description of the changes is required to be submitted to the NRC by December 8, 1999.

As required by 10 CFR 50.54(p)(2), we have concluded that these changes do not decrease the safeguards effectiveness of the Byron Station Security Plan.

Please note that Attachment 2, "Byron Station Security Plan," Revision 53, contains Safeguards Information that must be protected from public disclosure as required by 10 CFR 73.21, "Requirements for the protection of safeguards information."

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Should you have any questions concerning this matter, please contact Mr. J. A. Bauer at (630) 663-7287.

Respectfully,



R. M. Krich
Vice President – Regulatory Services

Attachments: Attachment 1, Byron Station Security Plan, and Security Personnel Training and Qualification Plan, Revision 53, Change Matrix
Attachment 2, Byron Station Security Plan, and Security Personnel Training and Qualification Plan, Revision 53

cc: Regional Administrator – NRC Region III (2 copies)

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ATTACHMENT 1

**Byron Station Security Plan, and Security Personnel Training
and Qualification Plan, Revision 53
Change Matrix**

CHANGE NO.	DESCRIPTION OF CHANGE	SECURITY PLAN SECTION(S)	REASON FOR CHANGE
1.	Required number of armed responders was reduced.	3.2.4 3.2.6 11.1	Implementation of a revised defensive strategy.
2.	Responders were relocated to strategic positions.	8.4	Implementation of a revised defensive strategy.
3.	Different weapon was designed for contingency use and the weapons qualification course was revised.	Appendix B 4.2 5.1 5.2.1 5.3	Implementation of a revised defensive strategy.
4.	Eliminated several access portals that were located within an existing Vital Area.	5.3.1 5.3.2 Figure 5-4 Figure 5-5 Figure 5-6 Figure 5-8 Figure 5-9 Figure 5-10 Figure 5-11 Figure 5-12	10 CFR 73.55 (d)(8) was amended in <u>September 1995</u> ; this change eliminates the need for these doors.
5.	Changed the review schedule for the access authorization list.	7.2.1	10 CFR 73.55 (d)(7)(i)(A) dated <u>December 1997</u> allows for a quarterly review.
6.	Eliminated the requirement to rotate keys and locks on a scheduled basis.	7.6	10 CFR 73.55 (d)(8) dated <u>December 1997</u> removed the requirement.
7.	Editorial changes	5.1 5.2.4	Terms and titles have changed and are no longer valid.

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