



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

August 27, 2012

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING SECURITY PLAN REVIEW

Dear Mr. Pacilio:

By letter dated July 13, 2012 (Agencywide Documents Access and Management System Accession No. ML12198A300), Exelon Generation Company, LLC submitted the Three Mile Island Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 14.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). The questions were sent via electronic transmission on August 16, 2012, to Mr. David Helker and Ms. Wendi Croft, of your staff. The draft questions were sent to ensure that the questions were understandable, the regulatory basis was clear, and to determine if the information was previously docketed. Mr. Helker communicated to the NRC staff that a clarification call regarding the draft RAI was not necessary. It was agreed that a response to this RAI would be submitted by September 28, 2012.

Please contact me at 301-415-2833, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Peter Bamford".

Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:
As stated

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

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

EXELON GENERATION CO, LLC

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

DOCKET NO. 50-289

By letter dated July 13, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12198A300), Exelon Generation Company, LLC (Exelon, the licensee) submitted the Three Mile Island Nuclear Power Station's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 14. The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission (NRC) staff is currently reviewing the submittal to ensure compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(p)(2). The NRC staff has determined that the additional information requested below is needed to complete its review. In addition, as specified below, the NRC staff has requested certain clarifications for the next update of the PSP and SCP.

1. In Section 15.1 of the PSP, the licensee describes illumination at Three Mile Nuclear Station. Describe how the use of alternative technology for the assessment of the protected area (PA) perimeter in no-light or low-light conditions meets the requirements of 10 CFR 73.55(e)(7)(i)(C) and 10 CFR 73.55(i)(2). Describe the technology used for the assessment of the PA perimeter in no-light or low-light conditions. Additionally, the NRC staff requests that Exelon make appropriate changes during the next revision of the site's PSP to ensure that the language clearly describes what technology is used for the assessment of the PA perimeter in no-light or low-light conditions in accordance with 10 CFR 73.55(c)(3).
2. In Section 15.5.1 of the PSP, the licensee describes the owner controlled area (OCA) surveillance methods. The second numbered paragraph does not adequately address the surveillance methods; it solely discusses facility procedures. Describe what equipment and/or personnel are used for the OCA surveillance. Additionally, the NRC staff requests that Exelon make appropriate changes during the next revision of the site's PSP to ensure that the language clearly describes the equipment and/or personnel used for the OCA surveillance in accordance with 10 CFR 73.55(c)(3).
3. In Section 4.1.2 of the SCP, the licensee describes the security chain of command and delegation of authority. The description of the security chain of command and delegation of authority in Revision 13 of the SCP is different than the description provided in Revision 14. This change was not described in the Description of Changes Report in Revision 14. Provide an explanation of the rationale for the change. Describe who is responsible for command and control when the individuals listed are not available. Additionally, the NRC staff requests that Exelon make appropriate changes during the

Enclosure

next revision of the site's SCP to ensure that the language clearly describes the security chain of command and delegation of authority in accordance with 10 CFR 73.55(c)(5).

4. In Section 5.4 of the SCP, the licensee describes facility operations personnel response. The description of training in Revision 13 of the SCP is different than the description provided in Revision 14. This change was not described in the Description of Changes report in Revision 14. Provide an explanation of the change. Was this change evaluated to ensure it complies with 10 CFR 50.54(p)(2)? Additionally, the NRC staff requests that Exelon make appropriate changes during the next revision of the site's SCP Section 5.4 to ensure that the language clearly describes the training related to the facility operations personnel response in accordance with 10 CFR 73.55(c)(5).

5. In Section 7 of the SCP, the licensee describes its OCA vehicle checkpoints. It is unclear from the language whether the OCA vehicle checkpoints meet the requirements of 10 CFR 73.55(h)(2)(iii) and 10 CFR 73.55(h)(2)(v). Describe the OCA vehicle checkpoints and how they meet the requirements of 10 CFR 73.55(h)(2)(iii) and 10 CFR 73.55(h)(2)(v). Additionally, the NRC staff requests that Exelon make appropriate changes during the next revision of the site's SCP to ensure that the language clearly describes the OCA vehicle checkpoints in accordance with 10 CFR 73.55(c)(5).

August 27, 2012

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Sincerely,
/ra/

Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
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*via email

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