



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

November 1, 2012

Mr. Timothy S. Rausch  
Senior Vice President and Chief Nuclear Officer  
PPL Susquehanna, LLC  
769 Salem Boulevard  
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION REGARDING REVISION 9 TO THE PPL SUSQUEHANNA LLC SECURITY PLAN, TRAINING & QUALIFICATION PLAN, SAFEGUARDS CONTINGENCY PLAN, AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION SECURITY PROGRAM (TAC NO. D91660)

Dear Mr. Rausch:

By letter dated July 31, 2012,<sup>1</sup> PPL Susquehanna, LLC, (the licensee) submitted Susquehanna Steam Electric Station's Physical Security Plan (PSP), Training and Qualification Plan, and Safeguards Contingency Plan, Revision 9. 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). To complete its review, the NRC staff requests responses to the enclosed questions.

The draft questions were sent to Mr. James Gorman, of your staff, to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. On October 30, 2012, Mr. Gorman agreed that you would provide a response by November 26, 2012.

If you have any questions regarding this matter, please contact me at 301-415-4090.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Whited".

Jeffrey A. Whited, Project Manager  
Plant Licensing Branch 1-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure: As stated

cc w/encl: Distribution via Listserv

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML12219A224

OFFICE OF NUCLEAR SECURITY AND INCIDENT RESPONSE

REQUEST FOR ADDITIONAL INFORMATION

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

PPL SUSQUEHANNA, LLC

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 50-388

LICENSE NOS. NFP-14 AND NFP-22

By letter dated July 31, 2012,<sup>1</sup> PPL Susquehanna, LLC, (the licensee) submitted Susquehanna Steam Electric Station's Physical Security Plan (PSP), Training and Qualification Plan, and Safeguards Contingency Plan, Revision 9. 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.

1. Section 3 of the PSP describes the performance evaluation program. The third paragraph of this section discusses 10 CFR Part 100 criteria. This language was removed from the NRC endorsed NEI 03-12, Revision 7, "Security Plan Template," for security plans because it did not accurately reflect the requirements of 10 CFR 73.55(b)(3). If this was an administrative oversight, confirm that the physical protection program and protective strategy design (that is used as the basis for the implementation of the performance evaluation program) is based on meeting the general performance objective and requirements of 10 CFR 73.55(b). If this was not an administrative oversight, describe how the 10 CFR Part 100 criteria, discussed in the third paragraph, meets the general performance objective and requirements of 10 CFR 73.55(b)(3). Additionally, appropriate changes should be made during the next revision of the site's PSP to ensure the language clearly describes the performance evaluation program.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(b)(3), the physical protection program must be designed to prevent significant core damage and spent fuel sabotage.

2. Section 14.4.4 describes vehicle searches at the protected area (PA). The language in this section was changed to account for Security Frequently Asked Question

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(SFAQ) 12-06. However, the language in the PSP is not consistent with the resolution to SFAQ 12-06. Describe the specific security measures that are documented in site procedures as referenced in Section 14.4.4 of the PSP, for armed security officers re-entering the PA and how the procedures meet the requirements of 10 CFR 73.55(h)(3)(i). Additionally, appropriate changes should be made during the next revision of the site's PSP to ensure the language clearly describes the PA search process for armed security officers.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(h)(3)(i), the search for firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage shall be accomplished through the use of equipment capable of detecting these items, or through visual and physical searches, or both, to ensure that all items are clearly identified before granting access to PAs. The licensee shall subject all persons except official Federal, state, and local law enforcement personnel on official duty to these searches upon entry to the PA. Armed security officers, who are on duty and have exited the PA, may re-enter the PA without being searched for firearms.

3. Section 19.3 of the PSP describes access to the perimeter system for testing and maintenance and conditions for this process that must be met. Describe how the process for maintaining the search integrity of on-duty security personnel, as identified in Section 19.3 of the PSP, meets the requirements of 10 CFR 73.55(h)(3)(i). See SFAQs 12-06 and 12-12. Additionally, appropriate changes should be made during the next revision of the site's PSP to ensure the language clearly describes the process for access and maintaining search integrity at this location.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(h)(3)(i), the search for firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage shall be accomplished through the use of equipment capable of detecting these items, or through visual and physical searches, or both, to ensure that all items are clearly identified before granting access to PAs. The licensee shall subject all persons except official Federal, state, and local law enforcement personnel on official duty to these searches upon entry to the PA. Armed security officers who are on duty and have exited the PA may re-enter the PA without being searched for firearms.

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Jeffrey A. Whited, Project Manager  
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