

LICENSE APPLICATION

LA Chapter 9 Physical Protection

9-1 Describe the physical security and safeguards plans which will be put in place for transportation activities at Rowley Junction.

- A separate RAI will be provided regarding the information previously submitted by PFS.

RESPONSE

As stated in SAR Section 4.5, operations at the intermodal transfer point will be performed under the requirements of 10 CFR 71. Therefore, security operations while spent fuel is present at the transfer point, will be in accordance with the requirements of 10 CFR 73.37, "Requirements for Physical Protection of Irradiated Reactor Fuel in Transit," including specific requirements of sections (c) "Shipments by Road" and (d) "Shipments by Rail." These security operations will include:

- Notification to the NRC of planned shipments,
- Use of security procedures for coping with safeguards emergencies,
- Use of full time escorts to maintain visual surveillance of the shipment,
- Establishment of a continuously staffed communications center that maintains contact with the shipment escorts,
- Maintenance of written logs by the escorts of the shipment and significant events,
- Arrangements with local law enforcement agency (LLEA) for their response as necessary,
- Maintain communications with a communications center at least every 2 hours, LLEA, and one another to provide shipment status and report safeguards emergencies,
- NRC approval of shipment routes and transfer point, and
- Training of escort personnel per 10 CFR 73, Appendix D.

The intermodal transfer point is a transition from shipment by rail to shipment by road, both of which will meet the requirements listed above. The PFS will maintain escort staff for both rail and road security. While in transit, the status of the spent fuel shipment will be continuously monitored, including the intermodal transfer point, by the communications center.

Additional security measures that will be implemented at the intermodal point include the following:

- An 8 ft. high chain link security fence encompassing the entire site,

- including the weather enclosure, railroad spur tracks, and yard area.
- A Metal building (weather enclosure) housing the crane and transfer equipment.
- Locks on the gates and building doors to help prevent unauthorized entry of the site when unoccupied by PSFS personnel.
- High pressure sodium yard lights that will fully illuminate the site throughout the night.
- Procedures that verify integrity of equipment prior to every transfer operation.
- Motion detectors located around the yard and in the building that will alarm at the PFSF if tripped.

In the event the motion detectors are tripped while the point is unoccupied, several actions will be taken to ensure the security and integrity of the intermodal point equipment, which include:

- Dispatching security personnel to investigate the site for any unauthorized entry.
- Procedures for inspecting and testing transfer equipment prior to reuse.