

# SAFEGUARDS INFORMATION

# Exelon<sup>SM</sup>

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## Nuclear

10 CFR 50.90

RS-01-057

March 23, 2001

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

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

Dresden Nuclear Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Subject: Request for NRC Approval of Physical Security and Guard Force Training and Qualification Plan Changes in Accordance With 10 CFR 50.90, "Application for amendment of license or construction permit"

Reference: Letter from R.M. Krich (Commonwealth Edison Company), "Request for Exemption from Certain Requirements of 10 CFR 73 'Physical Protection of Plants and Materials,'" dated May 2, 2000

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC requests changes to the Physical Security and Guard Force Training and Qualification Plans of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30 for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, respectively.

**ATTACHMENTS (B-1 THROUGH B-5) CONTAIN SAFEGUARDS INFORMATION**  
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The proposed changes will modify current escorting and control requirements for non-designated vehicles, lighting requirements for exterior areas within the Protected Area, and annual weapons qualifications. These changes are being proposed to provide relief from unnecessary resource burdens.

The proposed changes were previously submitted to the NRC in the referenced letter as requests for exemption from certain provisions of 10 CFR 73.55. As a result of discussions between Mr. A. Mendiola of the NRC and Mr. J. V. Sipek, the NRC requested that we withdraw these exemption requests and submit as changes to the Physical Security Plan and Guard Force Training and Qualification Plan requiring prior NRC approval in accordance with 10 CFR 50.90. Accordingly, this letter requests withdrawal of the exemption requests in the referenced letter.

This amendment request is subdivided as follows.

1. Attachment A provides a description and safety analysis of the proposed changes.
2. Attachments B-1, B-2, B-3, B-4, and B-5 provide the marked-up current Security Plan pages with the proposed changes indicated for Braidwood Station, Byron Station, Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station, respectively.
3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.91(a), "Notice for public comment," paragraph (1), which provides information supporting a finding of no significant hazards consideration using the standards in 10 CFR 50.92, "Issuance of amendment," paragraph (c).
4. Attachment D provides information supporting an Environmental Assessment. We have determined that the proposed changes meet the criteria for a categorical exclusion set forth in paragraph (c)(10) of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review."

We request that the NRC review and approve the proposed Physical Security Plan and Guard Force Training and Qualification Plan changes as soon as possible.

These proposed changes have been reviewed by the respective Plant Operations Review Committees and Nuclear Safety Review Boards in accordance with the requirements of the EGC Quality Assurance Program.

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We are notifying the State of Illinois of this amendment request by transmitting a copy of this letter to the designated State Official.

If you have any questions about this letter, please contact Mr. Allan R. Haeger at (630) 663-6645.

Respectfully,



R. M. Krich  
Director - Licensing  
Mid-West Regional Operating Group

Attachments: Affidavit  
Attachment A, Description and Safety Analysis for Proposed Changes  
Attachment B-1, Marked-up Current Security Plan Pages for Proposed Change,  
Braidwood Station  
Attachment B-2, Marked-up Current Security Plan Pages for Proposed Change,  
Byron Station  
Attachment B-3, Marked-up Current Security Plan Pages for Proposed Change,  
Dresden Nuclear Power Station  
Attachment B-4, Marked-up Current Security Plan Pages for Proposed Change,  
LaSalle County Station  
Attachment B-5, Marked-up Current Security Plan Pages for Proposed Change,  
Quad Cities Nuclear Power Station  
Attachment C, Information Supporting a Finding of No Significant Hazards  
Consideration  
Attachment D, Information Supporting an Environmental Assessment

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Braidwood Station  
NRC Senior Resident Inspector – Byron Station  
NRC Senior Resident Inspector – Dresden Nuclear Power Station  
NRC Senior Resident Inspector – LaSalle County Station  
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station  
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

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# SAFEGUARDS INFORMATION

STATE OF ILLINOIS	)	
COUNTY OF DUPAGE	)	
IN THE MATTER OF	)	
EXELON GENERATION COMPANY	)	Docket Numbers
BRAIDWOOD STATION - UNITS 1 AND 2	)	STN 50-456 AND STN 50-457
BYRON STATION - UNITS 1 AND 2	)	STN 50-454 AND STN 50-455
DRESDEN NUCLEAR POWER STATION - UNITS 2 AND 3	)	50-237 AND 50-249
LASALLE COUNTY STATION - UNITS 1 AND 2	)	50-373 AND 50-374
QUAD CITIES NUCLEAR POWER STATION - UNITS 1 AND 2	)	50-254 AND 50-265

**SUBJECT:** Request for Physical Security Plan and Guard Force Training and Qualification Plan Changes to Modify Certain Requirements Contained in 10 CFR 73, "Physical Protection of Plants and Materials"

**AFFIDAVIT**

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

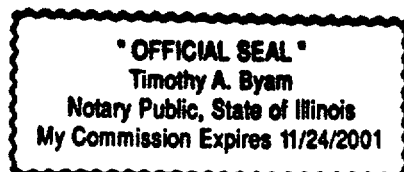
  
 R. M. Krich  
 Director - Licensing  
 Midwest Operating Group

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 23<sup>rd</sup> day of

March, 2001.

  
 Notary Public



**ATTACHMENT A**  
**Request for NRC Approval of Physical Security and Guard Force Training and Qualification Plan Changes**

Braidwood Station, Units 1 and 2  
Byron Station, Units 1 and 2  
Dresden Nuclear Power Station, Units 2 and 3  
LaSalle County Station, Units 1 and 2  
Quad Cities Nuclear Power Station, Units 1 and 2

**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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**A. SUMMARY OF PROPOSED CHANGES**

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC requests changes to the Physical Security and Guard Force Training and Qualification Plans of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30 for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Dresden Nuclear Power Station (DNPS), Units 2 and 3, LaSalle County Station (LCS), Units 1 and 2, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively. The proposed changes will modify current escorting and control requirements for non-designated vehicles, lighting requirements for exterior areas within the protected area, and annual weapons qualifications.

A complete description of the proposed changes is given in Section E, "Description of the Proposed Changes," of this Attachment. Attachments B-1, B-2, B-3, B-4, and B-5 provide the marked-up current Physical Security Plan and Guard Force Training and Qualification Plan pages with the proposed changes indicated for Braidwood Station, Byron Station, DNPS, LCS, and QCNPS, respectively.

**B. DESCRIPTION OF THE CURRENT REQUIREMENTS**

Vehicle Escort and Control

The Physical Security Plan currently requires all non-designated vehicles to be escorted by a member of the security organization equipped with a chemical agent. Non-designated vehicles are defined as: vehicles not intended for normal use within the protected area (e.g., delivery vehicles). The Physical Security Plan requires that the security escort must remain with the non-designated vehicle unless it is parked and secured. Furthermore, designated vehicles must be positively controlled to assure authorized use.

Lighting

The Physical Security Plan currently requires illumination of at least 0.2 foot-candles within the isolation zone and all exterior areas of the protected area. Additionally, actions must be taken to compensate for shadowed areas (i.e., areas not meeting the minimum illumination measurement) and lighting failures.

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Quad Cities Nuclear Power Station, Units 1 and 2

**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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Annual Weapons Qualifications

The Physical Security Plan currently requires all armed security force members to be requalified in the use of assigned weapons at least every twelve months.

**C. BASIS FOR THE CURRENT REQUIREMENTS**

Vehicle Escort and Control

10 CFR 73.55(d), "Access Requirements," subsection (4) requires the following.

"All vehicles, except as indicated in this paragraph, requiring entry into the protected area must be escorted by a member of the security organization while within the protected area and, to the extent practicable, must be off loaded in the protected area at a specific designated materials receiving area that is not adjacent to a vital area."

and

"The licensee shall exercise positive control over all such designated vehicles to assure that they are used only by authorized persons and for authorized purposes."

Exterior Lighting within Protected Area

10 CFR 73.55(c), "Physical barriers," subsection (5) requires the following.

"Isolation zones and all exterior areas within the protected area shall be provided with illumination sufficient for the monitoring and observation requirements of paragraphs (c)(3), (c)(4), and (h)(4) of this section, but not less than 0.2 foot-candle measured horizontally at ground level."

Annual Weapons Qualification

10 CFR 73, Appendix B, "General Criteria for Security Personnel," Section IV. A., requires the following.

"Handgun - Guards, armed escorts and armed response personnel shall qualify with a revolver or semiautomatic pistol firing the national police course, or an equivalent nationally recognized course. Qualifying score shall be an accumulated total of 70 percent of the maximum obtainable score."

10 CFR 73, Appendix B, Section IV. B., requires the following.

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**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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“Semiautomatic Rifle - Guards, armed escorts and armed response personnel, assigned to use the semiautomatic rifle by the licensee training and qualification plan, shall qualify with a semiautomatic rifle by firing the 100-yard course of fire specified in section 17.5(1) of the National Rifle Association, High Power Rifle Rules book (effective March 15, 1976), or a nationally recognized equivalent course of fire. Targets used shall be as stated in section 17.5 for the 100-yard course. Time limits for individuals shall be as specified in section 8.2 of the NRA rule book, regardless of the course fired. Qualifying score shall be an accumulated total of 80 percent of the maximum obtainable score.”

10 CFR 73, Appendix B, Section IV. C., requires the following.

“Shotgun - Guards, armed escorts and armed response personnel, assigned to use the 12 gauge shotgun by the licensee training and qualification plan shall qualify with a full choke or improved modified choke 12 gauge shotgun firing the following course:

15 yds.....Hip fire point.....4 rounds.....B-27 target  
25 yds.....Shoulder.....4 rounds.....B-27 target

To qualify the individual shall be required to place 50 percent of all pellets (36 pellets) within the black silhouette.”

10 CFR 73, Appendix B, IV. D., requires the following.

“Requalification - Individuals shall be weapons requalified at least every 12 months in accordance with the NRC approved licensee training and qualification plan.”

**D. NEED FOR THE REVISION OF THE REQUIREMENTS**

In 1999, the NRC Commissioners directed the NRC to develop a regulation requiring licensees to identify equipment target sets necessary to maintain safe operation or safe shutdown, develop strategies to protect such equipment, and exercise the strategies. In November 1999, the NRC advocated a comprehensive review of 10 CFR 73.55, “Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage,” while concurrently approving a shift from NRC-evaluated Operational Safeguards Response Evaluation (OSRE) exercises to an industry self-assessment program (SAP). These changes represented a departure from compliance-based assessment to an emphasis on program performance. In order to effectively implement the self-assessment program, changes to certain commitments and/or

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**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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regulations are necessary. The requirements affected by these proposed changes have little or no value in the protection of the facility against a design basis threat as described in 10 CFR 73, "Physical Protection of Plants and Materials," paragraph 1(a).

The current OSRE program evaluates the security program against performance-based criteria rather than against compliance with specific regulations. The OSRE program has demonstrated that the established defensive strategies are adequate to protect against the threat of radiological sabotage. These defensive strategies have been proven to be effective without reliance on the requirements which we are proposing to change.

**E. DESCRIPTION OF THE PROPOSED CHANGES**

Vehicle Escort and Control

The proposed change would revise the Physical Security Plan and Guard Force Training and Qualification Plan to remove the requirement for any vehicle entering the protected area to be escorted by a member of the security organization. Additionally, the requirement and associated training and qualification for the use of the chemical agent would be eliminated from the vehicle escort responsibilities. Vehicles entering or being used within the protected area would either be driven by individuals who have been granted unescorted access, or escorted by individuals who are badged and granted unescorted access. In either case, all vehicles will be searched upon entry to the protected area and then driven or escorted by persons that have been granted unescorted access. The requirement for security to positively control the vehicles within the protected area will be removed from the Physical Security Plan.

Exterior Lighting within Protected Area

The proposed change would revise the Physical Security Plan to remove the requirement to provide 0.2 foot-candles of illumination for all exterior areas within the protected area. The proposed change would maintain the 0.2 foot-candles of illumination requirement within the isolation zone to ensure the assessment capability for the detection of penetration or attempted penetration of the protected area or isolation zone adjacent to the protected area barrier as required by 10 CFR 73.55(c), subsection (4). Illumination within all exterior areas of the protected area will be maintained in accordance with Occupational Safety and Health Administration (OSHA) standards.



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Quad Cities Nuclear Power Station, Units 1 and 2

**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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Annual Weapons Qualification

The proposed change would modify the Physical Security Plan to remove the requirement for armed security force members to requalify annually on the standard courses of fire in accordance with 10 CFR 73, App. B, Sections IV. A., B., and C. Under the proposed change we would continue to initially qualify armed security force members in accordance with 10 CFR 73, App. B, Sections IV. A., B., and C., to assure that we have proficient responders. However, annual weapons requalification would be changed to be consistent with our defensive strategy positions and would not include the standard courses of fire currently identified in our training and qualification plan. Following initial weapons qualification, armed individuals would be required to annually demonstrate weapons proficiency on a National Rifle Association (NRA) approved tactical and combat shooting weapons course that incorporates firing under stressful conditions.

The tactical and combat weapons course would provide or reinforce necessary contingency skills such as decision making, critical thinking, and marksmanship through performance of the following.

- Firing at individual and multiple targets at various distances
- Firing from elevated positions
- "Shoot" and "Don't Shoot" scenarios
- Firing through gun portal/window
- Reloading
- Clearing weapons malfunction
- Weapons transitioning (i.e., safety)
- Moving targets
- Reaction under stress
- Utilization of cover
- Firing while wearing respirator
- Weak-hand shooting
- Ability to use communications/radio while in firing scenario

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**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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**F. SAFETY ANALYSIS OF THE PROPOSED CHANGES**

Vehicle Escort and Control

Actions that assure adequate vehicle searches for firearms, explosives, and incendiary devices will be maintained. Vehicles will be searched in accordance with 10 CFR 73.55(d)(4). Packages for delivery into the protected area will be handled in accordance with 10 CFR 73.55(d)(3) and personnel operating or escorting the vehicle will be subject to the search requirements of 10 CFR 73.55(d)(1). Badged individuals acting as vehicle escorts are subject to the behavioral observation program and are trained in escort duties, including the fitness for duty responsibilities in accordance with 10 CFR 26.22, "Training of supervisors and escorts," subsection (b). Therefore, there is no increased risk to the facility by allowing badged personnel to escort or operate vehicles inside the protected area. Because vehicles within the protected area have been searched and are only accessible only to badged or escorted persons, the requirement for security to positively control a vehicle yields no security benefit and is proposed to be removed from the Physical Security Plan.

The proposed change does not adversely affect nuclear safety or plant operations.

Exterior Lighting within Protected Area

Maintaining 0.2 foot-candles of illumination within the isolation zone is critical for determining whether or not a threat exists. At the time of a confirmed intrusion or attempted intrusion to the isolation zone, security response personnel implement actions necessary to neutralize the threat. However, maintaining 0.2 foot-candles of illumination within all exterior areas of the protected area does not add value in assessing a threat that may occur at the isolation zone since, as described above, the strategy does not rely on sufficient lighting in the areas outside of the isolation zone to carry out actions to protect the facility. Maintaining exterior protected area lighting to the OSHA standards is sufficient for the security force to initiate and carry out response actions necessary to protect the facility against the threat of the design basis threat as described in 10 CFR 73.1, "Purpose and Scope," paragraph 1(a).

The proposed change does not adversely affect nuclear safety or plant operations.

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**DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES**

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Annual Weapons Qualification

As part of the NRC's OSRE program, responders are required to demonstrate their weapons skills in a stressful environment that replicates their defensive posture within the defensive strategy. The current qualification course involves stationary target firing under mild to favorable conditions. Due to the combination of the current requirements and the OSRE expectations, we are conducting two weapons training and qualification programs annually.

Replacing the annual compliance-based training and qualification with a performance-based (i.e., stress fire) program will result in a more realistic evaluation of the security responder's ability to protect the facility.

The proposed change does not adversely affect nuclear safety or plant operations.

**G. IMPACT ON PREVIOUS SUBMITTALS**

All license amendment requests for Braidwood Station, Byron Station, DNPS, LCS, and QCNPS were evaluated to determine the potential impact of this amendment request. No other pending license amendment requests are affected by this amendment request.

**H. SCHEDULE REQUIREMENTS**

We request that the NRC review and approve the proposed Physical Security and Guard Force Training and Qualification Plan changes as soon as possible.

**ATTACHMENT C**  
**Request for NRC Approval of Physical Security and Guard Force Training and Qualification Plan Changes**

**INFORMATION SUPPORTING A FINDING OF  
NO SIGNIFICANT HAZARD CONSIDERATION**

According to 10 CFR 50.92(c), "Issuance of amendment," a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;

Create the possibility of a new or different kind of accident from any previously analyzed, or;

Involve a significant reduction in the margin of safety.

In support of this determination, an evaluation of each three criteria set forth in 10 CFR 50.92 is provided below regarding the proposed license amendment.

**Overview**

Exelon Generation Company (EGC), LLC is requesting changes to Physical Security Plan and Guard Force Training and Qualification Plans of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30, for Braidwood Station, Byron Station, Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station, respectively. The proposed changes will modify current escorting and control requirements for non-designated vehicles, lighting requirements for exterior areas within the protected area, and annual weapons qualifications.

**The proposed Physical Security and Guard Force Training and Qualification Plan changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.**

No physical plant changes are being made as a result of changing the vehicle, lighting, and weapons qualification requirements. The proposed changes involve revising requirements that provide little or no value in the protection of the facility with regards to the design basis threat as described in 10 CFR 73, "Physical Protection of Plants and Materials," paragraph 1(a). Because the defensive strategies at each station have been proven to be effective without reliance on these requirements, it is concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

**ATTACHMENT C**  
**Request for NRC Approval of Physical Security and Guard Force Training and Qualification Plan Changes**

**INFORMATION SUPPORTING A FINDING OF  
NO SIGNIFICANT HAZARD CONSIDERATION**

**The proposed Physical Security and Guard Force Training and Qualification Plan changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.**

There are no physical changes being made to the plant as a result of changing the vehicle, lighting, and weapons qualification requirements. The defensive strategies at each station remain unchanged under the proposed changes. A review of possible intrusion scenarios has confirmed that no event would result in a new sequence of events that could lead to a new accident scenario. Based on this review, it is concluded that no accident scenarios, failure mechanisms or limiting single failures are introduced as a result of the proposed changes. Therefore, the proposed Physical Security Plan and Guard Force Training and Qualification Plan changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

**The proposed Physical Security and Guard Force Training and Qualification Plan changes do not involve a significant reduction in the margin of safety.**

It has been shown during recent Operational Safeguards Readiness Evaluations (OSRE), that the proposed changes do not impact the security's ability to protect the facility from the threat of radiological sabotage. The risk of radiological sabotage would not be increased by changing the vehicle, lighting, and weapons qualification requirements. Additionally, proposed change in weapons qualifications provides a more realistic evaluation of a responder's ability to protect the station from the threat of radiological sabotage. Based on this review, the proposed amendment does not involve a significant reduction in the margin of safety.

**Overall Conclusion**

Based upon the above analysis and evaluations, we have concluded that the proposed changes to the Physical Security Plan and Guard Force Training and Qualification Plan involve no significant hazards consideration.

**ATTACHMENT D**  
**Request for NRC Approval of Physical Security and Guard Force Training and Qualification Plan Changes**

**INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT**

Exelon Generation Company (EGC), LLC is requesting changes to Physical Security Plan and Guard Force Training and Qualification Plans of Facility Operating License Nos. NPF-72, NPF-77, NPF-37, NPF-66, DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30, for Braidwood Station, Byron Station, Dresden Nuclear Power Station, LaSalle County Station, and Quad Cities Nuclear Power Station, respectively. The proposed change will modify current escorting and control requirements for non-designated vehicles, lighting requirements for exterior areas within the protected area, and annual weapons qualification.

EGC has evaluated this proposed operating license amendment consistent with the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." EGC has determined that the proposed changes meet the criteria for categorical exclusion set forth in paragraph (c)(9) of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," and as such, has determined that no irreversible consequences exist in accordance with paragraph (b) of 10 CFR 50.92, "Issuance of amendment." This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or that changes an inspection or a surveillance requirement, and the proposed amendment meets the following specific criteria.

**(i) The proposed changes involve no significant hazards consideration.**

As demonstrated in Attachment C, the proposed changes do not involve a significant hazards consideration.

**(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.**

**Non-Radiological Effluent Releases**

Changing vehicle, lighting, and weapons qualification requirements will have no effect on the type or amount of non-radiological effluent releases and will have no effect on effluent discharge permit limitations or other conditions associated with the operation of the plant. None of the data contained in the Environmental Report or the latest National Pollutant Discharge Elimination System (NPDES) Permits will be affected. The changes involve security measures; consequently, there is no significant change in the types or a significant increase in the amounts of non-radiological effluents that may be released offsite.

**ATTACHMENT D**  
**Request for NRC Approval of Physical Security and Guard Force Training and**  
**Qualification Plan Changes**

**INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT**

**Radiological Effluent Releases**

Changing the vehicle, lighting, and weapons qualification requirements will have no physical effect on the type or amount of liquid, solid, or gaseous radiological effluent releases of the plant. The changes involve security measures; consequently, there is no significant change in the types or a significant increase in the amounts of non-radiological effluents that may be released offsite.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.**

Changing the vehicle, lighting, and weapons qualification requirements will have no effect on the level of controls methodology used for personnel radiation protection, the processing of radioactive effluents or handling of solid radioactive waste. In addition, the changes do not result in a significant change in the normal radiation levels within the plant. It is therefore concluded that there will be no significant increase in individual or cumulative occupational radiation exposure resulting from this change.

**Overall Conclusion**

Based on this review, it has been determined that the proposed changes meet the criteria for a categorical exclusion set forth in paragraph (c)(9) of 10 CFR 51.22, and as such, has determined that no irreversible consequences exist in accordance with paragraph (b) of 10 CFR 50.92.