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RS-01-267

December 3, 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: Additional Information Supporting Changes to the Physical and Guard Force Training and Qualification Plans for Braidwood, Byron, Dresden, LaSalle, and Quad Cities Stations

- References:
- 1) Letter from R. M. Krich (Exelon Generation Company, LLC) to U. S. NRC, "Request for NRC Approval of Physical Security and Guard Force Training and Qualification Plan Changes in Accordance With 10 CFR 50.90," dated March 23, 2001
 - 2) U. S. NRC letter, "Request For Additional Information; Changes to the Physical and Guard Force Training and Qualification Plans for Braidwood, Byron, Dresden, LaSalle, and Quad Cities (TAC Nos. MB1589, MB1590, MB1592, MB1593, MB1594, MB1595, MB1596, and MB1598)," dated September 13, 2001

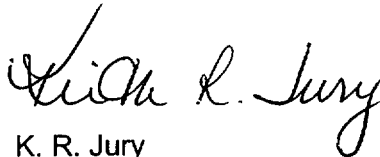
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In Reference 1, Exelon Generation Company (EGC), LLC, submitted a request for changes to the Physical Security and Guard Force Training and Qualification Plans for Braidwood Station, Byron Station, Dresden Nuclear Power Station, LaSalle County Station and Quad Cities Nuclear Power Station. The proposed changes requested modification of the current escorting and control requirements for non-designated vehicles, lighting requirements for exterior areas within the Protected Area, and requirements for annual weapons qualifications.

In Reference 2, the NRC requested additional information to complete the review of the proposed changes regarding annual weapons qualification. EGC was requested to respond to this request for additional information by October 13, 2001. In a telephone conference on October 10, 2001, between Mr. G. F. Dick of the NRC and Mr. A. R. Haeger of EGC, it was agreed that EGC would provide the response for the additional information based on resource availability. The attachment to this letter provides the response for additional information.

Should you have any questions related to this letter, please contact Mr. Brian Sweeney at (630) 657-2836.

Respectfully,



K. R. Jury
Director – Licensing
Mid-West Regional Operating Group

Attachments:

Affidavit

Additional Information Supporting Changes to the Physical and Guard Force Training and Qualification Plans for Braidwood, Byron, Dresden, LaSalle, and Quad Cities Stations

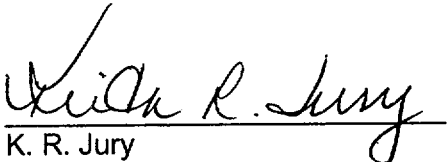
cc: Regional Administrator – NRC Region III
 NRC Senior Resident Inspector – Braidwood Station
 NRC Senior Resident Inspector – Byron Station
 NRC Senior Resident Inspector – Dresden Nuclear Power Station
 NRC Senior Resident Inspector – LaSalle County Station
 NRC Senior Resident Inspector – Quad Cities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

STATE OF ILLINOIS)	
COUNTY OF DUPAGE)	
IN THE MATTER OF)	
EXELON GENERATION COMPANY, LLC)	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: Additional Information Supporting Changes to the Physical and Guard Force Training and Qualification Plans for Braidwood, Byron, Dresden, LaSalle, and Quad Cities Stations

AFFIDAVIT

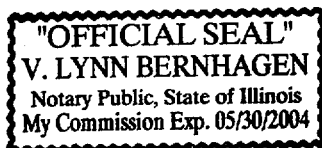
I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.


 K. R. Jury
 Director – Licensing
 Mid-West Regional Operating Group

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

for the State above named, this 3rd day of

December, 2001.




 Notary Public

Attachment

Additional Information Supporting Changes to the Physical and Guard Force Training and Qualification Plans for Braidwood, Byron, Dresden, LaSalle, and Quad Cities Stations

Question

- 1) *Appendix B to 10 CFR Part 73 requires that armed individuals document their weapons qualification and requalification with a specific score that is maintained on file for three years. In addition, 10 CFR 73.55 provides that the NRC may authorize activities other than those required by 10 CFR 73.55(a) provided that the same high level assurance and an equivalent level of protection are maintained as specified in the remainder of 10 CFR Part 73, which references Appendix B. Please provide the basis for concluding that guard requalification by demonstrating 'proficiency' provides a similar assurance to the requirements in Appendix B.*

Response

Exelon Generation Company (EGC), LLC, has concluded that our proposed change, regarding annual weapons qualification, meets or exceeds the requirements in 10 CFR 73, Appendix B, "General Criteria for Security Personnel," for the following reasons:

- requalification will continue to be documented and maintained in accordance with 10 CFR 73, Appendix B;
- conventional scoring will be replaced by thirteen key elements, including target neutralization, that will be evaluated as "satisfactory" or "unsatisfactory"; and
- the stress-fire course, being proposed for weapons requalification, is specifically designed to simulate situations that security personnel may encounter during an actual on-site contingency event.

10 CFR 73, Appendix B, requires that armed individuals document their weapons qualification and requalification with a score that is maintained on file for three years. In the proposed change, EGC would continue to initially qualify armed security force members in accordance with 10 CFR 73, Appendix B. However, the subsequent requalifications would be accomplished through the use of a National Rifle Association (NRA) approved tactical and combat shooting course (i.e., stress-fire course). In all cases, the documentation of the initial qualification score and completion of requalification will be maintained on file for three years.

Due to the nature of a stress-fire course, assigning a numeric value is not achievable for all elements contained within the course. For example, it would not be possible to assign a meaningful numeric value to elements such as: dealing with weapon malfunctions or transitioning from primary to secondary weapons. The stress-fire course consists of thirteen elements that are rated as "satisfactory" or "unsatisfactory." Rather than requiring

Attachment

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the tested individual qualify to a specified percentage of a maximum obtainable score, each element is independently evaluated by an NRA-qualified range instructor. The elements have specific evaluation criteria that must be accomplished in order to obtain a "satisfactory" rating. If any single element is evaluated as "unsatisfactory," then the individual fails the requalification. Seven of the thirteen elements require the individual to engage and neutralize one or more targets. Although a numeric value is not assigned to the overall completion of the stress-fire course, the evaluation is precise and consistent in identifying individual performance that is not acceptable.

The current 10 CFR 73, Appendix B, requalification course utilizes stationary target firing under mild to favorable conditions. EGC experience with the stress-fire course is that it establishes a higher performance standard by requiring security personnel perform within a realistic environment that simulates what they may experience during an actual contingency event. The stress-fire course performance requirements are as follows:

- prior to beginning the course, individuals perform physical activity to elevate heart rate and respiration;
- during the course the individuals are subjected to stressful distractions such as: malfunctioning weapons, moving targets, visual and psychological impairment with smoke, commands communicated via radio, and tactical movement between locations;
- time constraints are imposed for each stage of the course;
- the rate of target acquisition and engagement is aggressive with an expected 20 to 30 round expenditure at each stage;
- individuals are limited to only the amount of ammunition that they would have available during an actual contingency event; and
- all targets must be neutralized.

Based on the completion and retention of documentation, the evaluation of thirteen key elements, and the advantages of replicating the defensive strategy environment, EGC concludes that performing the annual weapons requalification by demonstrating proficiency on a stress-fire course meets or exceeds the requirements in 10 CFR 73, Appendix B.