

NSIR TECHNICAL REVIEW

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

NORTHERN STATES POWER COMPANY - MINNESOTA

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

LICENSE NO. DPR-22

1.0 INTRODUCTION

By letter dated February 4, 2015 (Agencywide Documents Access and Management System Accession No. ML15037A050), Northern States Power Company - Minnesota (NSPM), a Minnesota corporation, doing business as Xcel Energy (licensee), Docket No. 50-263, Renewed Facility Operating License No. DPR-22, submitted the Monticello Nuclear Generating Plant's (MNGP) Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 14, to the Nuclear Regulatory Commission (NRC) under the provisions of Title 10 to the *Code of Federal Regulations* (10 CFR), Part 50 "Domestic Licensing of Production and Utilization Facilities," section 50.54 "Conditions of License" paragraph (p)(2). The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure.

In response to this submittal, the staff of the Reactor Security Licensing Branch (RSLB), in the Division of Security Policy (DSP), conducted a review of the changes that were made to the MNGP security plan without prior Commission approval to confirm that these plan changes are permitted under the provisions of 10 CFR 50.54(p)(2) and that Revision 14 of the MNGP security plan continues to satisfy the requirements of 10 CFR 73.55(c) "Security Plans."

The RSLB staff review was conducted consistent with the guidance contained within the Office of Nuclear Security and Incident Response (NSIR) Procedure LIC 800 "Security Review Procedure for 10 CFR 50.54(p)(2);" the NRC's Standard Review Plan NUREG 0800, Chapter 13.6 "Physical Security;" Revision 7 of the NRC endorsed Nuclear Energy Institute (NEI) template for security plans (NEI 03-12); NRC policies; and current guidance published by the NRC relative to content of the NRC-approved security plans.

2.0 REGULATORY EVALUATION

Pursuant to 10 CFR 50.54(p)(2), the licensee may make changes to the plans without prior Commission approval if the changes do not decrease the safeguards effectiveness of the security plans. The licensee must submit a report to the NRC containing the description of each change, within two months after changes are made.

The RSLB staff review consisted of determining whether the licensee made a permissible change to the condition of license and properly concluded that the changes made to the security plan without prior Commission approval did not decrease the safeguards effectiveness of the Commission-approved security plans. Additionally, the NRC staff considered the requirements of 10 CFR 73.55(c) "Security plans" which requires that the licensee describe how Commission requirements will be implemented, to include site-specific conditions that affect how the licensee

implements Commission requirements. The security plans must describe how the performance objective and requirements of 10 CFR 73.55, will be implemented, how the criteria of Appendix B, to Part 73, will be implemented, and how the criteria Appendix C, to Part 73, will be implemented.

The effectiveness of this implementation is determined through the Baseline Inspection Program performed by region based inspectors. Where appropriate, this report identifies specific areas of the licensee security plan for which the RSLB reviewer recommends additional review by region based inspectors during the next scheduled baseline inspection, as appropriate.

3.0 TECHNICAL EVALUATION

The RSLB staff reviewer compared the changes made in the MNGP security plan, Revision 14 against the previous Revision 13. Upon review of the changes, the RSLB staff determined that additional information was necessary to complete its review. On April 15, 2015, RSLB staff sent a Request for Additional Information (RAI) (ADAMS Accession No. ML15105A016) to the Office of Nuclear Reactor Regulation staff which was subsequently issued to the licensee by email on April 30, 2015. In a letter dated May 22, 2015 the licensee responded to the April 30, 2015 RAI (ADAMS Accession No. ML15156A360). The enclosure to the May 22, 2015, letter contained Safeguards Information and is withheld from public disclosure.

Resolution: The RSLB staff reviewed the licensee response dated May 22, 2015, and determined that:

(Item # 1) The licensee response adequately addressed Item #1 as follows.

Change #1: PSP Section 11.2.3, Paragraph 1.

The MNGP RAI response specified the types and capabilities of the cameras used to provide monitoring, observation, and surveillance functions in the specified area.

The description included a combination of fixed CCTV and Pan-Tilt-Zoom cameras some of which utilize low-light technology. The licensee specified the location where each camera is monitored and by whom each is monitored. The licensee described uninterruptible and back-up power sources for each camera and how the affected area is monitored during hours of darkness to include lighting. The licensee also specified which components are described in Sections 15.1 and 15.2 of the PSP.

(Item # 2) The licensee response adequately addressed Item #2 as follows.

Change #1: PSP Section 11.2.3, Paragraph 1.

The MNGP RAI response described the types of events that will generate a response and contact with local law enforcement agencies (LLEA) should watercraft or other vehicles and personnel enter the specified area. Specifically, the licensee stated that notification to LLEA is not limited only watercraft that "stop" within this area and described the additional conditions for which a notification would be made.

(Item # 3) The licensee response adequately addressed Item #3 as follows.

Change #4: PSP Appendix B, Table 1 "Critical Task Matrix", Section 31, Paragraph 2. The MNGP RAI response confirmed that all Armed Responders (ARs) and Armed Security Officers (ASOs) are required to satisfy this Critical Task.

This review is closed.

4.0 CONCLUSION

The staff determined that the licensee properly concluded that the reported changes did not result in a decrease in safeguards effectiveness and recommends no further licensing actions specific to the security plan changes that were made without prior Commission approval and are contained in Revision 14 to the MNGP security plans. All descriptions provided in the MNGP security plans are subject to baseline inspection under the Reactor Oversight Program to determine compliance with the requirements of 10 CFR 73.55(c) and the effective implementation of Commission requirements contained in 10 CFR Part 73.

The effectiveness of the implementation of the identified revisions is subject to future NRC review and inspection.

5.0 REVIEWED BY:

Dennis Gordon

June 11, 2015