



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

June 30, 2015

Peter A. Gardner
Site Vice President
Monticello Nuclear Generating Plant
Northern States Power Company-Minnesota
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - EVALUATION OF
10 CFR 50.54(p)(2) CHANGES TO SECURITY PLANS (TAC NO. MF6194)

Dear Mr. Gardner:

By letter dated February 4, 2015, as supplemented by letter dated May 22, 2015, Northern States Power Company - Minnesota, doing business as Xcel Energy, submitted Revision 14 of the Monticello Nuclear Generating Plant Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program, under the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.54(p)(2).

The U.S. Nuclear Regulatory Commission (NRC) staff in the Office of Nuclear Security and Incident Response conducted a review of the submittal to confirm the changes were permitted under the provisions of 10 CFR 50.54(p)(2), and to verify that the requirements of 10 CFR 73.55(c) "Security Plans," continued to be satisfied. A copy of the NRC staff's evaluation is enclosed.

Please contact me at (301) 415-3049 or by e-mail at Terry.Beltz@nrc.gov, if you have any questions on this issue.

Sincerely,

A handwritten signature in black ink, reading "Terry A. Beltz", is positioned above the typed name.

Terry A. Beltz, Senior Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosure:
Staff Evaluation

cc w/encl: Distribution via Listserv



UNITED STATES
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STAFF EVALUATION OF 10 CFR 50.54(p)(2) CHANGES TO SECURITY PLANS

NORTHERN STATES POWER COMPANY - MINNESOTA

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

By letter dated February 4, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15037A050), Northern States Power Company - Minnesota (NSPM, the licensee), doing business as Xcel Energy, submitted Revision 14 to the Monticello Nuclear Generating Plant (MNGP) Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Plan (hereafter referred to as the Security Plan), 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 U.S. Nuclear Regulatory Commission (NRC) staff in the Office of Nuclear Security and Incident Response (NSIR) conducted a review of the changes that were made to the MNGP Security Plan without prior Commission approval to confirm the changes were 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 NRC staff's review was conducted consistent with the following guidance: (1) NSIR Office Procedure LIC 800, "Security Review Procedure for 10 CFR 50.54(p)(2)"; (2) NRC Standard Review Plan NUREG 0800, Chapter 13.6, "Physical Security"; (3) Revision 7 of NRC-endorsed Nuclear Energy Institute (NEI) template for security plans (NEI 03-12); (4) NRC policies; and (5) the current guidance published by the NRC relative to content of the NRC-approved security plans.

The regulations in 10 CFR 50.54(p)(2) state, in part, that 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 NRC staff's review consisted of determining whether the licensee made a permissible change to the condition of its 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 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. Security plans must describe how the performance objective and requirements of 10 CFR 73.55 will be implemented; how the

Enclosure

criteria of Part 73, Appendix B, will be implemented; and how the criteria of Part 73, Appendix C, 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's security plan for which the NSIR staff recommends additional review by region-based inspectors during the next scheduled baseline inspection, as appropriate.

The NRC staff compared the changes made in Revision 14 of the MNGP Security Plan against the previous Revision 13. Upon review of the changes, the staff determined that additional information was necessary to complete its review. The staff issued requests for additional information to the licensee in an e-mail dated April 30, 2015 (ADAMS Accession No. ML15131A324), which contains security-related information and is non-publicly available. The licensee provided its response to the RAIs in a letter dated May 22, 2015 (ADAMS Accession No. ML15156A360), which includes an enclosure that contains safeguards information and is being withheld from public disclosure.

The NRC staff reviewed the responses in the May 22, 2015, letter, and determined that:

- Item 1: Change #1 – Physical Security Plan (PSP), Section 11.2.3, Paragraph 1

The licensee's 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 closed-circuit television (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: Change #1 – PSP, Section 11.2.3, Paragraph 1

The licensee's 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 to only watercraft that "stop" within this area and described the additional conditions for which a notification would be made.

- Item 3: Change #4 – PSP, Appendix B, Table 1, "Critical Task Matrix," Section 31, Paragraph 2

The licensee's response confirmed that all Armed Responders (ARs) and Armed Security Officers (ASOs) are required to satisfy this Critical Task.

The NRC staff determined that the licensee properly concluded that the reported changes did not result in a decrease in safeguards effectiveness. Therefore, the staff 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 Plan.

All descriptions provided in the MNGP security plans are subject to baseline inspections under the NRC's Reactor Oversight Program to determine compliance with the requirements specified in 10 CFR 73.55(c), and verifying 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.

Principal Contributor: Dennis Gordon, NSIR/DSP

June 30, 2015

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Sincerely,

/RA/

Terry A. Beltz, Senior Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosure:
Staff Evaluation

cc w/encl: Distribution via Listserv

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DGordon, NSIR/DSP

ADAMS Accession No.: ML15175A016 *via memo dated 06/11/2015 ** via e-mail dated 06/26/2015

OFFICE	DORL/LPL3-1/PM	DORL/LPL1-1/LA **	NSIR/DSP/BC *	DORL/LPL3-1/BC	DORL/LPL3-1/PM
NAME	TBeltz	KGoldstein	DHuyck	DPelton	TBeltz
DATE	06/23/2015	06/26/2015	06/11/2015	06/30/2015	06/30/2015

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