

~~SAFEGUARDS INFORMATION~~



Crystal River Nuclear Plant  
15760 W. Power Line Street  
Crystal River, FL 34428  
Docket 72-1035  
Docket 50-302  
Operating License No. DPR-72

May 24, 2016  
3F0516-01

10 CFR 50.90

72-1004

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

Subject: Crystal River Unit 3—License Amendment Request #321, Revision 0, ISFSI Only  
Physical Security Plan

References:

1. AREVA to NRC Application for Amendment 14 to Standardized NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0, dated April 16, 2015 (ADAMS Accession No. ML15114A056)
2. AREVA to NRC Application for Amendment 14 to Standardized NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 1, Response to First Request for Additional Information, dated November 11, 2015 (ADAMS Accession Nos. ML15114A050, ML15114A051)
3. NRC to CR-3 Letter - Issuance of Order for Implementation of Additional Measures and Fingerprinting for Unescorted Access at the Crystal River Nuclear Generating Plant Independent Spent Fuel Storage Installation dated February 24, 2016.
4. Crystal River Unit 3 to NRC—Twenty Day Response to NRC Letter Providing Issuance of Order for Implementation of Additional Measures and Fingerprinting for Unescorted Access at the Crystal River Nuclear Generating Plant Independent Spent Fuel Storage Installation., dated March 9, 2016 (ADAMS Accession No. ML16069A367)
5. Crystal River Unit 3 to NRC—License Amendment Request #320- Cyber Security Plan Implementation Schedule Milestone 8, dated March 31, 2016 (ADAMS Accession No. ML1691A308)

Dear Sir:

Pursuant to 10 CFR 50.90, Duke Energy Florida, LLC, previously known as Duke Energy Florida, Inc. (DEF), hereby requests a license amendment pertaining to the Crystal River Nuclear Plant Unit 3 (CR-3) Physical security, Training and Qualification, Safeguards Contingency and Cyber Security Plans, and a proposed revision to the existing Physical and Cyber Security license condition (2.D) in the facility operating license. Specifically, the replacement of the existing Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan with a new combined Independent Spent Fuel Storage Installation (ISFSI) Only Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, referred to from here on out as the PLAN. In addition, the deletion of the cyber security license condition and one minor non technical correction to a punctuation error.

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NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "~~SECURITY-RELATED INFORMATION~~"  
AND ENCLOSURES 3, 4, and 5 TO THIS LETTER CONTAIN "~~SAFEGUARDS INFORMATION.~~"  
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The PLAN will supersede the current Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plans at CR-3. The PLAN addresses the protection of material on site that is licensed by the CR-3 Operating License, with the following two exceptions that are addressed in a separate plan: Four (4) surveillance capsules located within the reactor vessel wall, and the materials subject to the requirements of 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material." The future site configuration that is reflected in the PLAN assumes that the spent fuel in the spent fuel pool has been moved to the ISFSI and that there is no requirement to return spent fuel to the spent fuel pool ("ISFSI only" status). Spent fuel movement to the ISFSI is currently scheduled to be completed in 2018.

AREVA LLC (AREVA) is the holder of Certificate of Compliance (CoC) 1004 for the Standardized NUHOMS® System, which is used to store spent fuel at the CR-3 ISFSI. Currently the technical specifications associated with this CoC require that under certain circumstances the cask must be returned to the spent fuel pool for inspection. AREVA submitted an Application for Amendment 14 to Standardized NUHOMS® CoC No. 1004 for Spent Fuel Storage Casks, Revision 0, on April 16, 2015 (Reference 1). AREVA submitted a revision to the above referenced Application for Amendment 14 of this CoC on November 11, 2015 (Reference 2). This revision requests the deletion of the requirement to return to the spent fuel pool for inspection. AREVA has requested approval of the CoC by October 2016. Once the CoC is revised, there will no longer be a requirement to return spent fuel to the spent fuel pool.

By letter dated February 24, 2016 (Reference 3), CR-3 was issued orders to provide Additional Security Measures and Fingerprinting for Unescorted Access at the CR-3 ISFSI. By letter dated March 9, 2016 (Reference 4), CR-3 responded to the orders with a schedule and how compliance would be met.

By letter dated March 31, 2016 (Reference 5), CR-3 requested a License Amendment to extend the Cyber Security Plan Implementation Schedule Milestone 8 due date to December 31, 2018, this date reflects when all nuclear fuel will be removed from the CR-3 Spent Fuel Pool and is expected to be placed on the ISFSI pad.

An evaluation of this proposed license amendment (LAR 321) is provided in Enclosure 1. The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the proposed changes involves no significant hazards consideration, the bases for these determinations are included in Enclosure 2. The PLAN is provided in Enclosure 3. Enclosure 4 contains the assumptions used in developing the PLAN. Pursuant to 10 CFR 73.55(r), alternative measures that have been incorporated into the proposed PLAN are discussed in Enclosure 5. A marked-up and redline version of the facility operating license pages for the Physical Protection license condition, reflecting the commitment change proposed in this submittal, are included as Enclosures 6 and 7. Enclosure 8 contains a redacted version of Enclosure 1, that when detached from this letter is decontrolled.

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In order to support site transition to "ISFSI only" status, CR-3 is requesting NRC approval of this proposed license amendment by December 31, 2017. CR-3 requests an implementation period of 60 days following submittal of written notification to the NRC that all the spent nuclear fuel assemblies have been transferred from the spent fuel pool to the ISFSI pad. In addition, this license amendment will not be implemented if there is a requirement to return spent fuel from the ISFSI to the spent fuel pool.


CR-3 requests that Enclosure 1, which contains Security-Related Information, be withheld from public disclosure in accordance with 10 CFR 2.390. Enclosures 3, 4, and 5 contain Safeguards Information as defined by 10 CFR 73.22 and their disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended.

In accordance with 10 CFR 50.91, DEF is notifying the State of Florida of this license amendment request by transmitting a copy of this letter and uncontrolled enclosures to the designated State Officials; The State will not receive anything Security-Related or Safeguards.

There are no regulatory commitments made within this submittal.

If you have any questions regarding this submittal, please contact Mr. Mark Van Sicklen, Licensing Lead, Nuclear Regulatory Affairs, at (352) 563-4795.

Sincerely,



Ronald R. Reising, Senior Vice President  
Operations Support

RRR/mvs

Enclosures:

1. Evaluation of Proposed Changes (Security-Related Information)
2. No Significant Hazards Consideration and Environmental Assessment (Uncontrolled)
3. Duke Energy Florida, LLC - Crystal River Unit 3 Independent Spent Fuel Storage Installation Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (Safeguards Information)
4. Programmatic Assumptions for ISFSI Only Sites (Safeguards Information)
5. Evaluations of Proposed Alternative Measures (Safeguards Information)
6. Facility Operating License Strikeout Pages (Uncontrolled)
7. Facility Operating License Revision Bar Pages (Uncontrolled)
8. REDACTED - Evaluation of Proposed Changes (Uncontrolled)

xc: NMSS Project Manager  
State of Florida (Uncontrolled Enclosures ONLY, No SGI or SRI material)

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