



Duquesne Light

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April 19, 1983

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. Harold R. Denton
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Application for License

Gentlemen:

Duquesne Light Company (DLC) has been requested by the NRC to submit a Physical Security Plan for Beaver Valley Power Station Unit No. 2 (BVPS-2), which is the unit currently under construction adjacent to Beaver Valley Power Station Unit No. 1 (BVPS-1).

BVPS-1 is an operating unit, and as such has a Physical Security Plan, approved by the NRC, in effect. This Physical Security Plan consists of three major parts: the base plan, the Training and Qualification Plan, and the Contingency Plan. The base plan contains the following chapters:

- Chapter 1 - Security Organization
- Chapter 2 - Facility and Environs
- Chapter 3 - Protected Area Perimeter
- Chapter 4 - Protected Areas
- Chapter 5 - Vital Area Perimeters
- Chapter 6 - Vital Areas
- Chapter 7 - Central Communications System
- Chapter 9 - Special Security Measures During Refueling/Major Maintenance Operations
- Chapter 10 - Special Security Measures During Construction Operations
- Chapter 11 - Overall Physical Security Program Performance
- Chapter 12 - Tests, Inspections, and Maintenance
- Chapter 13 - Security Records
- Chapter 14 - Security Audits

Please note that Chapter 8, Response to Security Contingencies is missing from this listing. Chapter 8 is the Contingency Plan mentioned earlier, and is considered to be such a major element of the Physical Security Plan that it is treated as one of the major three parts of the

plan. The Training and Qualification Plan also is not shown, for it was developed, submitted and approved after the base plan was approved.

Our intent is to modify our existing approved plan for BVPS-1 by adding to that plan the information that will describe the BVPS-2 Security program. Thus, we will have one Physical Security Plan for the Beaver Valley Site, including both BVPS-1 and BVPS-2, rather than a separate Physical Security Plan for each unit.

We do not anticipate that it will be necessary to change either the Contingency Plan or the Training and Qualification Plan portions of the Physical Security Plan because of the addition of BVPS-2. These portions are generic in that security response to contingency events will not be different between the two units, and the training and qualification of security personnel will not differ between the two units. The standards and requirements will be identical regardless of which unit is addressed.

Similarly, we see no requirement to change Chapters 7, 12, 13, and 14 to the existing Physical Security Plan because of the addition of BVPS-2. These chapters are generic to our physical security program, not to one individual unit.

Therefore, the major changes we have identified that will be made to the Physical Security Plan to incorporate BVPS-2 will be in Chapters 1 through 6 and 9 through 11, and those anticipated changes are summarized in the following paragraphs.

Chapter 1 - Security Organization

Additions to this chapter will describe any changes to the security organization to be made as a result of the addition of BVPS-2. As viewed at this time, this may involve an increase in the size of the minimum Security Force Composition and a possible increase in Security Force supervision.

Chapter 2 - Facility and Environs

Additions to this chapter will describe the general site and site area arrangement as it will be configured when BVPS-2 construction is completed.

Chapter 3 - Protected Area Perimeter

Additions to this chapter will describe the arrangement of the Protected Area Perimeter as it will be configured when BVPS-2 construction is completed. Since many of the hardware items to be installed, such as fences, will be identical in specification to

BVPS-1, changes to this chapter will primarily consist of layout descriptions and updated drawings.

Chapter 4 - Protected Areas

Additions to this chapter will describe the Protected Area as it will be configured when BVPS-2 construction is completed. These changes will primarily consist of layout descriptions and updated drawings.

Chapter 5 - Vital Area Perimeters

Additions to this chapter will describe the Vital Area Perimeters which will be created as a result of the addition of BVPS-2. These Vital Area Perimeters will be described using layout descriptions and updated drawings.

Chapter 6 - Vital Areas

Additions to this chapter will describe the Vital Areas which will be created as a result of the addition of BVPS-2. These Vital Areas will be described using layout descriptions and updated drawings.

Chapter 9 - Special Security Measures During Refueling/Major Maintenance Operations

This chapter will be revised as necessary to describe any outage measures which may be unique to BVPS-2, leaving in effect any outage measures unique to BVPS-1.

Chapter 10 - Special Security Measures During Construction Operations

It is anticipated that this chapter will be deleted upon completion of construction of BVPS-2, since it describes the interface between BVPS-1 and BVPS-2 during construction of BVPS-2. Thus, when BVPS-2 construction is completed, this chapter will have no function.

Chapter 11 - Overall Physical Security Program Performance

The primary revisions to be made in this chapter will be to reevaluate and modify response time for Response Force personnel due to the increase in size of the Protected Area and the addition of Vital Areas.

Please note that the hardware procurement for the BVPS-2 security system will not be complete until early 1984. Thus, these projected

changes should be considered to be projections. Actual equipment procurement and installation may somewhat alter the concept set forth in this letter.

Also, please note that BVPS-1 is an operating unit with an NRC-approved Physical Security Plan, and that this Security Plan has been determined by the NRC to be at a SALP 1 Level. We intend to apply this same level of expertise to the operation of the combined BVPS-1/BVPS-2 Security program.

DUQUESNE LIGHT COMPANY

By E. J. Woolever
E. J. Woolever
Vice President

TJZ/wjs

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 19th day of April, 1983, before me, a Notary Public in and for said Commonwealth and County, personally appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge.

Anita Elaine Reiter

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986