

ENCLOSURE 1

LICENSE AMENDMENT REQUEST AND SIGNIFICANT HAZARDS EVALUATION
FOR FACILITY LICENSE DPR-72,
CRYSTAL RIVER NUCLEAR PLANT, UNIT 3

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FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NO. 50-302/LICENSE NO. DPR-72

REQUEST NO. 117, REVISION 0

LICENSE DOCUMENT(S) INVOLVED: Modified Amended Security Plan

NRC REVIEW AND APPROVAL IS REQUIRED PRIOR TO IMPLEMENTATION.

REGULATORY BASIS.

This proposed change, which is a major revision of the November 1978 Modified Amended Security Plan (with revisions), is submitted as an application for amendment to the license pursuant to 10 CFR 50.90, in accordance with the requirements of 10 CFR 50.54(p).

DESCRIPTION OF REQUEST:

This proposed change is a request to revise the "Modified Amended Security Plan (Revision 2), Crystal River Nuclear Plant, Unit 3," dated November 10, 1978, with subsequent 10 CFR 50.54(p) changes. The proposed "Modified Amended Security Plan, Crystal River Nuclear Plant, Unit No. 3, (Revision 4), dated February 1, 1984, is deemed Safeguards information, as specified by 10 CFR 50.54(v) and 10 CFR 73.21, and is, therefore, withheld from public disclosure. This Plan was originally submitted to the NRC as a 10 CFR 50.90 license amendment request by letter, 3F-0981-27, dated September 1, 1981, and was designated as "Revision 3." The NRC Staff commented on Revision 3 of the Plan and Florida Power Corporation responded to the NRC Staff comments, and made several additional changes to the Plan, resubmitting it to the NRC by letter, 3F-0582-07, dated May 6, 1982, as Revision 4. In letters 3F-0383-16 and 3F-0383-10 dated January 20, 1983 and March 7, 1983, respectively, Florida Power Corporation responded to further NRC Staff comments and made further minor changes to the original submittal of Revision 4 of the Plan. The final submittal of the Revision 4 version of the Plan made some further changes to the Plan which do not decrease the safeguards effectiveness of the proposed Plan. These latter changes were made by Florida Power Corporation to incorporate recent changes in organization and operations, and to further refine the Plan editorially.

The most significant changes proposed in Revision 4 of the Modified Amended Security Plan are the following:

1. Revision 2 of the Modified Amended Security Plan has been completely revised using a format compatible with NUREG-0908, eliminating redundancy and extraneous detail.
2. Changes in the security management structure have been integrated into the appropriate sections of the Plan, and the applicable organization charts have been revised.

3. Procedures and documentation requirements relative to personnel screening and training in security practices have been revised.
4. The training and qualification requirements for Security Force Personnel have been revised to comply with the commitments of the Crystal River Unit 3 Security Training and Qualification Plan.
5. Provisions regarding equipment for Security Officers have been updated and revised.
6. The appropriate layout diagram and associated description in the Plan have been revised to reflect the new configuration and procedures for operation of the personnel access point.
7. The methods and frequency of security patrols have been upgraded and clarified.
8. Material found in the previous version of the Modified Amended Security Plan regarding the Owner-Controlled Area has been deleted since there is no NRC requirement regarding this portion of the site.
9. Layout drawings which show the location of Vital Areas and Vital Area access portals have been included.
10. Information clarifying physical structure and alarming of Vital Area barriers has been inserted in the Plan.
11. The listing of Vital Area doors has been updated.
12. Access authorization procedures for personnel, vehicles, and materials have been upgraded and revised.
13. Additional information regarding the Crystal River Unit 3 badge system has been added.
14. Escort ratios for personnel and requirements relating to the escorting of vehicles have been upgraded and revised.
15. Commitments for searches of personnel, vehicles, and material have been upgraded to conform to recent NRC guidance.
16. Requirements for vehicular access to Protected and Vital Areas have been upgraded and clarified.
17. Control procedures for vehicles required to enter the Protected Area have been updated and clarified.
18. Processing requirements for packages and materials have been revised. Exemptions from search have been itemized to comply with appropriate NRC guidance.

19. The control and accountability measures for keys, locks, and related equipment have been revised to comply with recent NRC guidelines.
20. Design and performance parameters for intrusion and detection equipment have been added to the Plan to indicate applicable compliance with Regulatory Guides 5.44 and 5.7.
21. Illumination commitments have been upgraded to comply with NRC guidelines. Physical protection measures for structures which are not illuminated, yet are accessible from ground level, have been described.
22. More detailed information regarding emergency power used for security equipment has been included.
23. The functioning of the CCTV camera system has been clarified.
24. Information relative to the staffing, equipment, and physical structure of the CAS and SAS has been updated.
25. Information relative to security communications has been consolidated and updated.
26. A chapter on response to safeguards contingencies has been added to update information in the previous version of the Plan. Requirements for reporting to the NRC in accordance with 10 CFR 73.71(b) and (c) have been added to the Plan.
27. Changes necessitated by recent construction activities have been added to the Plan. Revised layout drawings that reflect the configuration of the perimeter barrier, intrusion detection devices, and CCTV cameras have been added.
28. Chapter 10 reflects clarification of the commitments to 10 CFR 73.55(d)(8) relative to access controls during refueling outages and major maintenance operations. In addition, special procedures relative to vital equipment during emergencies or when the equipment is not required by the Technical Specifications have been added to this Chapter.
29. Procedures for testing security equipment and inspecting barriers have been updated and revised to reflect current NRC guidelines.
30. Information relative to commitments on security recordkeeping has been consolidated and revised to reflect current procedures in effect at Crystal River Unit 3 and NRC requirements.
31. A chapter on security audits has been inserted to commit to the requirements of 10 CFR 73.40(d) and 10 CFR 73.55(g)(4).
32. Terms and definitions have been inserted in the Plan to clarify the intent of terminology not defined in 10 CFR 73.2.
33. A list of acronyms has been inserted for ease of reference.

REASON FOR REQUEST:

The revision to the Physical Security Plan is written in a format compatible with the intent of NUREG-0908, "Acceptance Criteria for the Evaluation of Nuclear Power Reactor Security Plans," July 1982, and provides for more efficient security operations, as prescribed by 10 CFR 73.55.

EVALUATION OF REQUEST:

The entire Plan does not degrade safety nor affect the ability of Operators/Operations Personnel to respond to emergencies, in accordance with applicable guidance found in NUREG-0992.

Analysis of Significant Hazards Considerations

The changes proposed in Revision 4 to the Crystal River Nuclear Plant, Unit 3, Modified Amended Security Plan all fall within the following examples of amendments to the operating license which are cited as "not likely to involve significant hazards considerations" in the Statements of Consideration to 10 CFR 50.92, published in 48 Federal Register 14870, dated April 6, 1983:

- "(i) A purely administrative change to Technical Specifications (i.e., licensing planning document): for example, a change to achieve consistency throughout the Technical Specifications (i.e., Plan), correction of an error, or a change in nomenclature.
- (ii) A change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications (i.e., licensing planning document) . . .
- (vii) A change to make a license conform to changes in the regulations, where the licensing change results in very minor changes to facility operations clearly in keeping with the regulations."

A categorization of the significant changes listed in the preceding section by the examples cited above is provided below for ease of review:

<u>Example (i)</u>	<u>Example (ii)</u>	<u>Example (vii)</u>
1, 2, 8, 9, 10, 11, 13 22, 23, 24, 25, 32, and 33	3, 5, 6, 7, 12, 14 through 18, 27, and 28	4, 19, 20, 21, 26, 29, 30, and 31

Since all of the changes to the Plan cited are purely administrative changes; changes that constitute additional limitations, restrictions, or controls not presently included in the Plan; or are changes to make the license conform to changes in the regulations where the licensing change results in very minor changes to facility operations clearly in keeping with the regulations, the Plan does not involve a significant hazards consideration.

Safety Analysis

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change affects only the Modified Amended Security Plan and is not related to any accident previously evaluated. Generally, this change concerns administrative alterations and makes the licensee conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. Although some prior commitments have been decreased, the reductions are clearly within all applicable NRC acceptance criteria. In addition, many of the changes impose additional limitations, restrictions, or controls not previously submitted. Therefore, this comprehensive change, applied in its entirety, results in a more effective security program which does not decrease safeguards effectiveness.

2. Will operation of the facility in accordance with this proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes to the Plan do not alter any safety-related design bases of the facility or its operation. It, therefore, does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed changes to the Plan do not affect any margin of safety.

Safety and Significant Hazards Determination

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (see 48 Federal Register 14870) of actions involving no significant hazards considerations which include changes that are purely administrative; constitute an additional limitation, restriction, or control not presently included; and make a license conform to changes in the regulations, where the licensing change results in very minor changes to facility operations clearly in keeping with the regulations. Since the proposed changes all fall into these categories, Florida Power Corporation concludes that the application does not involve a significant hazards consideration. Furthermore, although Revision 4 of the Plan does reduce some commitments in the existing Plan, the resulting Plan will clearly meet applicable standards and criteria of the NRC for physical protection, and will not decrease safeguards effectiveness.

Based on the analysis presented above, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the plant on the environment as described in the NRC Environmental Statement.

ENCLOSURE 2

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
AND FEDERAL REGISTER NOTICE INPUT

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DOCKET NO.: 50-302

FACILITY: Crystal River Unit 3

LICENSEE : Florida Power Corporation

DATE OF APPLICATION:

Description of Amendment Request:

The proposed amendment would revise the Crystal River Unit 3 Modified Amended Security Plan, Revision 2, dated November 10, 1978. The proposed changes include: a complete revision of the Plan in a format compatible with NUREG-0908; changes in security management structure; revisions in procedures and documentation relative to personnel screening, access authorization, access controls at the personnel access point, badging, escorting, vehicular access and associated controls, processing of packages and materials, construction activities, and testing of security equipment and surveillance of barriers; revision of the training and qualification requirements for Security Force personnel to assure consistency with the Security Training and Qualification Plan; updated listings and drawings of Vital Areas and Vital Area portals; deletion of security requirements concerning the Owner-Controlled Area; revision of the methods and frequency of security patrols; upgrading of search requirements for personnel, vehicles, and material; revision of control and accountability measures for security keys, locks, and related equipment; clarification of performance parameters for intrusion and detection equipment; further detail on illumination, security emergency power, the CCTV system, alarm station operation, and security communications; upgrading of requirements to be in effect during refueling and major maintenance outages, consolidation of security reporting and recordkeeping requirements; and revision of security audit commitments as required by 10 CFR 73.40(d) and 10 CFR 73.55(g)(4). Pursuant to 10 CFR 73.21, these changes are withheld from public inspection.

Significant Hazards Consideration Determination:

- (x) Amendment involves no significant hazards considerations.
- () Amendment involves significant hazards considerations.

Basis for Proposed No Significant Hazards Consideration Determination:

The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of these Standards by providing certain examples (48 FR 14870). Three of these examples of guidance are: a purely administrative change to Technical Specifications; a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications; and a change to make a license conform to changes in the regulations, where the licensing change results in very minor changes to facility operations clearly in keeping with the regulations. The proposed changes all fall into one of these categories. Administrative changes do not lend themselves to a significant hazards consideration based on the proposed amendment because the changes result in very minor changes to facility operations. Other changes are proposed to make the license conform to changes in the regulations since the initial submittal and approval of the Plan, and add requirements to ensure compliance with regulations. Still other

changes impose additional limitations, restrictions, or controls not previously submitted that improve safeguards effectiveness of the facility. Although some prior commitments have decreased in the proposed amendment, these reductions have been instituted to conform to more recent Commission guidelines and are clearly within all applicable Commission acceptance criteria.

Furthermore, this comprehensive change, applied in its entirety, results in a more effective security program which does not decrease safeguards effectiveness. The proposed changes do not affect reactor operations or accident analyses and have no radiological consequences. Therefore, operation in accordance with the proposed amendment clearly involves no significant hazards consideration because the changes will not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

Requested Implementation Date: