



ADP CR3, LLC

Crystal River Nuclear Plant  
2760 South Falkenburg Rd  
Riverview FL, 33578  
Docket 72-1035  
Docket 50-302  
Operating License No. DPR-72

10 CFR 50.90

March 17, 2021  
3F0321-02

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

50-302  
72-1035

Subject: Crystal River Unit 3 – License Amendment Request, Revision 0,  
ISFSI Security Plan, Revision A.

References:

1. NRC to CR3 – NRC issued Amendment No. 256 to Facility License No. DPR-72 for CR3. That amendment revised the CR3 license to approve the Security ISFSI Only Security Plan, Revision 0, dated February 14, 2018. (ADAMS Accession No. ML18017A948)
2. CR3 to NRC – CR3 revised the ISFSI Security Plan, in accordance with 50.54(p) to make it consistent with the NRC approved partial site release. On June 5, 2018, CR3 sent the NRC a copy of the revised plan, revision 1. (ADAMS Accession No. ML18166A173)
3. CR3 to NRC – CR3 revised the ISFSI Security Plan, in accordance with 50.54(p) to make it consistent with the NRC approved license transfer. On July 28, 2020, CR3 sent the NRC a copy of the revised plan, revision 2. (ADAMS Accession No. ML20220A423)

Dear Sir:

Pursuant to 10 CFR 50.90, ADP CR3, LLC (ADP CR3), hereby requests a license amendment pertaining to the Crystal River Nuclear Plant Unit 3 (CR3) ISFSI Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and a proposed revision to the existing Physical Security license condition in the facility operating license. Specifically, ADP CR3 is requesting approval of the revised ISFSI Security Plan and the associated amendment to the CR3 Facility Operating License (No. DPR-72), to revise the Physical Security license condition 2.D as it relates to the revised Security Plan. In addition, updated order responses to Additional Security Measures (ASM) and Fingerprinting for Unescorted Access at the CR3 ISFSI are attached to this submittal as Enclosure 5.

By letter dated February 14, 2018 the NRC issued CR3 License Amendment 256, which approved revision 0 of the ISFSI Security Plan (Reference 1).

SDDI  
NMSSZ6

NRA  
NMSS

NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "SECURITY-RELATED INFORMATION", AND  
ENCLOSURES 3, 4, and 5 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION."  
THIS INFORMATION MUST BE PROTECTED ACCORDINGLY.  
UPON SEPARATION OF THESE ENCLOSURES, THIS LETTER IS "DECONTROLLED."

In accordance with 10 CFR 50.54(p), CR3 revised the ISFSI Security Plan, Security Training and Qualification Plan, and Safeguards Contingency Plan to Revision 1 to reflect the NRC approved partial site release. An evaluation of the plan revision, in accordance with 10 CFR 50.54(p)(2), has determined that the incorporated changes do not reduce the effectiveness of the plan and that the plan continues to meet the standards of 10 CFR 72.212(b)(9). (Reference 2)

In accordance with 10 CFR 50.54(p), CR3 revised the ISFSI Security Plan, Security Training and Qualification Plan, and Safeguards Contingency Plan to Revision 2 to reflect the NRC approved license transfer to ADP CR3, LLC. An evaluation of the plan revision, in accordance with 10 CFR 50.54(p)(2), has determined that the incorporated changes do not reduce the effectiveness of the plan and that the plan continues to meet the standards of 10 CFR 72.212(b)(9). (Reference 3)

The ISFSI Only Security Plan addresses the protection of fuel on site that is licensed by the CR3 Operating License. The Security Plan reflects the configuration of CR3 that all the spent nuclear fuel is stored at the ISFSI. The 10 CFR Part 50 license for CR3 no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. Also based CR3 Permanently Defueled Technical Specifications (PDTs), CR3 is no longer allowed to place spent nuclear fuel back into the spent fuel pools.

An evaluation of this proposed license amendment 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 involve no significant hazards consideration. The bases for these determinations are included in Enclosure 2. The ISFSI Security Plan with attached alternate measures is provided in Enclosure 3. Enclosure 4 contains the assumptions used in developing the ISFSI Security Plan. Updated order responses to ASM responses for the CR3 ISFSI are attached to this submittal as Enclosure 5. A marked-up and redline version of the facility operating license pages for the Physical Security license condition, reflecting the 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.

ADP CR3 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, ADP CR3 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 information.

A copy of this submittal has been provided to the State of Florida In accordance with 10 CFR 50.91(b).

NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "SECURITY-RELATED INFORMATION", AND  
ENCLOSURES 3, 4, and 5 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION."  
THIS INFORMATION MUST BE PROTECTED ACCORDINGLY.  
UPON SEPARATION OF THESE ENCLOSURES, THIS LETTER IS "DECONTROLLED."

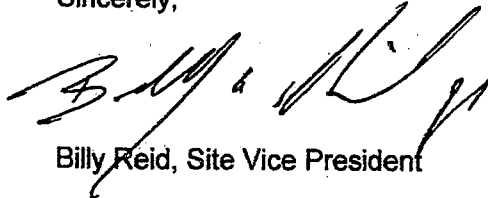
There are no new regulatory commitments made within this submittal.

ADP CR3 requests approval of this ISFSI Security Plan license amendment request by January 2022. Once approved, the Amendment will be implemented within 60 days.

If you have any questions regarding this submittal, please contact Mr. Mark Van Sicklen, Licensing Manager, at (352) 224-1200, ext. 2901.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 17, 2021.

Sincerely,



Billy Reid, Site Vice President

BR/mvs

Enclosures:

1. Evaluation of Proposed Changes (Security-Related Information)
2. No Significant Hazards Consideration and Environmental Assessment (Uncontrolled)
3. ADP CR3, LLC - Crystal River Unit 3 Independent Spent Fuel Storage Installation Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (includes Alternative Measures) (Safeguards Information)
4. Programmatic Assumptions for ISFSI Only Sites (Safeguards Information)
5. Updated compliance (ISFSI-Only) ASM responses (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  
Regional Administrator, Region I  
State of Florida (Uncontrolled Enclosures ONLY, No SGI or SRI material)

NOTE: ENCLOSURE 1 TO THIS LETTER CONTAINS "SECURITY-RELATED INFORMATION", AND ENCLOSURES 3, 4, and 5 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION."  
THIS INFORMATION MUST BE PROTECTED ACCORDINGLY.  
UPON SEPARATION OF THESE ENCLOSURES, THIS LETTER IS "DECONTROLLED."

**ADP CR3, LLC**

**DOCKET NUMBERS 72-1035 and 50-302 /  
LICENSE NUMBER DPR-72**

**ENCLOSURE 2**

**No Significant Hazards Consideration  
and Environmental Assessment  
(Uncontrolled)**

## **No Significant Hazards Consideration and Environmental Assessment (Uncontrolled)**

### **1. REGULATORY EVALUATION**

#### **1.1 Applicable Regulatory Requirements/Criteria**

10 CFR 73.55 requires licensees to maintain and implement a Commission-approved Security Plan, Training and Qualification Plan and Safeguards Contingency Plan. 10 CFR 72.212(b)(9) requires licensees to comply with 10 CFR 73.55, with six (6) additional conditions and exceptions for general licensed ISFSIs under 10 CFR 72.210. The Crystal River Nuclear Plant Unit 3 (CR3) Facility Operating License (No. DPR-72), includes a Physical Security license condition (2.D) that requires the respective licensees to fully implement and maintain in effect all provisions of the Commission-approved Physical Security Protection Plans, including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p).

#### **1.2 No Significant Hazards Consideration Determination**

ADP CR3, LLC (ADP CR3) is requesting approval of the revised Security Plan and the amendment to the Crystal River Unit 3 (CR3) Facility Operating License (No. DPR-72) to revise the Physical Security license condition 2.D as it relates to the revised Security Plan. The ADP CR3 combined Independent Spent Fuel Storage Installation (ISFSI) Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan addresses the protection of fuel on site that is licensed by the CR3 Operating License. The ISFSI Security Plan reflects the configuration of CR3 that all the spent nuclear fuel is stored at the ISFSI. The 10 CFR Part 50 license for CR3 no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. Also based on the CR3 PDTs Technical Specifications, CR3 is no longer allowed to place Spent Nuclear Fuel back into the Spent Fuel Pools.

ADP CR3 has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment would modify the CR3 facility operating license condition by revising the ISFSI Security Plan. Occurrence of postulated accidents associated with the Part 50 plant, currently undergoing demolition, is no longer credible since all spent fuel pool has been permanently removed from the plant and CR3 PDTs Technical Specifications prevent fuel from being stored outside the ISFSI. The UFSAR for NUHOMS Certificate of Compliance (CoC) 1004 states most accidents are not credible and the accident analysis demonstrates that none of the hypothetical accidents analyzed has any consequential effect on the public. Many of the analyzed events, like a fire at

the ISFSI, have no radiological release. The proposed amendment has no effect on the capability of any ISFSI System, Structure, or Components (SSC) to perform its design function. The proposed amendment would not increase the likelihood of the malfunction of any ISFSI SSC as there are no hardware or software modifications associated with this change. The proposed amendment would have no effect on any of the previously evaluated accidents in the ISFSI UFSAR for CoC 1004.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed amendment does not involve significant physical alteration of the plant. Minor modifications are associated with this proposed amendment (e.g., wiring changes in security equipment, the addition of telecommunications equipment, and software changes to the security computer system.) The proposed license amendment would not physically change any SSCs involved in the mitigation of any postulated accident. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed amendment does not create the possibility of a new failure mode associated with any equipment or personnel failures. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Plant safety margins are established through limiting conditions for operation and safety analysis described in the DSAR. Because the 10 CFR Part 50 license for CR3 no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel or spent fuel pools the occurrence of postulated accidents associated with reactor operation is no longer credible. The proposed amendment does not involve a change in the plant's design, configuration, or operation. The modifications associated with this proposed amendment does not affect plant safety or design margins. Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, CR3 concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

### **1.3 Conclusions**

In conclusion, based on the considerations discussed above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

## **2. ENVIRONMENTAL CONSIDERATION**

CR3 has evaluated this proposed license amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. CR3 has determined that this proposed license amendment meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(12). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 and relates solely to safeguards matters (i.e., protection against sabotage or loss or diversion of special nuclear material). This amendment is confined to (i) Organizational and procedural matters; (ii) Modifications to systems used for security and/or materials accountability; and (iii) Administrative changes. The proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(12) and does not involve any significant construction impacts. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

**ADP CR3, LLC**

**DOCKET NUMBERS 72-1035 and 50-302 /  
LICENSE NUMBER DPR-72**

**ENCLOSURE 6**

**Facility Operating License  
Strikeout Pages  
(Uncontrolled)**





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

ADP CR3, LLC

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 50-302

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 258XXX  
License No. DPR-72

1. The Nuclear Regulatory Commission (the Commission) having found that:
  - A. The application for amendment by Duke Energy Florida, LLC (herein "DEF") (the owner), dated June 14, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter 1; the NRC subsequently approved the transfer of licensed responsibility for the Crystal River Unit 3 Nuclear Generating Plant (herein "the facility" or "CR3") to ADP CR3, LLC (herein "ADP CR3"), on October 1, 2020;
  - B. Construction of CR3 has been substantially completed in conformity with Provisional Construction Permit No. CPPR-51 and the application, as amended, the provisions of the Act and the rules and regulations of the Commission;
  - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;
  - E. ADP CR3 is technically qualified and financially qualified to engage in the activities authorized by this operating license in accordance with the rules and regulations of the Commission;
  - F. DEF has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
  - G. The issuance of this operating license will not be inimical to the common defense and security or to the health and safety of the public;

Facility Operating License No. DPR-72  
Amendment No. 258XXX

(20) ADP CR3 must ensure that:

The NorthStar Group Services, Inc. (NorthStar) Member Representative of Accelerated Decommissioning Partners, LLC (ADP) (NorthStar Member Representative) has the responsibility and exclusive authority to ensure and shall ensure that the business and activities of ADP CR3 and ADP SF1 with respect to the CR3 license is at all times conducted in a manner consistent with the public health and safety, and common defense and security of the United States.

The NorthStar Member Representative, and any Chief Executive Officer (CEO) or Chief Nuclear Officer (CNO) of ADP or ADP CR3 appointed by NorthStar to serve in such office, shall be a U.S. citizen.

The licensees shall not approve or take any action involving matters necessary to ensure U.S. control without the approval of NorthStar. This includes any matters relating to nuclear safety, security, or reliability, the appointment of any CEO and CNO, and any successor thereof, or any other issue reasonably determined by NorthStar in its prudent exercise of discretion.

Changes to the ADP CR3, LLC Negation Action Plan may only be made upon recommendation of ADP CR3's CEO and approval by NorthStar. Any proposed change resulting in a decrease in the effectiveness of the plan will not be implemented without prior NRC approval. ADP CR3 will provide the NRC with 30 days prior written notice before the implementation of any material changes to the negation measures in the Limited Liability Agreement of Accelerated Decommissioning Partners, LLC dated February 7, 2017 (ADP LLC Agreement).

If at any time NorthStar is not required to have exclusive authority to approve any of the actions in Section 11.4(a) of the ADP LLC Agreement, any amendments to Section 11.4(a) must comply with applicable law, including Foreign Ownership, Control, or Domination requirements, and must be approved by the NRC.

D. Physical Security

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Independent Spent Fuel Storage Installation Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan", Revision 03, submitted by letter dated ~~July 5, 2017~~ March 17, 2021.

E. Deleted per Amendment No. 247

**ADP CR3, LLC**

**DOCKET NUMBERS 72-1035 and 50-302 /  
LICENSE NUMBER DPR-72**

**ENCLOSURE 7**

**Facility Operating License  
Revision Bar Pages**

**(Uncontrolled)**



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

ADP CR3, LLC

DUKE ENERGY FLORIDA, LLC

DOCKET NO. 50-302

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. XXX  
License No. DPR-72

1. The Nuclear Regulatory Commission (the Commission) having found that:
  - A. The application for amendment by Duke Energy Florida, LLC (herein "DEF") (the owner), dated June 14, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter 1; the NRC subsequently approved the transfer of licensed responsibility for the Crystal River Unit 3 Nuclear Generating Plant (herein "the facility" or "CR3") to ADP CR3, LLC (herein "ADP CR3"), on October 1, 2020;
  - B. Construction of CR3 has been substantially completed in conformity with Provisional Construction Permit No. CPPR-51 and the application, as amended, the provisions of the Act and the rules and regulations of the Commission;
  - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
  - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;
  - E. ADP CR3 is technically qualified and financially qualified to engage in the activities authorized by this operating license in accordance with the rules and regulations of the Commission;
  - F. DEF has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
  - G. The issuance of this operating license will not be inimical to the common defense and security or to the health and safety of the public;

Facility Operating License No. DPR-72  
Amendment No. XXX

(20) ADP CR3 must ensure that:

The NorthStar Group Services, Inc. (NorthStar) Member Representative of Accelerated Decommissioning Partners, LLC (ADP) (NorthStar Member Representative) has the responsibility and exclusive authority to ensure and shall ensure that the business and activities of ADP CR3 and ADP SF1 with respect to the CR3 license is at all times conducted in a manner consistent with the public health and safety, and common defense and security of the United States.

The NorthStar Member Representative, and any Chief Executive Officer (CEO) or Chief Nuclear Officer (CNO) of ADP or ADP CR3 appointed by NorthStar to serve in such office, shall be a U.S. citizen.

The licensees shall not approve or take any action involving matters necessary to ensure U.S. control without the approval of NorthStar. This includes any matters relating to nuclear safety, security, or reliability, the appointment of any CEO and CNO, and any successor thereof, or any other issue reasonably determined by NorthStar in its prudent exercise of discretion.

Changes to the ADP CR3, LLC Negotiation Action Plan may only be made upon recommendation of ADP CR3's CEO and approval by NorthStar. Any proposed change resulting in a decrease in the effectiveness of the plan will not be implemented without prior NRC approval. ADP CR3 will provide the NRC with 30 days prior written notice before the implementation of any material changes to the negotiation measures in the Limited Liability Agreement of Accelerated Decommissioning Partners, LLC dated February 7, 2017 (ADP LLC Agreement).

If at any time NorthStar is not required to have exclusive authority to approve any of the actions in Section 11.4(a) of the ADP LLC Agreement, any amendments to Section 11.4(a) must comply with applicable law, including Foreign Ownership, Control, or Domination requirements, and must be approved by the NRC.

D. Physical Security

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Independent Spent Fuel Storage Installation Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan", Revision 3, submitted by letter dated March 17, 2021.

E. Deleted per Amendment No. 247

**ADP CR3, LLC**

**DOCKET NUMBERS 72-1035 and 50-302 /  
LICENSE NUMBER DPR-72**

**ENCLOSURE 8**

**Evaluation of Proposed Changes  
(REDACTED)**

## EVALUATION OF PROPOSED CHANGES

### 1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, ADP CR3, LLC (ADP CR3), hereby requests a license amendment pertaining to the Crystal River Nuclear Plant Unit 3 (CR3) ISFSI Security Plan, Training and Qualification Plan, Safeguards Contingency Plan with attached alternative measures, and a proposed revision to the existing Physical Security license condition in the facility operating license. Specifically, ADP CR3 is requesting approval of the revised ISFSI Security Plan and the associated amendment to the CR3 Facility Operating License (No. DPR-72), to revise the Physical Security license condition 2.D as it relates to the revised Security Plan. In addition, updated order responses to Additional Security Measures (ASM) and Fingerprinting for Unescorted Access at the CR3 ISFSI are attached to this submittal as Enclosure 5.

### 2.0 DETAILED DESCRIPTION

The ISFSI Security Plan addresses the protection of fuel on site that is licensed by the CR3 Operating License. The Security Plan reflects the configuration of CR3 that all the spent nuclear fuel is stored at the ISFSI. The 10 CFR Part 50 license for CR3 no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. CR3 Permanently Defueled Technical Specifications (PDTS), CR3 is no longer allowed to place spent nuclear fuel back into the spent fuel pools..

The ISFSI Security Plan will supersede the current ISFSI Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan at CR3. The new plan addresses the [REDACTED], and other minor changes.

By letter dated February 24, 2016, CR3 was issued orders to provide Additional Security Measures (ASM) and Fingerprinting for Unescorted Access at the CR3 ISFSI. By letter dated February 20, 2017, CR3 responded to the orders how compliance was met for the current approved Security Plan. Changes were made to the compliance ASM responses, therefore updated responses are attached to this submittal (Enclosure 5).

A technical evaluation of this proposed license amendment is provided below. The proposed changes have also 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 involve no significant hazards consideration. The bases for these determinations are included in Enclosure 2. The ISFSI Security Plan with attached alternative measures is provided in Enclosure 3. Enclosure 4 contains the assumptions used in developing the ISFSI Security Plan. Updated order responses to ASM responses for the CR3 ISFSI are attached to this submittal as Enclosure 5. A marked-up and redline version of the facility operating license pages for the Physical Security license condition, reflecting the 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.

ADP CR3 requests approval of this ISFSI Security Plan license amendment request by January 2022. Once approved, the Amendment will be implemented within 60 days.

### 3.0 TECHNICAL EVALUATION

The proposed ISFSI Security Plan will supersede the current ISFSI Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan at CR3. The new ISFSI Security Plan addresses the replacement of the current Secondary Alarm Station (SAS) with remote monitoring,

[REDACTED] and other minor changes. The security functions for an ISFSI are to detect threats, assess those threats and call for assistance from the Local Law Enforcement Agency (LLEA). The changes addressed in this new ISFSI Security Plan do offer a different approach to meeting these requirements, however, the effectiveness of the security program remains unchanged.

10 CFR 72.212(b)(9) requires licensees to comply with 10 CFR 73.55, with six (6) additional conditions and exceptions. The currently approved ISFSI Security Plan was developed when CR3 was part of the Duke Energy fleet and was based on the NRC endorsed template for Operating Nuclear Plants, NEI 03-12 Revision 7, as modified to incorporate the six (6) additional conditions and exceptions.

In addition, other requirements contained in the current ISFSI Security Plan are no longer applicable since all fuel is now stored in the ISFSI Facility, including certain sections of the design basis threat, target sets, 10 CFR 26, and portions of the insider mitigation program. Therefore, these requirements are not included in the proposed revision to the ISFSI Security Plan. Programmatic assumptions used to develop this revision to the ISFSI Security Plan are discussed in Enclosure 4.



Pursuant to 10 CFR 73.55(r), 8 (eight) alternative measures have been incorporated into the ISFSI Security Plan. These alternative measures address [REDACTED]

CR3 has taken a methodical approach to integrating 10 CFR 72.212(b)(9) requirements with various other Code of Federal Regulation requirements. The ISFSI Security Plan and alternative measures complies with these requirements. The ISFSI Security Plan protects against the applicable sections of the design basis threat of radiological sabotage and ensures the health and safety of the public.