

~~SAFEGUARDS INFORMATION PURSUANT TO 10 CFR 73.21~~

~~Security-Related Information — Withhold from Public Disclosure pursuant to 10 CFR 2.390~~

When separated from both Safeguards Information enclosures and Security-Related Information enclosures, this document is decontrolled provided the transmittal document does not otherwise warrant protection from unauthorized disclosure.



**HITACHI**

**GE Hitachi Nuclear Energy**

**Matt Feyrer**

Site Manager, Vallecitos Nuclear Center

6705 Vallecitos Rd.  
Sunol CA 94586  
USA

T (910) 233-6121  
matt.feyrer@ge.com

M210160

December 16, 2021

Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Subject: GEH Revised VNC Site Physical Security Plan (PSP)

References: 1) NRC License R-33, Docket 05000073  
2) NRC License SNM-960, Docket 07000754  
3) NRC Confirmatory Order EA-14-144, April 22, 2015  
4) Letter M.J. Feyrer (GEH) to Director, Office of Nuclear Safety and Safeguards, GEH Revised VNC Site Physical Security Plan (PSP), March 20, 2019

GE Hitachi Nuclear Energy Americas LLC (GEH) hereby submits a revised Vallecitos Nuclear Center (VNC) Site Physical Security Plan dated December 10, 2021, pursuant to 10 CFR 50.54 and 10 CFR 70.32. This revision replaces in its entirety the previous plan dated March 20, 2019.

Enclosure 1 consists of the revised VNC Site PSP. It has been completely rewritten and reformatted to generally align with the guidance provided in Regulatory Guide 5.59, Standard Format and Content for a Licensee Physical Security Plan for the Protection of Special Nuclear Material of Moderate or Low Strategic Significance. A comparison table has been included in Enclosure 3 to itemize substantive changes. Bounding and clarity has been enhanced throughout by cross-referencing each requirement in the PSP to its basis (i.e., regulation, license, NRC Order). This information is provided in tabular form in Enclosure 2.

Enclosure 2 provides descriptions and evaluations of changes to the plan pursuant to 10 CFR 50.54(p)(2) and 10 CFR 70.32(e). GEH Internal review has concluded that some changes in this PSP revision constitute marginally reduction in effectiveness (RIE) of the PSP and are being submitted for NRC prior approval. RIE changes have been evaluated in Enclosure 3.


Enclosures 1, and 3 contain Safeguards Information which GEH requests be withheld from public disclosure pursuant to 10 CFR 2.390 and 73.21.

Enclosure 2 contains security-sensitive information which GEH requests be withheld from public disclosure pursuant to 10 CFR 2.390 and NRC RIS 2005-31.

This letter is being submitted under oath or affirmation according to RIS 01-018. Upon removal of Enclosures 1, 2, and 3, this transmittal letter may be decontrolled.

If you have any questions regarding this matter, please contact me at (925) 918-6018.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

  
\_\_\_\_\_  
Signature

12/16/2021  
\_\_\_\_\_  
Executed On (Date)

Matt Feyrer, Site Manager  
Vallecitos Nuclear Center

- Enclosures: 1) Revised VNC Site Physical Security Plan, December 10, 2021 (*Safeguards Information*)
- 2) VNC Physical Security Plan 10 CFR 50.54(p) Change Evaluation (Security-Sensitive Information)
- Attachment 1 – VNC Physical Security Plan Regulatory Basis
    - Table 1 Regulatory Matrix
    - Table 2 NRC Order Disposition
- 3) 10 CFR 50.54(p) Continuing Change Evaluation (*Safeguards Information*)
- Attachment 2 – Comparison Table
  - Attachment 3 – Reduction in Effectiveness Evaluations

cc: NRC Region IV Administrator, Arlington, TX  
D. Hardesty, NRC NRR/DANU/UNPL (w/o enclosures)  
O. Siurano-Perez, NRC NMSS/DFM/FFLB (w/o enclosures)  
J. Zimmerman, NRC NMSS/DFM/FFLB (w/o enclosures)

MJF 21-010