

November 6, 2007

MEMORANDUM TO: Michael Gartman, Chief  
ESBWR/ABWR Projects, Branch 2  
Division of New Reactor Licensing  
Office of New Reactors

FROM: Doug Huyck, Chief /RA/  
Reactor Security Licensing and Programs Branch  
Division of Security Policy  
Office of Nuclear Security and Incident Response

SUBJECT: ACCEPTANCE REVIEW RESULTS FOR THE SOUTH TEXAS UNITS  
3 AND 4 COMBINED LICENSE APPLICATION (TAC NOS. RA0177,  
RA0178)

Reactor Security Licensing and Programs Branch (RSLPB) has completed its acceptance review of the South Texas Units 3 & 4 Combined License application (COLA) submitted by South Texas Project (STP). This review covered the following COLA Final Safety Analysis Report (FSAR) sections for which RSLPB has primary review responsibilities and in addition, applicable interface documentation referenced in the FSAR:

- FSAR Section 13.6, Physical Security; Section 13.7, Fitness for Duty; Section 14.3S Physical Security Hardware Inspections, Tests, Analyses and Acceptance Criteria (ITAAC).
- Referenced documentation
  - Reactor Design Advance Boiling Water Reactor (ABWR) Design Control Document (DCD) Tier 2, Revision 4, Section 13.6, Physical Security (NUREG – 1503)

Completeness and Sufficiency

Based on this review, I conclude that the application contains the information required by regulations. However, there are significant gaps in the submitted information that preclude the conduct of an effective and efficient technical review and, therefore, I cannot provide the specific review schedule time. RSLPB cannot complete the STP units 3 & 4 COLA detailed technical review without the information identified in Enclosures 1 and 2.

The significant technical deficiencies are as follows:

1. Section 13.6, Physical Security
2. Section 13.7 Fitness For Duty

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Schedule

The estimated effort for the detailed technical review of the following STP units 3 & 4 COLA SRP Sections by RSLPB varies materially from the pre-baseline model in the EPM.

I am requesting additional time and a delayed start for the review of Section 13.6, Physical Security because the applicant has not provided an exact time for providing the staff with the additional information to address the technical deficiencies identified during the acceptance review. Section 13.7, Fitness for Duty was not factored into the initial pre-baseline schedule. For each section, I have provided an updated resource plan for these tasks in Enclosure 4. The resource plan includes the new estimated level of effort, the resource(s) assigned, and the expected start date (or predecessor task that controls the start date e.g., application accepted milestone). Revisions to the resource plans have been submitted for the following FSAR Section reviews:

- FSAR Section 13.6 Physical Security
- FSAR Section 13.7 Fitness For Duty

Review Dependencies

RSLPB's detailed technical review of the STP units 3 & 4 COLA is independent of other ongoing application reviews by the staff.

- Enclosure:
1. Table 1 of the Safety Analysis Report Review Guide (section 13.6, Physical Security)
  2. Table 1 of the Safety Analysis Report Review Guide (section 13.7, Fitness for Duty)
  3. Table 1 of the Safety Analysis Report Review Guide (section 14.3.12, Physical Security Hardware Inspections, Tests, Analyses, Acceptance Criteria (ITAAC))
  4. Table 2 RSLPB Resource Plan Revisions for South Texas ABWR

CONTACT: Doug Huyck, Chief, NSIR/RSLPB  
301-415-5992.

M. Gartman

-3-

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ADAMS Accession Number:

ML073100812-Package /ML073100813-Memorandum /ML073100820-Enclosure 1  
ML073100826-Enclosure 2 /ML073100831-Enclosure 3 /ML073100834-Enclosure 4

OFC	DSP/RSLPB	BC: RSLPB
NAME	V. Williams	D. Huyck
DATE	11/6/07	11/6/07

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**Table 1: Safety Analysis Report Acceptance Review Results for STP ABWR COL**

SER Section: 13.6

Technical Branch: RSLPB (Primary) Technical Reviewer: Out of Scope

Branch Chief: D. Huyck

SRP Section: 13.6

Date: 11/6/07

Does the section address the applicable regulations: Yes

Are there any technical deficiencies, changes in planning assumptions, or dependencies on concurrent reviews? Yes Identify specific review area/topic in table below.

1. Review Area/Topic*	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews		
	2. Does COL section address the items required by regulation (refer to RG 1.206, Section C.IV.1)? (Yes/No)	3. Is COL section technically sufficient for this review area/topic? (yes/no)**	4. Can the technical deficiency be resolved through the RAI process? (yes/no)***	5. If no, for either completeness or technical sufficiency, identify deficiency(ies). This information will be needed for technical review.	6. Is the identified technical deficiency related to a risk-significant SSC? (yes/no)****	7. Are the pre-baseline review schedule and estimated staff-hours appropriate? (yes/no)	8. For each no, identify the change (or basis for change).	9. Identify the total review time in staff-hours*****	10. Can the review of the area/topic be completed without the completion of a concurrent review? (yes/no)	11. For each no, identify which application (DCD or COLA) and section.
13.6 Physical Security Plan	Yes	No	Yes	Information listed below in applicable area.	No	Yes	N/A		Yes	N/A
Facility Layout	Yes	No	Yes	Map that displays PA for proposed facility	No	No	Applicant is providing additional information		Yes	N/A
Performance Objectives	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Performance Evaluation Program	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Establishment of Security Organization	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Qualification for Employment in Security	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A

Physical Barriers	Yes	No	Yes	Map that identifies proposed facility's VBS	No	Yes	Applicant is providing additional information	N/A	Yes	N/A
Security Posts	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Keys, Locks, and Combinations	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Access Requirements	Yes	No	Yes	VA equipment within a vital area	No	No	Applicant is providing additional information	Out of Scope		N/A
Assessment and Detection Aids	Yes	yes	Yes	N/A	No	Yes	N/A			N/A
Communications	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Review, Evaluation and Audit of the Security Program	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Response Requirements	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
Special Situations Affecting Security	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Testing and Maintenance	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Compensatory Measures	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Records	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Digital Systems Security	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Temporary Suspension of Safeguards Measures	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
COL Action Item 13.6.2-1	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
COL Action Item 13.6.2-2.	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
^ COL Action Item 13.6.3-1	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
^ COL Action Item 13.6.3.3-2.	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A

^ COL Action Item 13.6.3.3-3.	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
^ COL Action Item 13.6.3.5-1	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
^ COL Action Item 13.6.3.5-2.	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
^ COL Action Item 13.6.3.3-1.	Yes	yes	Yes	N/A	No	Yes	N/A	N/A	Yes	N/A
<b>T &amp; Q Training Plan</b>										
Introduction	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Employment Suitability and Qualification	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Individual Trng. And Qualification	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Initial Training and Qualification	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Continuing Qualification	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Team Training	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Critical Task Matrix	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
SCP Background Information	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Generic Planning Base	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Response Capabilities	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Defense in Depth	Yes	Yes	Yes	N/A	No	Yes	N/A	N/A	yes	N/A
Implementation Schedule for Security Operational Programs	Yes	Yes	Yes	N/A	No	Yes	N/A	Out of Scope	Yes	N/A

^ Applicant is addressing COL action items within the site-specific security plans (Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan)

\*Review Area/Topic: Item identified in RG 1.206 or the regulations; for a COLA referencing a DC, this includes COL information items and departures from the design certification.

\*\*Technical Sufficiency: The application is compared against the SRP acceptance criteria. Note: New safety features, alternate regulatory compliance approaches, and/or deviations from DCs, should not be treated as deficiencies and factored into the basis for rejecting the application, unless staff determines that there is insufficient technical information associated with the respective item. These items are factored into confirmation of planning assumptions.

\*\*\*Significant deficiencies are those review area/topic which impact the staff's ability to begin the detailed technical review or complete its review within a predictable timeframe.

\*\*\*\*DSRA will provide risk significance information at time of review, if available.

\*\*\*\*\*Identification of new review time is on a FSAR section basis and consistent with the review phases within the EPM. Changes from the pre-baseline review schedule and estimated hours should be on that basis.

I. Attachment C: Table 1: Safety Analysis Report Acceptance Review Results for STP ABWR COL

SER Section: 13.7 Technical Branch: RSLPB (Primary) Technical Reviewer: Out of Scope  
 Branch Chief: D. Huyck SRP Section: N/A Date: Out of Scope

Does the section address the applicable regulations: Yes

Are there any technical deficiencies, changes in planning assumptions, or dependencies on concurrent reviews? Yes, Identify specific review area/topic in table below.

1. Review Area/Topic*	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule			Review Dependencies Among Concurrent Reviews		
	2. Does COL section address the items required by regulation (refer to RG 1.206, Section C.IV.1)? (Yes/No)	3. Is COL section technically sufficient for this review area/topic? (yes/no)**	4. Can the technical deficiency be resolved through the RAI process? (yes/no)***	5. If no, for either completeness or technical sufficiency, identify deficiency(ies). This information will be needed for technical review.	6. Is the identified technical deficiency related to a risk-significant SSC)? (yes/no)****	7. Are the pre-baseline review schedule and estimated staff-hours appropriate? (yes/no)	8. For each no, identify the change (or basis for change).	9. Identify the total review time in staff-hours*****	10. Can the review of the area/topic be completed without the completion of a concurrent review? (yes/no)	11. For each no, identify which application (DCD or COLA) and section.
FSAR 13.7 Fitness For Duty Description	Yes	No	Yes	Detailed description of the Fitness for Duty and its implementation to meet the current Part 26 requirements (ML072270296)	No	No	N/A	<span style="border: 1px solid black; padding: 2px;">Out of Scope</span>	Yes	N/A

\*Review Area/Topic: Item identified in RG 1.206 or the regulations; for a COLA referencing a DC, this includes COL information items and departures from the design certification.

\*\*Technical Sufficiency: The application is compared against the SRP acceptance criteria. Note: New safety features, alternate regulatory compliance approaches, and/or deviations from DCs, should not be treated as deficiencies and factored into the basis for rejecting the application, unless staff determines that there is insufficient technical information associated with the respective item. These items are factored into confirmation of planning assumptions.

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**Table 2: Reactor Security Licensing and Programs Resource Plan Revisions for  
STP ABWR COL**  
(Suggested Format)

Task Changes						Resource Changes		
SER Section No.	SER Section Title	Task *	Concurrent Dependent Review Activity **	Revised Start Date	Revised Finish Date	Name of Resource	Change Type ***	Revised Hours
13.7	Fitness – For – Duty	PSER and RAIs	N/A	1/7/08	3/6/08	Out of Scope	New	Out of Scope
13.7	Fitness – For – Duty	SER w/OI	N/A	7/7/08	8/1/08		New	

This template is to be used to facilitate management of revised planning data resulting from application acceptance reviews. Changes in planning data resulting from acceptance reviews may include identifying dependencies to concurrent activities in other projects, new or deleted tasks, or revisions to task durations, staffing, labor estimates, or start/finish dates.

\* Specify the task being revised: SER Phase 1 – PSER and RAIs Prepared  
SER Phase 2 – Evaluation Completed  
Other – Give task name  
Indicate if this task or SER section is new (not yet in the schedule).

\*\* Concurrent Dependent Review Activity: Identify, if any, the project and activity that precedes the affected task in this schedule (e.g., Task in a design certification review that precedes a COL review).

\*\*\* Change Type indicates how the resource is being changed:  
Revised – For an existing task, if a currently assigned resource is staying the same, but the hours or dates are being changed.  
New – For an existing task or a new task, if a new resource is being added to the task.  
Deleted – For an existing task and a currently assigned resource, if the resource is being removed from the task.

**Table 1: Safety Analysis Report Acceptance Review Results for STP A PWP COL**

SER Section: 14.3.12 Technical Branch: RSLPB (Primary) Technical Reviewer:   
 Branch Chief: D. Huyck SRP Section: N/A Date: 11/16/07

Does the section address the applicable regulations: Yes  
 Are there any technical deficiencies, changes in planning assumptions, or dependencies on concurrent reviews? Yes, Identify specific review area/topic in table below.

1. Review Area/Topic*	Completeness and Technical Sufficiency Which Form Basis for Acceptability for Docketing				Changes to Planning Assumptions to be Considered in Development of Baseline Review Schedule				Review Dependencies Among Concurrent Reviews	
	2. Does COL section address the items required by regulation (refer to RG 1.206, Section C.IV.1)? (Yes/No)	3. Is COL section technically sufficient for this review area/topic? (yes/no)**	4. Can the technical deficiency be resolved through the RAI process? (yes/no)***	5. If no, for either completeness or technical sufficiency, identify deficiency(ies). This information will be needed for technical review.	6. Is the identified technical deficiency related to a risk-significant SSC? (yes/no)****	7. Are the pre-baseline review schedule and estimated staff-hours appropriate? (yes/no)	8. For each no, identify the change (or basis for change).	9. Identify the total review time in staff-hours*****	10. Can the review of the area/topic be completed without the completion of a concurrent review? (yes/no)	11. For each no, identify which application (DCD or COLA) and section.
14.3.12 Physical Security Hardware - ITAAC	Yes	yes	Yes	N/A	No	No	Guidance for level the appropriate level of detail is under development	<span style="border: 1px solid black; display: inline-block; width: 50px; height: 20px; vertical-align: middle;"></span>	Yes	N/A
ITAAC #1	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #2	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #3	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #4	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #5	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
^ ITAAC #6	No	yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ITAAC #7	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #8	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #9	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #10	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #11	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A

ITAAC #12	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #13	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #14	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #15	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
ITAAC #16	Yes	yes	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A

^ Applicant did not address ITAAC #6 for control room, central alarm station, and the last access control function for access into protected area.

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**Table 2: Reactor Security Licensing Programs Branch Resource Plan Revisions for STP ABWR Review**

Task Changes						Resource Changes		
SER Section No.	SER Section Title	Task *	Concurrent Dependent Review Activity **	Revised Start Date	Revised Finish Date	Name of Resource	Change Type ***	Revised Hours
13.6	Physical Security	PSER and RAIs	N/A	1/21/08	6/11/08	Out of Scope	Revised	Out of Scope
13.7	Fitness – For – Duty	PSER and RAIs	N/A	1/7/08	3/6/08		New	
13.7	Fitness – For – Duty	SER w/OI	N/A	7/7/08	8/1/08		New	

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\* Specify the task being revised: SER Phase 1 – PSER and RAIs Prepared  
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 Deleted – For an existing task and a currently assigned resource, if the resource is being removed from the task.