



# Addressing New Security COL Items

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ESBWR DCWG – NRC Meeting  
May 13, 2008



# Addressing New Security COL Items: Discussion Topics

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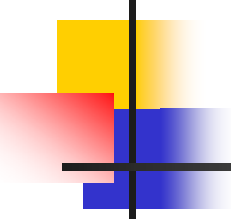
- Overview of New COL Items
  - DCD RAIs 13.6-3 – 71
- Use of 'COL Applicant' and 'COL Holder' terminology
- Utility approach to address new COL items
- Conclusions

# Overview of New Security COL Items



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- DCD RAIs 13.6-3 - 71
- Series of NRC-GEH interactions
- Topics:
  - Programmatic
  - Design
  - Analysis



# Utility Approach to Address New COL Items

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- Commitments related to security procedure development will be governed by COLA Table 13.4-201 milestones (e.g., for the Physical Security Plan) and associated license conditions specified by SECY-05-0197.
- Hardware-related items will be tied to implementation of the Physical Security Plan.



# Use of 'COL Applicant' and 'COL Holder' Terminology

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- **COL Applicant Item**: Information is provided in the application
- **COL Holder Item**: Commitment is made in the COLA to perform the work (e.g., develop procedures) which is normally performed after the license is issued
  - Information is not available for reasonable assurance finding



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- **DCD 13.6-6-A:** The COL applicant will provide a milestone for developing a program to control the issuance of security keys per Section 13.6.1.1.5
- **COLA:** - A key control program will be developed and implemented prior to the milestone for Physical Security Plan implementation (Table 13.4-201)



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- **DCD 13.6-7-H:** The COL Holder shall identify the location and the basic design requirements of the Secondary Alarm Station (SAS)
- **COLA:** As part of the development of the plant specific design, the licensee will define the location and the basic design requirements of the SAS...to support operation of the SAS prior to the milestone for Physical Security Plan implementation (Table 13.4-201)



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- **DCD 13.6-8-H:** The COL Holder shall design the security system such that no single postulated security event will disable the capability of both the Central and Secondary Alarm Stations. This will include the power supplies to both alarm stations.
- **COLA:** The licensee will demonstrate through a one time test, analyses, or a combination of tests and analyses, that no single postulated security event will disable the capability of both the Central and Secondary Alarm Stations...will be completed prior to the milestone for Physical Security Plan implementation (Table 13.4-201)





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- **DCD 13.6-9-A:** The COL applicant will identify a milestone for when the provisions described in Section 13.6.1.1.3, for alarm response procedures, will be incorporated into the applicable procedures
- **COLA:** Operating alarm response procedures will be developed and implemented in accordance with milestone defined in Section 13.5.2.1.
  - Section 13.5.2.1 states that operating procedures (which include alarm response procedures) will be developed at least six months prior to fuel load to allow for plant staff review and to develop operator license examinations



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- **DCD 13.6-10-A:** The COL applicant will identify a milestone for developing the test procedures described in Section 13.6.1.1.8
- **COLA:** The establishment of these surveillance test procedures and frequencies will be completed in accordance with the milestone for Physical Security Plan implementation (Table 13.4-201)



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- **DCD 13.6-11-A:** The COL applicant will identify a milestone for developing the test and maintenance procedures described in Section 13.6.1.1.8.
- **COLA:** ...Other testing and maintenance procedures will be established for security systems, including physical barriers. The establishment of these testing and maintenance procedures will be completed in accordance with the milestone for Physical Security Plan implementation (Table 13.4-201).



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- **DCD 13.6-12-A:** The COL Applicant will provide a milestone for developing an integrated response strategy to a confirmed security event that provides for manual actuation of plant systems by the operators to an evolving scenario necessitating escalating operator response.
- **COLA:** As part of the Security Plan, the licensee will develop an integrated response strategy...prior to the milestone for Physical Security Plan implementation (Table 13.4-201).



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- **DCD 13.6-13-A:** The COL applicant will identify a milestone for incorporating the provisions described in Section 13.6.1.1.3, for security alarm response procedures, into the applicable procedures.
- **COLA:** Security alarm response procedures will include steps for responding to unexpected indication of the opening or attempted opening of the rooms and/or cabinets listed in Table 4-1 of the ESBWR Safeguards Assessment Report (NEDE-33391). This action will be completed prior to the milestone for Physical Security Plan implementation (Table 13.4-201).



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- **DCD 13.6-14-A:** The COL applicant will identify a milestone for incorporating the administrative controls described in Section 13.6.1.1.5, for work performed in cabinets for the systems listed in Table 4-1 of NEDE-33391, into the applicable procedures.
- **COLA:** Administrative procedures will be developed prior to the milestone for Physical Security Plan implementation (Table 13.4-201) to control work being performed in cabinets containing the control circuitry (contact elements) for the systems listed in Table 4-1 of NEDE-33391.



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- **DCD 13.6-15-A:** The COL applicant will identify a milestone for incorporating the administrative controls described in Section 13.6.1.1.5, for work on the systems listed in Table 4-1 of NEDE-33391, into the applicable procedures.
- **COLA:** Administrative procedures will be developed prior to the milestone for Physical Security Plan implementation (Table 13.4-201) that will require two persons, each of whom are qualified to perform the intended work, to be present during the performance of any work on systems listed in Table 4-1 of NEDE-33391



# Conclusion

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- Commitments related to procedure development are governed by COLA Table 13.4-201 milestones (e.g., for the Physical Security Plan) and expected license conditions specified by SECY-05-0197.
- Hardware related items are tied to implementation of the Physical Security Plan.





# Questions?

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