



Bellefonte 3&4

Lee Nuclear 1&2

Summer 2&3

Vogtle 3&4

Harris 2&3

Levy 1&2

Turkey Point 6&7



Security - AP1000 Specific Tasks

February 12, 2009

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AP1000 COLA – Security Changes

- Overview of Security-Related Regulation Changes
- Summary of Expected COLA Changes
- Licensing Process
- Challenges (on-going activities)

Overview of Security-Related COLA Change Drivers

- **POWER REACTOR SECURITY REGULATIONS – (~3/31/2009?)**
 - Physical Security Plan changes
 - Cyber security
 - Large area fires and explosions
- **FITNESS FOR DUTY (3/31/2008)**
 - Part 26 – FFD during Operations
 - Part 26, App. K - FFD during Construction
- **CONSIDERATION OF AIRCRAFT IMPACT (June '09)**
- **SECURITY ITAAC (NEI - 12/19/08 Letter)**
- **Applicant submittal activities will require templates/guidance firmed-up by 3/1.**

Power Reactor Security Regulations

- **SCOPE – Physical Security Plan changes**
 - New physical security measures in §73.55
 - Similar requirements to those in Security Orders
 - Insights from security-related regulatory activity
 - New and Enhanced Guidance in Reg Guides
 - New Plant Security Task Force revising NEI 03-12
- **COLA IMPACTS**
 - Part 8, Security Plan
 - Part 10, License Conditions
- **LICENSING ACTIVITY**
 - Entire PSP revision to be submitted by 4/1/09

Power Reactor Security Regulations

- **SCOPE – Cyber Security (§73.54)**
 - Include Cyber Security Plan in COLA
 - Template (NEI 08-09) based on RG 5.71 interaction
 - Cyber Security Program
 - License Condition – Prior to Fuel Load
- **COLA IMPACTS**
 - Part 2, Section 13.6, “Security,” and Table 13.4-201
 - Part 10, License Conditions
 - Part 11, new Cyber Security Plan (10 CFR 2.390)
 - Part 9, Cyber Security Plan withheld from Part 11
- **LICENSING ACTIVITY**
 - Target Cyber Security COLA Changes for 4/1/09

Power Reactor Security Regulations

- **SCOPE – Large Area Fires & Explosions**
 - NEI 06-12 – Revised guidance submitted in January
 - Applicants develop guidance and strategies per §50.54(hh)(2)
 - Summary of strategies provided in 52.80(d) Report
 - 52.80(d) Report template provided to Staff
 - Report commits to actions to address strategies
- **COLA IMPACTS**
 - Part 11, 52.80(d) Report
 - Part 9, 52.80(d) Plan withheld from Part 11
- **LICENSING ACTIVITY**
 - Target is to submit 52.80(d) Report by 4/1/09

Power Reactor Security Regulations

- **SCOPE – Physical Security during Construction**
 - FSAR Section 13.6 cites NEI 03-12, App. F
 - Propose removal of statement in FSAR 13.6
 - Proposed Rule – September 2009
- **COLA IMPACTS**
 - Part 2, FSAR
 - Section 13.6, Security
 - Subsection 13.6.3, Reference 201
- **LICENSING ACTIVITY**
 - Deletions scheduled to be submitted by 4/1/09

Fitness for Duty (FFD) Regulations

- **SCOPE – Fitness for Duty (Operations)**
 - COLA requested exemption to address future Part 26
 - Part 26 promulgated after COLA submitted (3/08)
 - Exemption no longer needed
 - Revise COLA to withdraw exemption request
- **COLA IMPACTS**
 - Part 2, FSAR
 - Part 7, Departures and Exemption Requests
- **LICENSING ACTIVITY**
 - Target is to submit COLA changes by 4/1/09

Fitness for Duty (FFD) Regulations

- **SCOPE – Fitness for Duty (Construction)**
 - NEI 06-06 – Rev. 5 to be submitted 2/13/09
 - Resolves latest NRC comments
 - Sets random rate
 - Requests identification of random selection method and workforce population determination
 - Revise COLA to reference NEI 06-06, Rev. 5
- **COLA IMPACTS**
 - Part 2, FSAR
- **LICENSING ACTIVITY**
 - Target is to submit COLA changes by 4/1/09

Security ITAAC

- **SCOPE – COLA-Specific Physical Security ITAAC**
 - Identified need to separate DCD and COLA PS-ITAAC
 - Agreed to separation per NEI Letter dated 12/19
 - DCD generic ITAAC addressed in RAI response (2/2)
 - RAI-SRP-14.3.12-NSIR-06
 - COLA-specific ITAAC to be provided in COLA Part 10
- **COLA IMPACTS**
 - Part 2, FSAR
 - Part 10, Proposed License Conditions (Incl. ITAAC)
- **LICENSING ACTIVITY**
 - Target is to submit COLA changes by 4/1/09

Challenges (On-Going Activities)

- **Schedule Challenges (support of April 1 submittal)**
 - NEI guidance & templates under review
 - Converge on acceptance/endorsement by 3/1
 - Mature guidance will enable efficient change development and quality reviews
- **Schedule Challenges (review Security documents)**
 - Standard security changes in accordance with endorsed guidance will enable efficient NRC reviews
 - NRC guidance to be issued
 - Stability required to support review
 - Timely guidance will promote effective first round of RAIs; minimize need for subsequent RAIs

Other Challenges (On-Going Activities)

- **Congressional review due to high cost to industry**
- **Balancing New Plant and Operating Fleet's unique needs and priorities**
 - Operating plants – priority on program changes
 - New reactors – priority is FSAR/COLA changes
- **Converging on mutually agreed upon approach to addressing multitude of security-related enhancements**



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