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June 12, 2009

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

Subject: Duke Energy Carolinas, LLC
William States Lee III Nuclear Station - Docket Nos. 52-018 and 52-019
AP1000 Combined License Application for the
William States Lee III Nuclear Station Units 1 and 2
Changes to the Fitness for Duty Program Information, Physical Security During Construction, and Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)
Ltr# WLG2009.06-05

This letter identifies changes that will be made to a future revision of the William States Lee III (Lee) Nuclear Station Units 1 and 2 combined license application (COLA). These changes include the following: 1) a revision to the fitness for duty program requirements; 2) deletion of information regarding physical security during construction; and 3) relocation of certain physical security inspections, tests, and acceptance criteria (ITAAC) to the COLA from the Westinghouse DCD.

If you have any questions or need any additional information, please contact Peter S. Hastings, Nuclear Plant Development Licensing Manager, at 980-373-7820.

Bryan J. Dolan
Vice President
Nuclear Plant Development

D093
NRO

Enclosures:

1) Discussion of Changes to the Combined License Application to Address Revised Fitness for Duty (FFD) Regulations in 10 CFR Part 26
2) Discussion of Changes to Delete Information Provided on Physical Security During Construction
3) Discussion of Changes to Information Addressing Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

AFFIDAVIT OF BRYAN J. DOLAN

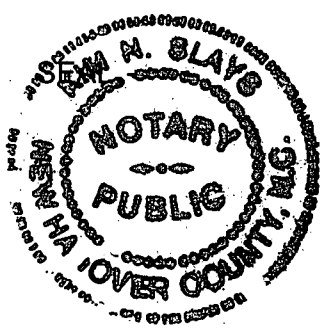
Bryan J. Dolan, being duly sworn, states that he is Vice President, Nuclear Plant Development, Duke Energy Carolinas, LLC, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this supplement to the combined license application for the William States Lee III Nuclear Station and that all the matter and facts set forth herein are true and correct to the best of his knowledge.

Bryan J. Dolan

Subscribed and sworn to me on June 12, 2009

Notary Public

My commission expires: April 19, 2010



xc (w/o enclosures):

Loren Plisco, Deputy Regional Administrator, Region II
Stephanie Coffin, Branch Chief, DNRL

xc (w/ enclosures):

Brian Hughes, Senior Project Manager, DNRL
Brian Anderson, Project Manager, DNRL

Discussion of Changes to the Combined License Application to Address Revised Fitness for Duty (FFD) Regulations in 10 CFR Part 26

Pursuant to 10 CFR 52.79(a)(44), Combined License application (COLA), Part 2, Final Safety Analysis Report (FSAR), Section 13.7 includes a description of, and implementation plans for the fitness for duty program (FFD) required by 10 CFR Part 26. Following the guidance in Regulatory Guide 1.206, *Combined License Applications for Nuclear Power Plants*, the current FSAR FFD program description addresses both the construction phase program and the operating phase programs based on a pending revision to 10 CFR Part 26. Since the revised 10 CFR Part 26 requirements were not in effect when the COLA was submitted, but were expected to be in effect at the time of implementation of the FFD Program, COLA Part 7, Departures and Exemptions, also requested a schedule exemption from the requirement of 10CFR 52.79(a)(44) to provide a "description of the fitness for duty program required by 10 CFR Part 26 and its implementation."

In March 2008, subsequent to the submittal of the Lee COL application, the NRC published the final rule for 10 CFR Part 26, *Fitness for Duty Programs (73 FR 16966-17235).* In order to address the new requirements in 10 CFR Part 26, Subpart K, *FFD Program for Construction*, the Nuclear Energy Institute (NEI) revised the guidance provided in NEI 06-06, *Fitness for Duty Program Guidelines for New Nuclear Power Plant Construction Sites*. By the referenced letter dated February 13, 2009, NEI provided NEI 06-06, Revision 4, to the NRC for review and endorsement.

The new FFD Rule also established requirements for managing worker fatigue at operating nuclear power plants. NRC regulation 10 CFR Part 26, Subpart I specifically addresses managing worker fatigue by designating individual break requirements, work hour limits, and annual reporting requirements. Prior to publication of 10 CFR Part 26, controls on worker fatigue were incorporated in plant-specific Technical Specifications. With the publication of requirements for managing worker fatigue in 10 CFR Part 26, controls on work hour limitations in COLA Part 4, PSTS 5.2.2.d, are no longer needed and are proposed to be removed from Technical Specifications. This change adopts NRC-approved Technical Specifications Task Force Traveler TSTF 511-A, Rev. 0, by eliminating these Technical Specification requirements as they are superseded by the requirements of 10 CFR Part 26.

The remaining changes provided below address COLA changes necessary to satisfy the requirements of 10 CFR 52.79(a)(44) and the revision to 10 CFR Part 26, including new Subparts I and K, as well as conforming to the guidance provided in NEI 06-06, Revision 4. The changes also withdraw the exemption request related to the timing of the 10 CFR Part 26 Fitness for Duty Final Rule.

These changes will be incorporated into a future revision of the combined license application (COLA).

Reference:

1. Letter from D. J. Walters, NEI, to Document Control Desk, NRC, Submittal of NEI 06-06, Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites, Revision 4 (ML090690583), dated February 13, 2009.

Associated Revision to the Lee Nuclear Station Combined License Application:

COLA Part 2, FSAR Section 13.7

COLA Part 4, Plant Specific Technical Specifications, Section A.2, Item GTS 5.2.2

COLA Part 4, Plant Specific Technical Specifications, Section B, Specification PSTS 5.2.2.b

COLA Part 7, Departures and Exemptions, Section B

Attachments:

1) Revised COLA Part 2, FSAR Section 13.7
2) Revised COLA Part 4, Plant Specific Technical Specifications, Section A.2, Item GTS 5.2.2, and Section B, Specification PSTS 5.2.2.b
3) Revised COLA Part 7, Departures and Exemptions, Section B

Discussion of Fitness for Duty (FFD) Changes

Attachment 1

Revised COLA Part 2, FSAR Section 13.7

COLA Part 2, FSAR Chapter 13, Section 13.7 will be revised as follows:

STD SUP 13.7-1

13.7 FITNESS FOR DUTY

The Fitness for Duty (FFD) Program is implemented and maintained in two phases; the construction phase program and the operating phase program. ~~The construction phase program is consistent with NEI 06-06 (Reference 201), which is currently under NRC review.~~ The construction and operations phase programs ~~is~~ are implemented~~,~~ as identified in Table 13.4-201. ~~The operations phase program will be consistent with the pending revision to 10 CFR Part 26, when issued. The operations phase program is implemented as identified in Table 13.4-201.~~

~~The FFD Program is based on the pending revision of Part 26 because on-site construction activities subject to Part 26 are not scheduled to occur until after the new regulations take effect. A request for an exemption from the current Part 26 regulations is discussed in Part 7 of the COLA.~~

The construction phase program is consistent with NEI 06-06 (Reference 201). The workforce population subject to random testing during construction is determined on a weekly basis by averaging the total number of active construction badges over the preceding seven-day period. The random selection from each week's workforce population is identified by a standard computer-generated random number generator using the number of active badges as the range of numbers considered in the weekly random testing selection.

The operations phase program is consistent with 10 CFR Part 26.

13.7.1 REFERENCES

201. Nuclear Energy Institute "Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites", NEI 06-06, Revision ~~1~~4, February 2009.

Discussion of Fitness for Duty (FFD) Changes

Attachment 2

Revised COLA Part 4, Plant Specific Technical Specifications, Section A.2, Item GTS 5.2.2, and Section B, Specification PSTS 5.2.2.b

COLA Part 4, Technical Specifications, PSTS Section A.2, Item GTS 5.2.2 (Unit Staff), will be revised as follows:

GTS 5.2.2

The bracketed information in the GTS reads:
[The unit staff organization shall include the following:
A non-licensed operator shall be assigned to each reactor containing fuel and an … b., c., d., e., f. …Policy Statement on Engineering Expertise on Shift.]

~~Remove the brackets and adopt the bracketed information in the GTS with the following exception:~~

~~TS Section 5.5.2, d. contains a typographical error in the last sentence which is corrected in the PSTS. "…have not be assigned" is changed to "…have not been assigned."~~

~~Justification:~~
~~Generic TS bracketed information is applicable and adopted.~~

Remove the brackets and adopt the bracketed information in the GTS except that 5.2.2.d is omitted.

Re-letter Items e and f as follows:

~~d. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physicists, auxiliary operators, and key maintenance personnel).~~

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.~~

~~e~~d. The operations manager or assistant operations manager shall hold an SRO license.

~~f~~e. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

Justification:

Generic TS bracketed information, except Item d, is applicable and adopted. Item d is superseded by the revised final rule for 10 CFR Part 26.

COLA Part 4, Technical Specifications, PSTS Section B, Specification 5.2.2, Paragraph b, will be revised as follows:

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.fe for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

Justification:
Conforming change with change to re-lettering of subparagraphs in GTS 5.2.2.

Discussion of Fitness for Duty (FFD) Changes

Attachment 3

Revised COLA Part 7, Departures and Exemptions, Section B

COLA Part 7, Departures and Exemptions, Section B and Paragraph B.1, will be revised as follows:

B. Lee Nuclear Station Exemption Requests

Duke requests the following exemptions related to:

1) ~~Fitness for Duty Program Description, and~~ Not used

2) Combined License Application Organization and Numbering

Discussion and justifications for ~~each of these~~this request~~s~~ is provided in the following pages.

1) ~~Fitness for Duty Program Description (10 CFR Part 26)~~Withdrawn. This exemption is no longer required.

~~Applicable Regulation(s): 10 CFR 52.79(a)(44)~~

~~Specific wording from which exemption is requested:~~

~~(a) The application must contain a final safety analysis report that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components of the facility as a whole. The final safety analysis report shall include the following information, at a level of information sufficient to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license:~~

~~(44) A description of the fitness-for-duty program required by 10 CFR part 26 and its implementation.~~

~~Pursuant to 10 CFR 52.7 and 52.93 (as amended and promulgated effective Sept. 27, 2007), Duke Energy Carolinas, LLC (Duke) requests an exemption from the requirement of 10 CFR 52.79(a)(44) to provide a "description of the fitness-for-duty program required by 10 CFR part 26 and its implementation" in its application for a combined operating license for the William States Lee III Nuclear Station, Units 1 and 2 (Lee Nuclear Station). Duke proposes to provide the FFD Program description required by 10 CFR 52.79(a)(44) based on the revised 10 CFR Part 26 regulations that are expected to be promulgated and become effective in early 2008 since these are the regulations that are expected to be in effect at the time of implementation of the program.~~

~~Discussion:~~

~~In an April 17, 2007, affirmation session, the Commission approved a final rule amending FFDregulations in 10 CFR Part 26 for both the construction and operating phases for a new nuclear plant. The new and revised Part 26 regulations are expected to be promulgated and become effective in 2008. Implementation of a fitness for duty program at this station is not expected to be required until after 2008.~~

~~The construction phase of the Fitness for Duty Program as applied to new plants is not required to be implemented until the commencement of on-site construction of safety or security-related systems, structures and components. Duke will not begin these activities until after the amendments to 10 CFR Part 26 regulations are expected to take effect. The operational phase of the FFD Program is required to be implemented prior to fuel load.~~

~~In view of the near-term effectiveness of new FFD regulations, it would be more efficient for both Duke and the NRC to submit the FFD Program description required by 10 CFR 52.79(a)(44) based on the revised Part 26 rules rather than the rules currently in effect. Accordingly, Duke hereby submits a request for an exemption from current Part 52 regulations pursuant to 10 CFR 52.7, "Specific Exemptions," and 10 CFR 52.93, "Exemptions and Variances."~~

~~Granting this request, which is authorized by law, would allow the NRC to conduct its acceptance review of the Lee Nuclear Station COL application based on the revised rules that will become effective in the near future. Duke does not expect the NRC to issue the requested COL until the revised FFD rules take effect. For this and other reasons, granting this exemption request will not present an undue risk to the public health and safety, and is consistent with the common defense and security.~~

~~The pending amendments to Part 26 create "special circumstances," as defined in 10 CFR50.12 (Specific Exemptions) that warrant granting this exemption. Applying the current Fitness for Duty regulations in reviewing the FFD Program description required by 10 CFR 52.79(a)(44) would not serve, and is not necessary to achieve, the underlying purposes of the rule. Further,the underlying purpose of 10 CFR 52.79(a)(44) can be satisfied by meeting the requirements of the revised FFD regulations that will become effective in the near future.~~

~~Moreover, compliance with the current rule would cause undue hardship for Duke and would also be inefficient and burdensome for the NRC staff. That approach would require Duke to prepare, and NRC to review, information based on Fitness for Duty regulations that will soon be superseded by Part 26 amendments, and then (presumably) complete a similar submittal under the revised FFD rules.~~

~~For these reasons, Duke requests approval of the requested exemption from the Part 52 requirements to provide a description (in the FSAR) of the fitness for duty program that meets the current Part 26 Fitness for Duty regulations.~~

Discussion of Changes to Delete Information Provided on Physical Security During Construction

COLA Part 2, FSAR, Section 13.6 addressed the physical security plan during construction, including control of access to the new plant construction site. During review of the application, the NRC staff declined a review of this information, as NRC regulations do not currently address this aspect of physical security. In accordance with the staff's position, the following changes delete the statements relating to the physical security during construction.

The attached mark-up to COLA Part 2, FSAR, Section 13.6, deletes the second paragraph of STD COL 13.6-1 related to physical security during construction. The attached mark-up to COLA Part 2, FSAR, Section 13.6.2, deletes the associated Reference.

These changes will be incorporated into a future revision of the combined license application (COLA).

Associated Revision to the Lee Nuclear Station Combined License Application:

COLA Part 2, FSAR, Section 13.6

COLA Part 2, FSAR, Subsection 13.6.2

Attachment:

1) Revised COLA Part 2, FSAR Section 13.6 and Subsection 13.6.2

Discussion of Changes to Delete Information Provided on Physical Security During Construction

Attachment 1

Revised COLA Part 2, FSAR Section 13.6 and Subsection 13.6.2

COLA Part 2, FSAR Chapter 13, Section 13.6 will be revised as follows:

13.6 SECURITY

This section of the referenced DCD is incorporated by reference with the following departures and /or supplements.

STD COL 13.6-1 The Security Plan consists of the Physical Security Plan, the Training and Qualification Plan, and the Safeguards Contingency Plan. The Security Plan is submitted to the Nuclear Regulatory Commission as a separate licensing document in order to fulfill the requirements of 10 CFR 52.79(a)(35) and 52.79(a)(36). The Security Plan meets the requirements contained in 10 CFR Part 26 and 10 CFR Part 73 and will be maintained in accordance with the requirements of 10 CFR 52.98. The Plan is categorized as Security Safeguards Information and is withheld from public disclosure pursuant to 10 CFR 73.21.

~~The Physical Security Plan during construction, including control of access to the new plant construction site, is consistent with NEI 03-12, Appendix F (Reference 201), which is currently under NRC review.~~

COLA Part 2, FSAR Chapter 13, Subsection 13.6.2 will be revised as follows:

13.6.2 REFERENCES

201. ~~NEI 03-12, "Appendix F, Security Measures During New Reactor Construction," Revision 2, September 2007.~~Not used.

Discussion of Changes to Information Addressing Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)

The Physical security system provides physical features to detect, assess, delay, assist in response to, and defend against design basis threat (DBT) for radiological sabotage. The Westinghouse AP1000 Design Control Document (DCD), Tier 1, Subsection 2.6.9, summarizes the design description of the AP1000 physical security system. DCD Tier 1, Table 2.6.9-1 specified the design commitments and the inspections, tests, analyses, and associated acceptance criteria for the physical security system, as an acceptable alternative to the security software ITAAC identified in NUREG-0800, Standard Review Plan (SRP) Section 14.3.12.

However, several of the physical security ITAAC (PS-ITAAC) identified in SRP 14.3.12 related to features of the protected area boundary and the intrusion detection system, are inappropriate in the DCD Table 2.6.9-1 because the boundary barrier (i.e., protected area fence and access control points) is not included in the scope of the design certification. The resolution of this inconsistency has been discussed with the NRC staff and is addressed generically in a letter from the Nuclear Energy Institute (NEI) dated December 19, 2008 (Reference 1), and specifically for the AP1000 reactor design request for additional information (RAI) number 14.3.12-NSIR-06. In a letter dated February 2, 2009 (Reference 2), Westinghouse provided a response to RAI-SRP 14.3.12-NSIR-06, including changes to DCD Tier 1 Subsection 2.6.9 and Table 2.6.9-1 that remove inappropriate design commitments and PS-ITAAC from the DCD. The RAI response also stated that as appropriate, the COL applicants will incorporate these standard ITAACs into their COL applications.

The changes provided below address the COL application changes necessary to incorporate into the COLA the standard site-specific physical security design commitments and PS-ITAAC that were previously removed from the AP1000 DCD Tier 1 Subsection 2.6.9 and Table 2.6.9-1. As indicated above, these changes are based on expected AP1000 DCD changes. Should these DCD changes not occur as expected; the COLA will be appropriately revised to reflect the final DCD.

These changes will be incorporated into a future revision of the combined license application (COLA).

References:

1. Letter from Russell J. Bell, NEI, to Scott A. Morris, NRC, Security ITAAC Related to New Plant Construction, dated December 19, 2008.
2. Letter from Robert Sisk, Westinghouse, to NRC Document Control Desk, AP1000 Response to Request for Additional Information (SRP 14), dated February 2, 2009.

Associated Revision to the Lee Nuclear Station Combined License Application:

COLA Part 10, Proposed License Conditions (Including ITAAC), Appendix B. Inspections, Tests, Analysis, and Acceptance Criteria

Attachment:

1) Revised COLA Part 10, Proposed License Conditions (Including ITAAC), Appendix B. Inspections, Tests, Analysis, and Acceptance Criteria

Discussion of Changes to Delete Information Provided on Physical Security During Construction

Attachment 1

Revised COLA Part 210, Proposed License Conditions (Including ITAAC), Appendix B. Inspections, Tests, Analysis, and Acceptance Criteria

COLA Part 10, Proposed License Conditions (Including ITAAC), Appendix B. Inspections, Tests, Analysis, and Acceptance Criteria will be revised as follows:

Appendix B. Inspections, Tests, Analysis and Acceptance Criteria

AP1000 DCD Tier 1 ITAAC

The Tier 1 information (including the ITAAC) of the referenced DCD is incorporated by reference with the following departures and/or supplements.

Plant Specific ITAAC

Add the following information to the information provided in the referenced DCD Tier 1 following Section 2.3.29:

2.3.30 Storm Drain System
No entry for this system.

2.3.31 Raw Water System
No entry for this system.

Add the following information to the information provided in the referenced DCD Tier 1 following

Section 2.5.10:

2.5.11 Meteorological and Environmental Monitoring System
No entry for this system.

2.5.12 Closed Circuit TV System
No entry for this system.

Add the following information to the information provided in the referenced DCD Tier 1 following

Section 2.6.11:

2.6.12 Transmission Switchyard and Offsite Power System
No entry for this system.

Physical Security ITAAC

The physical security ITAAC that are in the scope of the Westinghouse AP1000 standard design are included in the referenced DCD Tier 1 Subsection 2.6.9 as incorporated by reference above. Site-specific physical security ITAAC that are outside the scope of the Westinghouse AP1000 standard design in DCD Tier 1 Subsection 2.6.9 are provided in the attached Table 2.6.9-2. Include these ITAAC after the DCD Tier 1 Table 2.6.9-1 ITAAC.

Emergency Planning ITAAC

The emergency planning ITAAC are included in the attached tTable 3.8-1. Include these ITAAC after DCD Tier 1 Section 3.7.

COLA Part 10, Proposed License Conditions (Including ITAAC), Appendix B. Inspections, Tests, Analysis, and Acceptance Criteria will be revised to add new Table 2.6.9-2 as follows:

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA

Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
1. The external walls, doors, ceiling, and floors in the location within which the last access control function for access to the protected area is performed are bullet resistant.	Type test, analysis, or a combination of type test and analysis will be performed for the walls, doors, ceilings, and floors in the location within which the last access control function for access to the protected area is performed.	A report exists and concludes that the walls, doors, ceilings, and floors in the location within which the last access control function for access to the protected area is performed are bullet-resistant.
2. Physical barriers for the protected area perimeter are not part of vital area barriers.	An inspection of the protected area perimeter barrier will be performed to verify that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.	A report exists and concludes that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.
3. Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allow 20 feet of observation on either side of the barrier. Where permanent buildings do not allow a 20 foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier.	An inspection of the isolation zone will be performed to verify that the isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area which allows 20 feet of observation of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20 foot observation distance on the inside of the protected area barrier, the inspection will confirm that the building walls are immediately adjacent to, or an integral part of, the protected area barrier.	A report exists and concludes that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20 foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20 foot observation distance does not apply.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	**Inspections, Tests, and Analyses**	**Acceptance Criteria**
4. Intrusion detection system can detect penetration or attempted penetration of the protected area barrier.	Tests, inspections or a combination of tests and inspections of the intrusion detection system will be performed to verify the system can detect penetration or attempted penetration of the protected area barrier and that subsequent alarms annunciate in both the Central Alarm Station and Secondary Alarm Station.	A report exists and concludes that the intrusion detection system can detect penetration or attempted penetration of the protected area barrier and subsequent alarms annunciate in the Central Alarm Station and Secondary Alarm Station.
5. Access control points are established to: (a) Control personnel and vehicle access into the protected area. (b) Detect firearms, explosives, and incendiary devices at the protected area personnel access points.	A test, inspection, or combination of tests and inspections of installed systems and equipment will be performed to verify that access control points to the protected area exist and that: (a) Personnel and vehicle access into the protected area is controlled. (b) Detection equipment is capable of detecting explosives, incendiary devices, and firearms at the protected area personnel access points.	A report exists and concludes that: (a) Access points for the protected area are configured to control access. (b) Detection equipment is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.
6. An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas without escort.	A test of the access control system with numbered picture badges will be performed to verify that unescorted access to protected areas is granted only to authorized personnel.	A report exists and concludes that the access authorization system with numbered picture badges can identify and authorize protected area access only to those personnel with unescorted access authorization.