

July 9, 2009

Mr. Eugene S. Grecheck
Vice President - Nuclear Development
Dominion
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 039
(SRP SECTION 13.06 – PHYSICAL SECURITY) RELATED TO THE
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION

Dear Mr. Grecheck:

By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a combined license application for North Anna Unit 3 pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Dominion is requested to respond within 45 days of the date of this letter. If the RAI response involves changes to application documentation, Dominion is requested to include the associated revised documentation with the response.

Should you have questions, please contact me at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
ESBWR/ABWR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-017

Enclosure: Request for Additional Information

July 9, 2009

Mr. Eugene S. Grecheck
Vice President - Nuclear Development
Dominion
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 039
(SRP SECTION 13.06 – PHYSICAL SECURITY) RELATED TO THE
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION

Dear Mr. Grecheck:

By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a combined license application for North Anna Unit 3 pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Dominion is requested to respond within 45 days of the date of this letter. If the RAI response involves changes to application documentation, Dominion is requested to include the associated revised documentation with the response.

Should you have questions, please contact me at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
ESBWR/ABWR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-017
Enclosure: Request for Additional Information
Distribution:
DGordon, NSIR PPrescott, NSIR
TKevern, NRO DHuyck, NSIR
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ADAMS Accession No.: ML091900067

OFFICE	TR: NSIR	TL: NSIR	BC: NSIR	PM:DNRL:NGE1	PM:DNRL:NGE1
NAME	DGordon*	PPrescott*	DHuyck*	JJessie*	TKevern*
DATE	6/29/09	6/29/09	6/29/09	6/30/09	7/7/09

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information
North Anna, Unit 3
Dominion
Docket Number 52-017
SRP Section: 13.06.01 - Physical Security
Combined License Application Section: 13.6.1

QUESTIONS for ESBWR/ABWR Projects 1 (NGE1)

13.06-1

Appendix C, Safeguards Contingency Plan, Page C-18, Section 4.1.1, 4th paragraph: Please clarify this description. This description is **not** consistent with the North Anna PSP regarding commitments and training of "armed security officers".

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06-2

Appendix C, Safeguards Contingency Plan, Page C-20, Section 4.5, 3rd paragraph: This description is **not** consistent with the North Anna PSP regarding commitments and training of "armed security officers".

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06-3

Appendix C, Safeguards Contingency Plan, Page C-20, Section 5.2, 1st paragraph: Please clarify this description. This description is **not** consistent with the North Anna PSP regarding commitments and training of "armed security officers".

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06-4

Appendix C, Safeguards Contingency Plan, Page C-21, Section 5.2, 2nd paragraph: Please confirm this commitment. This description is **not** consistent with the North Anna PSP regarding commitments and training of "armed security officers".

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06-5

Appendix C, Safeguards Contingency Plan, Page C-25, Section 8, 2nd paragraph, subparagraph #5, 2nd bullet. Please confirm this commitment. This description is **not** consistent with the North Anna PSP regarding "armed security officers" being "onsite at all times".

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06.01-1

Appendix C, Safeguards Contingency Plan, Page C-24, Section 7, 3rd paragraph: Please describe the methodology used by North Anna Unit #3 in the development of target sets. Please describe the types of information gathered/used (i.e., design certification document, PRA process, flood/fire analysis, etc.) and the areas of expertise that were available through the personnel assigned to the stated "expert panel". In addition, please describe the criteria used to identify and group target sets.

Regulatory Basis: 10 CFR 73.55(f)(1). The licensee shall document and maintain the process used to develop and identify target sets, to include the site-specific analyses and methodologies used to determine and group the target set equipment or elements.

13.06.01-2

Physical Security Plan, Page 28, Section 15.1, 4th paragraph and Page 41, Section 21.4. Please clarify the types and capabilities of cameras used at North Anna for assessment inside the isolation zone, assessment of alarms, and/or to meet other site-specific observation and monitoring needs, to a description of how low-light-technology will be used. If used as a compensatory measure for loss of lighting, please address in Section 21.4.

Regulatory Basis: 10 CFR 73.55(i)(6)(ii). The licensee shall provide a minimum illumination level of 0.2 foot-candles, measured horizontally at ground level, in the isolation zones and appropriate exterior areas within the protected area. Alternatively, the licensee may augment the facility illumination system by means of lowlight technology to meet the requirements of this section or otherwise implement the protective strategy.

10 CFR 73.55(i)(6)(iii). The licensee shall describe in the security plans how the lighting requirements of this section are met and, if used, the type(s) and application of low-light technology.

13.06.01-3

Appendix B Training and Qualification Plan, Page B-4, Section 2.4, 2nd paragraph, 6th bullet. In this bullet you list "agility" and endurance together but do not include a general description of how agility will be demonstrated. Generally, agility can be demonstrated by an individual through performing tactical movements through an area containing obstacles similar to those that would be encountered during a response at North Anna Unit #3. Please explain how endurance and agility are both demonstrated by the the same stated actions.

Regulatory Basis: 10 CFR Part 73, Appendix B, Section II, paragraph B.4.b(3). The physical fitness test must include physical attributes and performance objectives which demonstrate the strength, endurance, and agility, consistent with assigned duties in the Commission-approved security plans, licensee protective strategy, and implementing procedures during normal and emergency conditions.

13.06.01-4

Appendix B Training and Qualification Plan, Page B-19, Table 1: Critical Task Matrix, #20. Please describe that "armed security officers" are or are not used to augment armed responders as part of the North Anna Unit #3 protective strategy, and therefore are or are not required to acquire training associated with response to contingency events and execution of the defensive strategy as is indicated by the critical task matrix.

Regulatory Basis: 10 CFR Part 73, Appendix B, Section II, paragraph D.2.a. Armed and unarmed individuals shall be re-qualified at least annually in accordance with the requirements of this appendix and the Commission-approved training and qualification plan.

13.06.01-5

Physical Security Plan, Page 27, Section 14.5, 4th paragraph: Please address as applicable to North Anna Unit #3, how the secondary alarm station (SAS), spent fuel pool, and secondary power sources (for alarm annunciation equipment and non-portable communications), are protected as vital areas.

Regulatory Basis: 10 CFR 73.55(e)(9)(v). At a minimum, the following shall be considered vital areas: (A) The reactor control room; (B) The spent fuel pool; (C) The central alarm station; and (D) The secondary alarm station in accordance with § 73.55(i)(4)(iii).

10 CFR 73.55(e)(9)(vi). At a minimum, the following shall be located within a vital area: (A) The secondary power supply systems for alarm annunciation equipment; and (B) The secondary power supply systems for non-portable communications equipment.

13.06.01-6

Physical Security Plan, Page 30, Section 15.3, 1st paragraph, last sentence: Please confirm that the secondary power supply systems identified in this sentence are the same or different than the secondary power supply identified in the 4th sentence of this paragraph.

Regulatory Basis: 10 CFR 73.55(e)(9)(v). At a minimum, the following shall be considered vital areas: (A) The reactor control room; (B) The spent fuel pool; (C) The central alarm station; and (D) The secondary alarm station in accordance with § 73.55(i)(4)(iii).

10 CFR 73.55(e)(9)(vi) At a minimum, the following shall be located within a vital area: (A) The secondary power supply systems for alarm annunciation equipment; and (B) The secondary power supply systems for non-portable communications equipment.

13.06.01-7

Physical Security Plan, Page 18, Section 14.2, 3rd paragraph: Please address the methodology and frequency that North Anna Unit #3 has chosen to monitor and/or patrol the spent fuel pool, to include proposed alternative measures if applicable.

Regulatory Basis: 10 CFR 73.55(i)(5)(v) Armed security patrols shall periodically inspect vital areas to include the physical barriers used at all vital area portals.

13.06.01-8

Physical Security Plan, Page 29, Section 15.2, 1st paragraph: Please clarify the types and use of cameras used at North Anna Unit #3. This paragraph does not clearly identify the types of cameras used and/or the locations/circumstances that each type will be used.

Regulatory Basis: 10 CFR 73.55(i)(5)(ii). The licensee shall provide continuous surveillance, observation, and monitoring of the owner controlled area as described in the security plans to detect and deter intruders and ensure the integrity of physical barriers or other components and functions of the onsite physical protection program. Continuous surveillance, observation, and monitoring responsibilities may be performed by security personnel during continuous patrols, through use of video technology, or by a combination of both.

13.06.01-9

Physical Security Plan, Page 30, Section 15.4, 1st paragraph: Please clarify that video assessment equipment is the same or different from the equipment identified in Sections 15.1 and 15.2 of the PSP.

Regulatory Basis: 10 CFR 73.55(i)(1) The licensee shall establish and maintain intrusion detection and assessment systems that satisfy the design requirements of § 73.55(b) and provide, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the licensee's protective strategy.

10 CFR 73.55(i)(5)(ii). The licensee shall provide continuous surveillance, observation, and monitoring of the owner controlled area as described in the security plans to detect and deter intruders and ensure the integrity of physical barriers or other components and functions of the onsite physical protection program. Continuous surveillance, observation, and monitoring responsibilities may be performed by security personnel during continuous patrols, through use of video technology, or by a combination of both.

13.06.01-10

Physical Security Plan, Page 13, Section 11.3, 4th paragraph: Please describe the frequency of surveillance for "Any glass/windows which form part of the PA barrier. Please clarify if the identified glass/windows are subject to "continuous" surveillance and control by security personnel.

Regulatory Basis: 10 CFR 73.55(e)(8)(iv). Where building walls or roofs comprise a portion of the protected area perimeter barrier, an isolation zone is not necessary provided that the detection and assessment requirements of this section are met, appropriate barriers are installed, and the area is described in the security plans.

13.06.01-11

Physical Security Plan, Page 14, Section 11.3, 8th paragraph: If applicable, please identify/reference where exceptions to the PA/VA barrier separation requirement are addressed in the PSP, as applicable to North Anna Unit #3.

Regulatory Basis: 10 CFR 73.55(e)(8)(i)(C). Be separated from any other barrier designated as a vital area physical barrier, unless otherwise identified in the Physical Security Plan.

13.06.01-12

Physical Security Plan, Page 15, Section 11.3, 11th paragraph: Please describe any measures to be taken to ensure that detection, assessment, observation, and surveillance requirements of 10 CFR 73.55 are met and appropriate barriers are installed to prevent potential exploitation of structures/buildings whose walls and roofs comprise a portion of the PA barrier. Please describe measures to be taken to ensure that detection, assessment, observation, and surveillance requirements are met and barriers are installed to prevent potential exploitation of unattended openings that intersect the PA boundary (which may include but are not limited to the subterranean penetrations already addressed).

Regulatory Basis: 10 CFR 73.55(e)(8)(iv). Where building walls or roofs comprise a portion of the protected area perimeter barrier, an isolation zone is not necessary provided that the detection and, assessment requirements of this section are met, appropriate barriers are installed, and the area is described in the security plans. 10 CFR 73.55(e)(8)(ii). Penetrations through the protected area barrier must be secured and monitored in a manner that prevents or delays, and detects the exploitation of any penetration. 10 CFR 73.55(i)(5)(iii) Unattended openings that intersect a security boundary such as underground pathways must be protected by a physical barrier and monitored by intrusion detection equipment or observed by security personnel at a frequency sufficient to detect exploitation. 10 CFR 73.55(i)(5)(iv) Armed security patrols shall periodically check external areas of the protected area to include physical barriers and vital area portals. 10 CFR 73.55(i)(5)(ii) The licensee shall provide continuous surveillance, observation, and monitoring of the owner controlled area as described in the security plans to detect and deter intruders and ensure the integrity of physical barriers or other components and functions of the onsite physical protection program. Continuous surveillance, observation, and monitoring responsibilities may be performed by security personnel during continuous patrols, through use of video technology, or by a combination of both.

13.06.01-13

Physical Security Plan, Page 7, Section 9, 1st and 2nd paragraphs: Please clarify the statement "Security Officers are properly equipped with weapons and equipment..." The title "security officer" is not identified on page 5 of the PSP. Only "Armed Security Officer" and "Unarmed individuals" are defined. Are all "Security Officers" armed?

Regulatory Basis: 10 CFR 73.55(k)(6) Armed security officers. (i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties. (ii) The minimum number of armed security officers designated to strengthen onsite response capabilities must be documented in the security plans.

13.06.01-14

Physical Security Plan, Page 35, Section 18, 3rd paragraph: Please describe the types of armed personnel that will comprise the armed response force capabilities at North Anna Unit 3. Does North Anna Unit #3 plan to utilize "armed security officers" to augment the armed responders? If yes, the number of armed security officers identified in this paragraph must be available "onsite and at all times"? If no, please delete reference to armed security officers as they are not a committed element of the protective strategy. Also, please confirm that the designated number of armed responders inside the PA, at all times, will not be assigned any other duties that would interfere with their capability to respond in accordance with the protective strategy and necessary timelines. Lastly, please ensure that all personnel committed to armed response in accordance with the protective strategy are appropriately captured within the Critical Task matrix described in Appendix B to this PSP.

Regulatory Basis: 10 CFR 73.55(k)(1) The licensee shall establish and maintain, at all times, properly trained, qualified and equipped personnel required to interdict and neutralize threats up to and including the design basis threat of radiological sabotage as defined in § 73.1, to prevent significant core damage and spent fuel sabotage.

10 CFR 73.55 (k)(5)(iii) Armed responders shall be available at all times inside the protected area and may not be assigned other duties or responsibilities that could interfere with their assigned response duties.

10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06.01-15

Appendix C, Safeguards Contingency Plan, Page C-1, Section 1.2, 2nd paragraph: Please clarify if this paragraph is/is not a change to the current ISFSI plan for Units 1 & 2. If no, there is no need to submit this information as part of the Unit #3 application. If yes, please clarify if "Security Officer Responders" to ISFSI events" are the same personnel identified in the PSP (armed responders or armed security officers) for implementing the North Anna protective strategy inside the PA?

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06.01-16

Appendix C, Safeguards Contingency Plan, Page C-25, Section 8, 3rd paragraph, 4th sentence. Please confirm that "only" armed responders are available to implement protective strategy and ensure consistency with other statements made in the North Anna Unit #3 security plans regarding the availability of "armed security officers" to augment armed responders inside the PA.

Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.

13.06.01-17

Physical Security Plan, Page 7, Section 8, 3rd sentence: Please clarify reference to Law Enforcement Response Plan in relation to "other response organizations." The Law Enforcement Response Plan identified in the 2nd sentence of this paragraph on page 6 should address only LLEA and site procedures should address how security/LLEA actions are coordinated with "other" responses.

Regulatory Basis: 10 CFR 73.55(k)(9) Law enforcement liaison. To the extent practicable, licensees shall document and maintain current agreements with applicable law enforcement agencies to include estimated response times and capabilities.

13.06.01-18

Appendix C, Safeguards Contingency Plan, Page C-22, Section 5.6, 1st paragraph, 3rd sentence. Please confirm that "Integrated Response Plan" is the correct title. See PSP Section 8 where the title Law Enforcement Response Plan.

Regulatory Basis: 10 CFR 73.55(k)(9) Law enforcement liaison. To the extent practicable, licensees shall document and maintain current agreements with applicable law enforcement agencies to include estimated response times and capabilities.

13.06.01-19

Appendix C, Safeguards Contingency Plan, Page C-22, Section 5.9, 1st paragraph, 5th sentence. Please confirm that "Integrated Response Plan" is the correct title. See PSP Section 8 where the title Law Enforcement Response Plan.

Regulatory Basis: 10 CFR 73.55(k)(9) Law enforcement liaison. To the extent practicable, licensees shall document and maintain current agreements with applicable law enforcement agencies to include estimated response times and capabilities.

13.06.01-20

Physical Security Plan, Page 9, Section 11.1. Please add a clarifying statement that other than the outer VBS located in the North Anna Unit 3 OCA described in section 11.2, OCA barriers are not employed at North Anna Unit 3.

Regulatory Basis: 10 CFR 73.55(a)(2). The security plans must identify, describe, and account for site-specific conditions that affect the licensee's capability to satisfy the requirements of this section.

13.06.01-21

Physical Security Plan, Page 2, Section 1.1, 3rd & 4th paragraphs: These paragraphs are currently silent regarding the description/consideration given to railroads, airports, pipelines, hazardous material facilities, and pertinent environmental features. If applicable, please provide a general description of how these features impact the physical protection program design, or if not applicable, please state so in response to this RAI.

Regulatory Basis: 10 CFR Part 73, Appendix C, Section II, paragraph B(3)(b). Plans must also include a description and map of the site in relation to nearby towns, transportation routes (e.g., rail, water, and roads), pipelines, airports, hazardous material facilities, and pertinent environmental features that may have an effect upon coordination of response activities. 10 CFR 52.17(a)(1)(x) Information demonstrating that site characteristics are such that adequate security plans and measures can be developed.

13.06.01-22

Physical Security Plan, Page 9, Section 11.2.1. Please provide a general description of natural terrain features that make up portions of the outer VBS, a general description of why these features satisfy NRC criteria for a VBS, and provide a reference to the criteria used to determine the acceptability of these features. Please provide a reference to the criteria used to determine that the current North Anna outer VBS location and stand-off distance are appropriate given the proximity of the proposed Unit #3 to the current outer VBS location.

Regulatory Basis: 10 CFR 73.55(e)(2). The licensee shall retain, in accordance with §73.70, all analyses and descriptions of the physical barriers and barrier systems used to satisfy the requirements of this section, and shall protect these records in accordance with the requirements of § 73.21.

13.06.01-23

Physical Security Plan, Page 11, Section 11.2.2, 6th paragraph: Please describe the location of the secondary power source for active vehicle barriers and provide a general description for how this power source is protected to ensure its availability when needed.

Regulatory Basis: 10 CFR 73.55(e)(10)(i)(B). Periodically check the operation of active vehicle barriers and provide a secondary power source, or a means of mechanical or manual operation in the event of a power failure, to ensure that the active barrier can be placed in the denial position to prevent unauthorized vehicle access beyond the required standoff distance.

13.06.01-24

Physical Security Plan, Page 11, Section 11.2.2, 4th paragraph: Please provide a general description of how North Anna Unit #3 will design, construct, and locate the Central and Secondary Alarm Stations. This description should generally address redundancy and separation to provide protection against the design basis vehicle bomb as well as protection against a single act. For example, will North Anna upgrade the current SAS to CAS standards, construct a new CAS and SAS for only Unit #3, construct a new CAS and SAS for Units 1, 2, and 3, construct a new CAS to be used in conjunction with the existing CAS?

Regulatory Basis: 10 CFR 73.55(i)(4)(iii). Applicants for an operating license under the provisions of part 50 of this chapter, or holders of a combined license under the provisions of part 52 of this chapter, shall construct, locate, protect, and equip both the central and secondary alarm stations to the standards for the central alarm station contained in this section. Both alarm stations shall be equal and redundant, such that all functions needed to satisfy the requirements of this section can be performed in both alarm stations.

13.06.01-25

Physical Security Plan, Page 30, Section 15.4, 3rd & 4th paragraphs: Please clarify which of these two paragraphs is applicable at North Anna Unit #3. Also, see related RAI to Section 11.2.2, 4th paragraph.

Regulatory Basis: 10 CFR 73.55(i)(4)(iii). Applicants for an operating license under the provisions of part 50 of this chapter, or holders of a combined license under the provisions of part 52 of this chapter, shall construct, locate, protect, and equip both the central and secondary alarm stations to the standards for the central alarm station contained in this section. Both alarm stations shall be equal and redundant, such that all functions needed to satisfy the requirements of this section can be performed in both alarm stations.

13.06.01-26

Physical Security Plan, Page 33, Section 16.2, 1st paragraph: Please revise to address SAS at North Anna Unit #3 and for consistency with 10 CFR 73.55(i)(4)(iii).

Regulatory Basis: 10 CFR 73.55(i)(4)(iii). Applicants for an operating license under the provisions of part 50 of this chapter, or holders of a combined license under the provisions of part 52 of this chapter, shall construct, locate, protect, and equip both the central and secondary alarm stations to the standards for the central alarm station contained in this section. Both alarm stations shall be equal and redundant, such that all functions needed to satisfy the requirements of this section can be performed in both alarm stations

13.06.01-27

Physical Security Plan, Page 5, Section 4.1, 3rd paragraph: As stated, Response Team Leaders are not armed. Therefore, please explain what is meant by the phrase "defined in" facility procedures. Do procedures assign Response Team Leaders with "armed response duties", or only "unarmed" duties such as command and control? Do procedures contain a definition of the position or do procedures "identify" the duties and responsibilities of the position.

Regulatory Basis: 10 CFR 73.55(c)(7)(ii). "Implementing procedures must document the structure of the security organization and detail the types of duties, responsibilities, actions, and decisions to be performed or made by each position of the security organization."

13.06.01-28

Physical Security Plan, Page 5, Section 4.1, 6th paragraph: Please explain what is meant by the phrase "but not limited to" as used in relation to duties and responsibilities of Alarm Station Operators.

Regulatory Basis: 10 CFR 73.55(i)(4)(ii)(B). Continuously staff each alarm station with at least one trained and qualified alarm station operator. The alarm station operator must not be assigned other duties or responsibilities which would interfere with the ability to execute the functions described in § 73.55(i)(4)(i) of this section.

13.06.01-29

Physical Security Plan, Page 30, Section 15.4, 5th paragraph: Please clarify for consistency with "alarm station operator" responsibilities stated on page 5, section 4.1 of the North Anna PSP.

Regulatory Basis: 10 CFR 73.55(i)(4)(ii)(B). Continuously staff each alarm station with at least one trained and qualified alarm station operator. The alarm station operator must not be assigned other duties or responsibilities which would interfere with the ability to execute the functions described in § 73.55(i)(4)(i) of this section.

13.06.01-30

Appendix C, Safeguards Contingency Plan, Page C-20, Section 4.5, 4th paragraph: Please clarify the purpose of this "Note:" as it applies to North Anna Unit #3 position titles. Are position titles identified in site procedures?

Regulatory Basis: 10 CFR 73.55(c)(7)(ii). "Implementing procedures must document the structure of the security organization and detail the types of duties, responsibilities, actions, and decisions to be performed or made by each position of the security organization."