

PMLevyCOLPEm Resource

From: Anderson, Brian
Sent: Monday, August 31, 2009 12:19 PM
To: robert.kitchen@pgnmail.com; david.waters@pgnmail.com; tillie.wilkins@pgnmail.com
Cc: PMLevyCOLPEm Resource
Subject: DRAFT RAIs - SRP section 13.6 - Levy County Units 1 and 2 Combined License Application
Attachments: LNP Draft RAI 3420 - 13.6.doc; LNP Draft RAI 3411 - 13.6.doc; LNP Draft RAI 3413 - 13.6.doc; LNP Draft RAI 3414 - 13.6.doc; LNP Draft RAI 3418 - 13.6.doc

Importance: High

Attached are five draft RAIs related to SRP section 13.6 for the Levy County Units 1 and 2 Combined License Application. Please let me know if you would like to schedule a conference call to discuss these RAIs.

Thank you,
Brian

Brian Anderson
301-415-9967
Lead Project Manager, AP1000 Projects Branch 1
Office of New Reactors
U.S. Nuclear Regulatory Commission

Hearing Identifier: Levy_County_COL_Public
Email Number: 422

Mail Envelope Properties (CB87FC66F95637428C5E0D066E756B6FC056181E1A)

Subject: DRAFT RAIs - SRP section 13.6 - Levy County Units 1 and 2 Combined License
Application
Sent Date: 8/31/2009 12:18:31 PM
Received Date: 8/31/2009 12:18:33 PM
From: Anderson, Brian

Created By: Brian.Anderson@nrc.gov

Recipients:

"PMLevyCOLPEm Resource" <PMLevyCOLPEm.Resource@nrc.gov>
Tracking Status: None
"robert.kitchen@pgnmail.com" <robert.kitchen@pgnmail.com>
Tracking Status: None
"david.waters@pgnmail.com" <david.waters@pgnmail.com>
Tracking Status: None
"tillie.wilkins@pgnmail.com" <tillie.wilkins@pgnmail.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	399	8/31/2009 12:18:33 PM
LNP Draft RAI 3420 - 13.6.doc		33786
LNP Draft RAI 3411 - 13.6.doc		31226
LNP Draft RAI 3413 - 13.6.doc		31738
LNP Draft RAI 3414 - 13.6.doc		32762
LNP Draft RAI 3418 - 13.6.doc		32762

Options

Priority: High
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Request for Additional Information No. 3420
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 13.06 - Physical Security
Application Section: Physical Security

QUESTIONS for Reactor Security and Programs Branch (NSIR/DRP/RSPLB)

13.06-***

Physical Security Plan, (Revision 01, Dated, April 1 2009), Section 15.3, Page 20. Please address whether the secondary power supply systems located inside a vital area applies to the entire IDS and is not limited to only alarm annunciation equipment and non-portable communication equipment.

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-***

Regarding Physical Security Plan, Section 9, please clarify the statement "Security Officers are properly equipped with weapons and equipment..." Page 5 of the PSP does not appear to include the title "security officer." However, "Armed Security Officer" and "Unarmed individuals" are defined. Please clarify whether all "Security Officers" are 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-***

Appendix B Training and Qualification Plan, Section 2.4, refers to the phrase Physical Performance Test. Please describe how the Physical Performance Test differs from the Physical Fitness Test. In addition, please provide a general description of the Physical Fitness Test (Critical Task 22) to be used, including how the physical fitness test will measure strength, endurance and agility.

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-***

Physical Security Plan, Section 11.2.2. Please describe the location of secondary power for active vehicle barriers and describe how this back-up power source is protected to ensure 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-***

Physical Security Plan, Section 11.4 does not appear to describe if the secondary alarm station shall be equal and redundant. Please clarify whether the secondary alarm station shall be equal and redundant.

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.

10 CFR 73.55(e)(9)(v)(D) 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; (D) The secondary alarm station in accordance with § 73.55(i)(4)(iii).

Request for Additional Information No. 3411
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 13.06 - Physical Security
Application Section: Physical Security

QUESTIONS for Reactor Security and Programs Branch (NSIR/DRP/RSPLB)

13.06-***

The Physical Security Plan (Revision 01, Dated, April 1 2009), makes reference to over 61 Facility/Site Procedures, plans, implemented controls, and letters of agreement. Please describe the process that is being used to track the development of these documents and their implementation.

Regulatory Basis: 10 CFR 73.55(a) (3) The licensee is responsible for maintaining the onsite physical protection program in accordance with Commission regulations through the implementation of security plans and written security implementing procedures. 10 CFR 73.55(a)(4). 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 implement the requirements of this section before fuel is allowed onsite (protected area).

13.06-***

Physical Security Plan, (Revision 01, Dated, April 1 2009), section 8, Page 5. As described in NEI 03-12, rev #6, please provide additional information on response protocols for other response organizations and documentation for current agreements with Law enforcement agencies.

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-***

Physical Security Plan, Section 11.2.1. Please provide additional description of natural terrain features that make-up portions of the outer VBS and provide reference to the criteria used to determine its acceptability and stand-off distances. If applicable, this additional information should be incorporated in the Facility Physical Layout Drawing.

Regulatory Basis: 10 CFR 73.55, Appendix C Section II, Paragraph B(3)(b). Plans must also include a description and map of the site in relation to nearby town, 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.

Request for Additional Information No. 3413
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 13.06 - Physical Security
Application Section: Physical Security

QUESTIONS for Reactor Security and Programs Branch (NSIR/DRP/RSPLB)

13.06-***

Physical Security Plan, (Revision 01, Dated, April 1 2009), section 4.1, Page 4, paragraphs 9. Please provide clarification on the duties, responsibilities and training requirements for Supervisor-Security Shift and qualified Sergeant. Describe what duty position the Sergeant fulfills as listed in Appendix B Training and Qualification Plan, Table 1, and Appendix C section 4.1.2.

Regulatory Basis: 10 CFR 73.55(d)(2)(ii). At least one member, onsite and available at all times, who has the authority to direct the activities of the security organization and who is assigned no other duties that would interfere with this individual's ability to perform these duties in accordance with the security plans and the licensee protective strategy.

13.06-***

Regarding Physical Security Plan, (Revision 01, Dated, April 1 2009), Appendix C, Safeguards Contingency Plan, Section 4.1.1, Page C-17, and section 4.1.2, page C-18, the Duty position Security Force Supervisor (RTL) does not appear to be described in the Physical Security Plan, section 4.1, Page 4. Please clarify the duties, responsibilities and training requirements for this position. Please clarify whether this position conflicts with the duties, responsibilities and training requirements for the Armed Response Team Leader (RTL) and the Security Shift Supervisor (SSS). In addition, please clarify the apparent inconsistency of this position description with Appendix B, Section 3.3 and Table 1- Critical Task Matrix.

Regulatory Basis: 10 CFR 73.55 (d)(3) The licensee may not permit any individual to implement any part of the physical protection program unless the individual has been trained, equipped, and qualified to perform their assigned duties and responsibilities in accordance with appendix B to this part and the Training and Qualification Plan.

13.06-***

Physical Security Plan, (Revision 01, Dated, April 1 2009), section 15.4, Page 21. Please provide clarification on the duties, responsibilities and training requirements for Nuclear Shift Manager. This position does not appear to be listed in Section 4.1, Appendix B Training and Qualification Plan, Table 1, Appendix C, Safeguards Contingency Plan, Section 4.1.1, Page C-17, and section 4.1.2, page C-18.

Regulatory Basis: 10 CFR 73.55(d)(2)(ii). At least one member, onsite and available at all times, who has the authority to direct the activities of the security organization and who is assigned no other duties that would interfere with this individual's ability to perform these duties in accordance with the security plans and the licensee protective strategy.

DRAFT

Request for Additional Information No. 3414
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 13.06 - Physical Security
Application Section: Physical Security

QUESTIONS for Reactor Security and Programs Branch (NSIR/DRP/RSPLB)

13.06-***

Physical Security Plan, (Revision 01, Dated, April 1 2009), Section 14.2.1, Page 14, 2nd paragraph. The term inspection is inconsistent with Appendix B Training and Qualification Plan, Page B16, Table 15, Task 6. In addition, the items listed as being searched for is inconsistent with Appendix A, Terms and Acronyms definition for contraband. Please explain these inconsistencies.

10 CFR 73.55(h) *Search programs.* (1) The objective of the search program is to detect, deter, and prevent the introduction of firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage. To accomplish this, the licensee shall search individuals, vehicles, and materials consistent with the physical protection program design requirements in paragraph (b) of this section, and the function to be performed at each access control point or portal before granting access.

13.06-***

The Physical Security Plan Section 14.1 contains a commitment to adopting Regulatory Guide 5.66. Section C in revision 1 of RG 5.66 states:

“Licensees who adopt this regulatory guide should include the following statement in their physical security plans:

All elements of Regulatory Guide 5.66, Revision 1, have been implemented to satisfy the requirements of 10 CFR 73.56 and 10 CFR Part 26 related to unescorted access and unescorted access authorization.”

The PSP does not appear to contain the above statement. Please provide this additional information, or justify its exclusion.

Regulatory Basis: 10 CFR 73.55(b) (7) The licensee shall establish, maintain, and implement an access authorization program in accordance with § 73.56 and shall describe the program in the Physical Security Plan.

13.06-***

Physical Security Plan, Section 14.5, does not appear to describe how the minimum vital areas and equipment are protected. Please clarify how the minimum vital areas and equipment are protected, including any proposed revision to this section of the security plan.

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).

13.06-***

Physical Security Plan Section 11.3. Please describe the measures 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 and buildings whose walls and roofs comprise a portion of the PA.

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(e)(7)(ii). Obstructions that could prevent the licensee's capability to meet the observation and assessment requirements of this section must be located outside of the isolation zone.

DRAFT

Request for Additional Information No. 3418
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 13.06 - Physical Security
Application Section: Physical Security

QUESTIONS for Reactor Security and Programs Branch (NSIR/DRP/RSPLB)

13.06-***

Physical Security Plan, (Revision 01, Dated, April 1 2009), Page vii. Table of Contents does not appear to provide a reference and page number location for Table 1- Critical Task Matrix. Please provide this information, or justify its exclusion.

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

13.06-***

Physical Security Plan, Section 14.2, does not appear to address the methodology and frequency chosen to monitor and/or patrol the spent fuel pool. Please address the methodology and frequency chosen to monitor and/or patrol the spent fuel pool including 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-***

Regarding Physical Security Plan, Section 15.4, please clarify the relationship between this video assessment equipment and the fixed and non-fixed cameras and surveillance systems equipment identified in Sections 15.1 and 15.2 of the PSP. Describe how the real time video play-back recorder captures activities before and after each alarm annunciation.

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.

10 CFR 73.55(e)(7)(i) An isolation zone must be maintained in outdoor areas adjacent to the protected area perimeter barrier. The isolation zone shall be:

(C) Monitored with assessment equipment designed to satisfy the requirements of § 73.55(i) and provide real-time and play-back/recorded video images of the detected activities before and after each alarm annunciation.

DRAFT