

PMSummerColpEM Resource

From: Anderson, Brian
Sent: Tuesday, September 15, 2009 12:01 PM
To: PMSummerColpEM Resource
Cc: Patel, Chandu; Anderson, Brian
Subject: Conference Call Summary - September 3, 2009 - SCE&G VC Summer COLA - Draft RAIs related to SRP Section 13.6

Importance: High

MEMORANDUM TO: File (Docket Numbers 52-027, 52-028, VC Summer Units 2 and 3 COLA)

FROM: Brian Anderson
Office of New Reactors, Division of New Reactor Licensing
Project Manager, AP1000 Projects Branch 1

SUBJECT: Summary of Conference Call with Applicant on September 3, 2009

On September 3, 2009, NRC staff participated in a telephone conference call with South Carolina Electric & Gas (SCE&G) and AP1000 DCWG representatives (see list below) regarding the staff's detailed review of the VC Summer Units 2 and 3 COLA. The purpose of the call was to discuss a draft RAIs (electronic-RAI (e-RAIs) ID # 3434, 3436, 3437, 3438, 3441) related to the physical security plan. Following review by Office of General Counsel, SCE&G was provided a draft copies of e-RAI # 3434, 3436, 3437, 3438, 3441 via e-mail on August 27, 2009.

The conference call discussion focused on various aspects of the applicant's physical security plan. As a result of the conference call discussion, six draft RAI questions were deleted before the final RAI letter was issued.

RAI 3434, draft question # 4 stated:

"Physical Security Plan, Section 15.1, paragraph 3. Identify the type of lighting that VCSNS Units 2 and 3 has that is sufficient to execute the plant defensive strategy. Please clarify whether this lighting will meet the 0.2 footcandle requirements.

Regulatory Basis: 10 CFR 73.55(i)(6)(ii) The licensee shall provide a minimum illumination level of 0.2 footcandles, 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."

RAI 3436, draft question # 3 stated:

"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."

RAI 3441, draft question # 5 stated:

"Physical Security Plan, Section 14.4.1, Page 15, paragraph 3. Please clarify what barrier is being discussed in this paragraph. Is this barrier the final access point? Clarify what is meant by "For each vehicle barrier access control point." How many barriers do VCSNS Units 2 and 3 have? Please clarify in the appropriate sections. If this is the final barrier, explain the search process.

Regulatory Basis: 10 CFR 73.55(h)(3) Protected area searches. Licensees shall search all personnel, vehicles and materials requesting access to protected areas. 10 CFR 73.55(h)(3)(i) The search for firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage shall be accomplished through the use of equipment capable of detecting these items, or through visual and physical searches, or both, to ensure that all items are clearly identified before granting access to protected areas."

As a result of the conference call discussion, the NRC staff determined that these three draft questions above did not need to be issued because the applicant's physical security plan sufficiently describes the lighting, physical performance test, and barrier described in section 14 of the PSP.

RAI 3438, draft question # 2 stated:

"Physical Security Plan, Section 15.4, Page 22, paragraph 4. Please clarify the locations for the CAS & SAS for VCSNS Unit 2 and 3. Please explain how the requirement for a redundant CAS and SAS will be met (e.g. a new CAS and new SAS will be designed and constructed to be redundant, and will be designed and located to protect against a single act). In addition, please describe how the requirement that an alarm station operator cannot change the status of a detection point or deactivate a locking or access control device at a protected or vital area portal, without the knowledge and concurrence of the alarm station operator in the other alarm station, will be satisfied.

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. 73.55(i)(4)(ii) Licensees shall: (A) Locate the central alarm station inside a protected area. The interior of the central alarm station must not be visible from the perimeter of the protected area. . . . (F) Ensure that an alarm station operator cannot change the status of a detection point or deactivate a locking or access control device at a protected or vital area portal, without the knowledge and concurrence of the alarm station operator in the other alarm station."

RAI 3438, draft question # 3 stated:

"Physical Security Plan, Section 16.2, Page 24, paragraph 1. Revise to address SAS at VCSNS Unit 2 and 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."

RAI 3441, draft question # 7 stated:

"Physical Security Plan, Section 11.2.2, Page 9, paragraph 2. Provide a general description of how VCSNS Units 2 and 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.

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."

As a result of the conference call discussion, the NRC staff determined that these three draft questions above did not need to be issued because the applicant's physical security plan sufficiently describes the requirements for CAS and SAS described in the draft RAI questions. However, the NRC staff informed the applicant that reviews in this area are still ongoing, and that additional questions related to CAS and SAS could be issued at a future date.

Following the conference call, the NRC staff informed SCE&G that e-RAIs # 3434, 3436, 3437, 3438, 3441 would be issued without additional changes.

The NRC attendees were:

Brian Anderson
Jack Frost
Pete Prescott
Judy Johnson
Dennis Gordon

SCE&G attendees were:

Jerry Harrison, SCE&G
Julie Giles, SCE&G
Rob Philon, SCE&G
Neil Haggerty, NuStart
Jerry Sims, consultant
Tony Jackson, Duke
Dick Sweigart, Duke
A.D. Barginere, Progress Energy
Tom Spink, TVA
Roger Reynolds, TVA
Dave Godshalk, Enercon
Wes Sparkman, SNC
Amy Aughtman, SNC
Steve Shipman, SNC

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