

## PMVogtleCOLPEm Resource

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**From:** Anderson, Brian  
**Sent:** Tuesday, August 25, 2009 12:21 PM  
**To:** 'agaughtm@southernco.com'; 'wasparkm@southernco.com'; Neil Haggerty  
**Cc:** VogtleCOL Resource; Joshi, Ravindra  
**Subject:** DRAFT - RAI 3384 - SRP section 13.6 - Vogtle Units 3 and 4 Combined License Application  
**Attachments:** VOG Draft RAI 3384 - 13.6.doc

**Importance:** High

Attached is a draft RAI related to SRP section 13.6 for the Vogtle Units 3 and 4 Combined License Application. Please let me know if you would like to schedule a conference call to discuss this RAI.

Thank you,  
Brian

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Application  
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**Request for Additional Information No. 3384**  
**Vogle**  
**Southern Nuclear Operating Co.**  
**Docket No. 52-0025 and 52-0026**  
**SRP Section: 13.06 - Physical Security**  
**Application Section: 13.6 Physical Security**

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

13.06-\*\*\*

The Physical Security Plan (revision 1) dated March 31, 2009 makes reference to over 61 Facility/Site Procedures, plans, implemented Controls, and Letter 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 1) dated March 31, 2009, Section 11.2.1, Page 10. 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. Explain the process to development the VBS and guidance for the design. (RG 5.76 or NUREG 6190). Explain that stand-off distance for Units 3 & 4 has been analyzed to ensure there are no negative effects on the equipment needed for Units 1 & 2.

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-\*\*\*

Physical Security Plan, (revision 1) dated March 31, 2009, Section 11.3, Page 13. Describe which of the three options identified is or will be established to prevent an unauthorized train from penetrating the protected area boundary. Also describe the frequency of surveillance measures, and the implementing process.

Regulatory Basis: 10 CFR 73.55(e)(10)(i)(D) area, install a train derailer, remove a section of track, or restrict access to railroad sidings and provide periodic surveillance of these measures.

13.06-\*\*\*

Physical Security Plan, (revision 1) dated March 31, 2009, Section 14.4.5, Page 22. Please provide clarification of the phrase “normally manned by” as it relates to staffing at the Primary Access Point. Please include in this description the minimum number of staff for each post within the Primary Access Point.

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.

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.

13.06-\*\*\*

Physical Security Plan, (revision 1) dated March 31, 2009, section 14.4.1., Pages 19. Please provide clarification for the search process, immediate response and the surveillance of searched vehicles. This information should provide a clear task ownership and describe the tasks performed by each officer, at each location.

Regulatory Basis: 73.55(h)(2)(iii) specifies implementing details for the conduct of vehicle searches within the OCA including the number of personnel required and the duties to be performed by each. The search process applied in the OCA must be performed by two personnel at least one of which must be armed and positioned to observe the search to provide an immediate response if needed. The rule requirement for searches conducted at vehicle checkpoints within the OCA is that one individual will conduct the search function, a second armed individual will be physically located at the checkpoint to provide an immediate armed response if needed, and a third individual, in accordance with § 73.55(h)(2)(v), will monitor the search function via video equipment at a location from which that individual can initiate an additional response.

10 CFR 73.55(h)(2)(iii) Vehicle searches must be performed by at least two (2) trained and equipped security personnel, one of which must be armed. The armed individual shall be positioned to observe the search process and provide immediate response.

10 CFR 73.55(h)(2)(v): Vehicle access control points must be equipped with video surveillance equipment that is monitored by an individual capable of initiating a response.