

LeeRAIsPEm Resource

From: Hughes, Brian
Sent: Tuesday, October 06, 2009 11:38 AM
To: LeeRAIsPEm Resource
Subject: RAI Letter 079 SRP 13.6 for W.S. Lee units 1 and 2 Cola
Attachments: LEE-RAI-LTR-079.doc

Brian Hughes
Senior Project Manager
NRO/DNRL/NWE1
US NRC
301-415-6582

Hearing Identifier: Lee_COL_RAI
Email Number: 93

Mail Envelope Properties (3D388D66E29B124A910BAC867C3A359D2277852C16)

Subject: RAI Letter 079 SRP 13.6 for W.S. Lee units 1 and 2 Cola
Sent Date: 10/6/2009 11:37:32 AM
Received Date: 10/6/2009 11:37:34 AM
From: Hughes, Brian

Created By: Brian.Hughes@nrc.gov

Recipients:
"LeeRAIsPEm Resource" <LeeRAIsPEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	103	10/6/2009 11:37:34 AM
LEE-RAI-LTR-079.doc	118778	

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

P.Hastings

October 6, 2009

Mr. Peter S. Hastings, P.E.
Licensing Manager, Nuclear Plant Development
Duke Energy
526 South Church Street
Charlotte, NC 28201-1006

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 079 RELATED TO
SRP SECTION: 13.6 PHYSICAL SECURITY FOR THE WILLIAM STATES LEE III UNITS
AND 2 COMBINED LICENSE APPLICATION

Dear Mr. Hastings:

By letter dated December 12, 2007, as supplemented by letters dated January 28, 2008, February 6, 2008 and February 8, 2008, Duke Energy submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advance passive pressurized water reactors pursuant to 10 CFR Part 52. The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

P.Hastings

If you have any questions or comments concerning this matter, you may contact me at 301-415-6582.

Sincerely,

/RA/

Brian Hughes, Senior Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-018
52-019

Enclosure:
Request for Additional Information

CC: see next page

P.Hastings

If you have any questions or comments concerning this matter, you may contact me at 301-415-6582.

Sincerely,

/RA/

Brian Hughes, Senior Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-018
52-019

eRAI Tracking No. 3528,3536, 3537, 3539,
3540,3542,3543,3545

Enclosure:
Request for Additional Information

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DATE	08/13/2009	08/15/2009	09/01/2009	10/06/2009

*Approval captured electronically in the electronic RAI system.

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Request for Additional Information No. 3528 Revision 1

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-***

Physical Security Plan, Page 1, Section 1.1. Figure 1 is not of sufficient size/magnification or detail to clearly identify or discern the appropriate information such as OCA boundary, PA perimeter boundary, Vehicle Barrier System (to include natural terrain features). Figure 2 is not of sufficient size/magnification or detail to clearly identify or discern the local roads described in this section. As required by 10 CFR Part 73, Appendix C, clarify the applicability of railroads, airports, pipelines, hazardous material facilities, and pertinent environmental features to the Lee facility. If applicable, provide figures of sufficient size to detail these features, or justify their exclusion.

Please reference the criteria used to determine stand-off distances as well as the acceptability of natural terrain features as a component of the VBS. Confirm that only steep terrain was analyzed and determined to be adequate or, if applicable, address other applicable natural terrain features such as trees, wetlands, rocks, etc. If applicable, these areas should be identified in the Facility Physical Layout Drawing.

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-***

Physical Security Plan, Page 1, Section 1.1.

The term "Red Zone Fence" is not defined in Appendix A to the PSP. Please clarify the purpose/function of this physical protection program component.

The term "Exclusion Area" is not defined in Appendix A to the PSP. Please clarify the meaning/purpose of this term and how the exclusion area is incorporated into the onsite physical protection program.

Regulatory Basis.

10 CFR Part 73.55(c)(1)(i) "Licensee security plans must describe how the licensee will implement requirements of this section through the establishment and maintenance of a security organization, the use of security equipment and technology,"

10 CFR Part 73.55(c)(1)(ii) "Licensee security plans must describe site-specific conditions that affect how the licensee implements Commission requirements."

13.06-***

Physical Security Plan, Page 38, Section 21, 3rd paragraph.

Please clarify the statement "The title of this section is 'Compensatory Measures.'"

Please describe the relationship between the location of the proposed ISFSI being inside the PA and Compensatory Measures? Also, please clarify if the ISFSI, to include ISFSI security plan, is intended to be included as part of this application.

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-***

Appendix C, Safeguards Contingency Plan, Page C-19, Section 4.2. The site maps (figures) of this section do not clearly identify necessary information.

Similarly, section 1.1 of PSP does not clearly describe the required site-specific physical layout. Please provide this information or justify its exclusion.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.b. "Physical Layout".

The safeguards contingency plan must include a site map depicting the physical structures located on the site, including onsite independent spent fuel storage installations, and a description of the structures depicted on the map. 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. Descriptions and maps must indicate main and alternate entry routes for law enforcement or other offsite response and support agencies and the location for marshaling and coordinating response activities.

Request for Additional Information No. 3536 Revision 1

10/5/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security

Application Section: 13.6

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

13.06-9

Physical Security Plan, Page 24, Section 14.5, 1st paragraph. Confirm that the phrase "accepted industry standard" as used in this section of the PSP is the same as that specified by the DCD or identify any differences and provide the basis for such changes.

Regulatory Basis.

10 CFR 73.55(e)(9)(i). Vital equipment must be located only within vital areas, which must be located within a protected area so that access to vital equipment requires passage through at least two physical barriers, except as otherwise approved by the Commission and identified in the security plans.

10 CFR 73.55(e)(9)(ii). The licensee shall protect all vital area access portals and vital area emergency exits with intrusion detection equipment and locking devices that allow rapid egress during an emergency and satisfy the vital area entry control requirements of this section.

10 CFR 73.55(e)(9)(iii). Unoccupied vital areas must be locked and alarmed.

13.06-10

Physical Security Plan, Page 25, Section 14.5, 5th paragraph. Please clarify, by position title, the person within the security organization that will have the authority to direct implementation of the "override" capability identified in this paragraph and describe the performance criteria to be met by the "appropriate compensatory measures" prior to implementing this action. Also, describe the measures taken to prevent the unauthorized use of and/or access to "circuit interrupters" or delete this detail.

Regulatory Basis.

10 CFR 73.55(e)(9)(ii). The licensee shall protect all vital area access portals and vital area emergency exits with intrusion detection equipment and locking devices that allow rapid egress during an emergency and satisfy the vital area entry control requirements of this section.

10 CFR 73.55(e)(9)(iii). Unoccupied vital areas must be locked and alarmed.

13.06-11

Physical Security Plan, Page 25, Section 14.5.

6th paragraph, bullet (b) - Please clarify if manual logging is accomplished through Access Authorization Lists.

7th paragraph, bullet (a) - Please clarify where the status/position of locked/unlocked vital area doors is displayed/provided.

Regulatory Basis.

10 CFR 73.56(j) Access to vital areas. Licensees or applicants shall establish, implement, and maintain a list of individuals who are authorized to have unescorted access to specific nuclear power plant vital areas during non-emergency conditions. The

list must include only those individuals who have a continued need for access to those specific vital areas in order to perform their duties and responsibilities. The list must be approved by a cognizant licensee or applicant manager or supervisor who is responsible for directing the work activities of the individual who is granted unescorted access to each vital area, and updated and re-approved no less frequently than every 31 days. 10 CFR 73.55(e)(9)(ii). The licensee shall protect all vital area access portals and vital area emergency exits with intrusion detection equipment and locking devices that allow rapid egress during an emergency and satisfy the vital area entry control requirements of this section. 10 CFR 73.55(e)(9)(iii). Unoccupied vital areas must be locked and alarmed.

Request for Additional Information No. 3537 Revision 1

10/5/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-7

Physical Security Plan, Page 27, Section 15.1, 5th paragraph does not appear to describe illumination capabilities of patrol personnel. Please clarify that security patrol personnel will be provided low-light technology in areas with less than 0.2 footcandle illumination.

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 low-light technology..."

13.06-8

Physical Security Plan, Page 28, Section 15.3, paragraph (a). Please clarify the location in which the subject IDS is installed (i.e., "Isolation Zone") and clarify how detection of attempted and/or actual penetration is accomplished external to the PA at the PAP. Verify the the PAP is located outside or concurrent with the PA perimeter consistent with 10 CFR 73.55(g)(1)(i)(A). In addition, please clarify the intent of the second paragraph. Describe whether the IDS at the PA perimeter is provided with an uninterruptable power source (UPS) and clarify the statement "commensurate with its role in the protective strategy".

Regulatory Basis.

10 CFR 73.55(g)(1)(i)(A). Locate access control portals outside of, or concurrent with, the physical barrier system through which it controls access.

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(i)(3)(vii) Ensure intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

Request for Additional Information No. 3539 Revision 1

10/5/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-5

Physical Security Plan, Page 30, Section 15.5.1, 2nd paragraph, sub-paragraphs #2 & #3. Please provide a general description of the term "periodically" and a general description of the remote location from which monitoring by security personnel will be performed to include the associated communication methods available to the subject security personnel for calling for assistance or initiating a response if needed. This section of the PSP discusses actions to be taken upon detection of unauthorized activities in the OCA, but states that monitored surveillance is periodic. Please clarify whether, upon detection, monitored surveillance (CCTV) will be used to track the detected activity or if it will continue to be only periodic.

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 the use of video technology, or by a combination of both.

13.06-6

Physical Security Plan, Page 32, Section 16.2, 1st & 2nd paragraphs appear to be inconsistent. The 1st paragraph states that a conventional (hard-wired) telephone system is used and the 2nd paragraph states that "conventional cellular wireless devices" is used along with radios. Please clarify the type of telephone system used or if the "cellular wireless" type is a third option that could be used if the hard-wire telephone and radio systems are not functioning.

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(j)(4). The following continuous communication capabilities must terminate in both alarm stations required by this section:

10 CFR 73.55(j)(4)(i). Radio or microwave transmitted two-way voice communication, either directly or through an intermediary, in addition to conventional telephone service between local law enforcement authorities and the site.

Request for Additional Information No. 3540 Revision 1

10/6/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-33

Physical Security Plan, Page 32, Section 16.2, 3rd paragraph appears to have inappropriately retained {bracketed text} from the security plan template in lieu of replacing this text with site-specific information. Specify other security personnel (by title/position) designated as necessary to effectively implement the site protective strategy.

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.

13.06-34

Physical Security Plan, Page 34, Section 18, 2nd paragraph, 5th sentence. Please clarify the duties and responsibilities assigned to "Armed Responders." Appendix A to the PSP indicates that armed responders must be available at all times inside the PA. However, the statement contained in parenthesis regarding performance of duties in the OCA (section 15.5.1 of the PSP) is not applicable to armed responders. Please clarify this apparent discrepancy.

Regulatory Basis.

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.

Request for Additional Information No. 3542 Revision 1

10/6/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-32

Appendix B Training and Qualification Plan, Page B-5, Section 2.4, 2nd paragraph, 5th and 6th bullets. The description provided does not address how "agility" will be demonstrated. Generally, agility can be demonstrated by an individual through performing tactical movements through an area containing obstacles similar those that would be encountered during a response at the proposed site. Please provide a general description of the physical fitness test to be used to determine "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.

Request for Additional Information No. 3543 Revision 1

10/6/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-24

Appendix C, Safeguards Contingency Plan, Page C-21, Section 4.5, 4th paragraph references a note. Please clarify this note as it relates to site-specific position titles.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.a. Organizational Structure. The safeguards contingency plan must describe the organization's chain of command and delegation of authority during safeguards contingency events, to include a general description of how command and control functions will be coordinated and maintained.

13.06-25

Appendix C, Safeguards Contingency Plan, Page C-22, Section 5.2, 1st paragraph. Please clarify what is meant by the words "as described later" at the end of the last sentence. Please provide a direct reference to where this information can be found.

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.

Request for Additional Information No. 3545 Revision 1

10/6/2009

William States Lee III, Units 1 and 2
Duke Energy Carolinas, LLC
Docket No. 52-018 and 52-019
SRP Section: 13.06 - Physical Security
Application Section: 13.6

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

13.06-26

Appendix C, Safeguards Contingency Plan, Page C-26, Section 8. The 3rd paragraph appears to inappropriately equate defense-in-depth to the site protective strategy. The intent of this section is to describe how the components of the physical protection program are coordinated/integrated into a comprehensive program that results in defense-in-depth. This paragraph uses the term "formidable" to describe barriers. Physical barriers must be designed, constructed, and installed as needed to perform a specific function within the physical protection program. The need for a specific function is determined by each applicant based on the site-specific analysis required by 10 CFR 73.55(b)(4). The term "formidable" does not describe the construction standard for physical barriers relative to the function each is intended to perform. Please describe the types of physical barriers, the functions to be performed by each barrier/barrier system, and the general construction standards for each.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.c. Safeguards Systems. The safeguards contingency plan must include a description of the physical security systems that support and influence how the licensee will respond to an event in accordance with the design basis threat described in § 73.1(a). The licensee's description shall begin with onsite physical protection measures implemented at the outermost facility perimeter, and must move inward through those measures implemented to protect target set equipment.

(i) Physical security systems and security systems hardware to be discussed include security systems and measures that provide defense in depth, such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

(ii) The specific structure of the security response organization to include the total number of armed responders and armed security officers documented in the approved security plans as a component of the protective strategy and a general description of response capabilities shall also be included in the safeguards contingency plan.

13.06-27

Appendix C, Safeguards Contingency Plan, Page C-26, Section 8. The 4th paragraph, last sentence uses the term "critical" target sets. The requirement for the development/identification of target sets as stated in 10 CFR 73.55(f) does not categorize target sets as critical or not critical. Please clarify the meaning of the term "critical" as used in the 4th paragraph.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.c. Safeguards Systems. The safeguards contingency plan must include a description of the physical security systems that support and influence how the licensee will respond to an event in accordance with the design basis threat described in § 73.1(a). The licensee's description shall begin with onsite physical protection measures implemented at the outermost facility perimeter, and must move inward through those measures implemented to protect target set equipment.

(i) Physical security systems and security systems hardware to be discussed include security systems and measures that provide defense in depth, such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

(ii) The specific structure of the security response organization to include the total number of armed responders and armed security officers documented in the approved security plans as a component of the protective strategy and a general description of response capabilities shall also be included in the safeguards contingency plan.

13.06-28

Appendix C, Safeguards Contingency Plan, Page C-26, Section 8. As written in the 7th paragraph, please clarify the term "vehicles." It appears that this paragraph is addressing "land" vehicles only and is not addressing waterborne vehicles. Please clarify what types of vehicles are being addressed in this paragraph. In addition, please describe "how" the site-specific features are used to route vehicles to roads through use of the examples provided. This paragraph also introduces the use of an OCA

checkpoint, which does not appear to be discussed elsewhere in the PSP. Please clarify the location of the OCA checkpoint and clarify its function within the physical protection program, specifically its relationship to the VBS described in the PSP Section 11.2.

The 8th paragraph of this section identifies an "Exclusion Area." Please describe how this exclusion area is used in relation to the OCA, PA, and VAs. In addition, please clarify the role of "armed responders" for monitoring the OCA checkpoint.

The 9th paragraph of this section identifies "the main entrance road." Please clarify this term, including a description of whether this main entrance road is the same as the OCA checkpoint introduced in the 7th paragraph.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.c. Safeguards Systems.

The safeguards contingency plan must include a description of the physical security systems that support and influence how the licensee will respond to an event in accordance with the design basis threat described in § 73.1(a). The licensee's description shall begin with onsite physical protection measures implemented at the outermost facility perimeter, and must move inward through those measures implemented to protect target set equipment.

(i) Physical security systems and security systems hardware to be discussed include security systems and measures that provide defense in depth, such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

(ii) The specific structure of the security response organization to include the total number of armed responders and armed security officers documented in the approved security plans as a component of the protective strategy and a general description of response capabilities shall also be included in the safeguards contingency plan.

13.06-29

Appendix C, Safeguards Contingency Plan, Page C-26, Section 8. In the 12th paragraph, 1st sentence, please clarify if the identified VBS in the OCA is adjacent to the Isolation Zone, at the PA perimeter, or is located elsewhere within the OCA. Describe or reference the criteria used to determine if VBS components, to include both natural and/or engineered/man-made structures satisfy NRC requirements. This discussion should also address the applicability of the DBT waterborne vehicle bomb and whether measures are in place to detect and assess threats that may be directed from waterways.

As described in the 13th paragraph of this section, please identify the primary power source for this active barrier, what type of back-up power is used, and how the back-up power is protected to ensure its availability. In addition, the 13th paragraph does not appear to identify search as a process prior to granting vehicle access. Please provide this information, or justify its exclusion.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.c. Safeguards Systems.

The safeguards contingency plan must include a description of the physical security systems that support and influence how the licensee will respond to an event in

accordance with the design basis threat described in § 73.1(a). The licensee's description shall begin with onsite physical protection measures implemented at the outermost facility perimeter, and must move inward through those measures implemented to protect target set equipment.

(i) Physical security systems and security systems hardware to be discussed include security systems and measures that provide defense in depth, such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

(ii) The specific structure of the security response organization to include the total number of armed responders and armed security officers documented in the approved security plans as a component of the protective strategy and a general description of response capabilities shall also be included in the safeguards contingency plan.

13.06-30

Appendix C, Safeguards Contingency Plan, Page C-26, Section 8.

The 14th paragraph refers to an Integrated Response Plan but does not describe command and control protocols or communication methodologies to be used to implement this plan. Please provide this information or justify its exclusion.

In the 15th paragraph, please clarify what is meant by the phrase "strategically located" and identify the general facility area(s) (OCA and/or PA) in which these delay fences, razor-wire, and other structures are used. Clarify whether these features are identified in the site protective strategy and are needed to facilitate an effective response. In addition, please clarify what is meant by the term "key" target-set components.

In the 16th paragraph of this section, please clarify what is meant by the term "formidable" barrier system. Please describe the general construction and function of the "formidable" barrier system. Please clarify if the phrase "vital area equipment" is the same as vital equipment. Clarify the fields of fire for armed responders relative to VAS, specifically, is the field of fire limited to only the VA access portal or does it encompass the entire vital area. Clarify the types of controls (i.e., card readers, biometric systems, combination locks, key locks, access lists, etc.) used to limit access to only authorized personnel. Clarify the term "substantial" barriers and provide a general description of the types of barriers used, general construction standard, and the function the barrier is to perform. Please clarify the term "critical" VA areas. Clarify the intent/purpose of the 6th sentence relative to the statement that the VA barrier must be breached before this area can be reached...". Clarify what "normal" industrial lighting is. Lighting must be sufficient to facilitate detection, assessment, and response in accordance with site procedures. Clarify where door alarms annunciate and who initiates response to an alarm annunciation.

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.c. Safeguards Systems.

The safeguards contingency plan must include a description of the physical security systems that support and influence how the licensee will respond to an event in accordance with the design basis threat described in § 73.1(a). The licensee's description shall begin with onsite physical protection measures implemented at the

outermost facility perimeter, and must move inward through those measures implemented to protect target set equipment.

(i) Physical security systems and security systems hardware to be discussed include security systems and measures that provide defense in depth, such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

(ii) The specific structure of the security response organization to include the total number of armed responders and armed security officers documented in the approved security plans as a component of the protective strategy and a general description of response capabilities shall also be included in the safeguards contingency plan.

13.06-31

Appendix C, Safeguards Contingency Plan, Page C-26, Section 8.

The 17th paragraph of this section does not appear to identify armed security officers as part of the armed response team. Please clarify, by position title, the personnel assigned to response team duties consistent with section 18 of the PSP.

Please clarify the topic and intent of the 19th paragraph. This paragraph addresses the site response to an insider threat, but does so in a manner that could be applicable to all emergency condition scenarios. Clarify the function/role of the IMP within the physical protection program and the site-wide response to threats. Describe the security actions to be taken if a site-specific insider threat is identified.

In the 20th paragraph, please clarify the purpose/function of the VBS. Please describe whether the function of the VBS is to prevent access to the PA or to prevent the DBT vehicle bomb from gaining proximity to personnel, systems, and equipment needed to prevent significant core damage and spent fuel sabotage (i.e., the safe-standoff distance).

Regulatory Basis.

10 CFR Part 73, Appendix C, Section II, Paragraph B.3.c. Safeguards Systems.

The safeguards contingency plan must include a description of the physical security systems that support and influence how the licensee will respond to an event in accordance with the design basis threat described in § 73.1(a). The licensee's description shall begin with onsite physical protection measures implemented at the outermost facility perimeter, and must move inward through those measures implemented to protect target set equipment.

(i) Physical security systems and security systems hardware to be discussed include security systems and measures that provide defense in depth, such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

(ii) The specific structure of the security response organization to include the total number of armed responders and armed security officers documented in the approved security plans as a component of the protective strategy and a general description of response capabilities shall also be included in the safeguards contingency plan.

