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52-026

ND-09-1687

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4 Combined License Application
Response to Request for Additional Information Letter No. 041

Ladies and Gentlemen:

By letter dated March 28, 2008, Southern Nuclear Operating Company (SNC) submitted an application for combined licenses (COLs) for proposed Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to the U.S. Nuclear Regulatory Commission (NRC) for two Westinghouse AP1000 reactor plants, in accordance with 10 CFR Part 52. During the NRC's detailed review of this application, the NRC identified a need for additional information required to complete their review of the COL application's Final Safety Analysis Report (FSAR) Section 13.6, "Security," and the proposed Physical Security Plan (PSP) that was submitted to the NRC for review on April 1, 2009. By letter received September 17, 2009, the NRC provided SNC with Request for Additional Information (RAI) letter No. 041 concerning this information need. This RAI letter contains 20 RAI questions, numbered 13.06-1 through 13.06-20. The enclosures to this letter provide the SNC response to these questions.

Security-Related Information has been removed from the redacted version of the RAI responses in Enclosure 1, and accordingly Enclosure 1 may be released to the public. **The RAI responses provided in Enclosure 2 to this letter contain Security-Related Information, and accordingly this enclosure is requested to be withheld from public disclosure under 10 CFR 2.390 (d).** No text was redacted from the responses to RAI questions 13.06-1, 13.06-16, 13.06-17, and 13.06-19 provided in Enclosure 1; therefore, these responses are not included in Enclosure 2.

If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061.

DO92
NRC

Mr. J. A. (Buzz) Miller states he is an Executive Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Joseph A. (Buzz) Miller

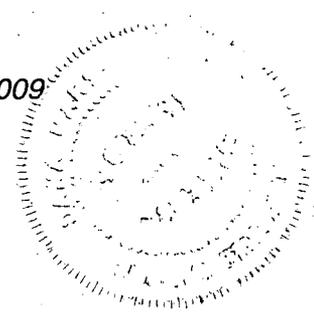
Sworn to and subscribed before me this 16th day of October, 2009

Notary Public: Dana M. Williams

My commission expires: 12/29/2010

JAM/WAS/dmw

- Enclosures:
1. Response to NRC RAI Letter No. 041 on the VEGP Units 3 & 4 COL Application Involving the Proposed Physical Security Plan
PUBLIC VERSION – REDACTED
 2. Response to NRC RAI Letter No. 041 on the VEGP Units 3 & 4 COL Application Involving the Proposed Physical Security Plan
NON-PUBLIC VERSION CONTAINS SECURITY-RELATED INFORMATION



cc: Southern Nuclear Operating Company

Mr. J. H. Miller, III, President and CEO (w/o enclosures)
Mr. J. T. Gasser, Executive Vice President, Nuclear Operations (w/o enclosures)
Mr. D. H. Jones, Site Vice President – Vogtle 3 and 4 (w/o enclosures)
Mr. T. E. Tynan, Vice President - Vogtle (w/o enclosures)
Mr. M. K. Smith, Technical Support Director
Mr. D. M. Lloyd, Vogtle 3 & 4 Project Support Director (w/o Enclosure 2)
Mr. C. R. Pierce, AP1000 Licensing Manager
Mr. M. J. Ajluni, Nuclear Licensing Manager
Mr. W. A. Sparkman, COL Project Engineer
Document Services RTYPE: AR01.1053
File AR.01.02.06

Nuclear Regulatory Commission

Mr. L. A. Reyes, Region II Administrator (w/o enclosures)
Mr. F.M. Akstulewicz, Deputy Director Div. of Safety Systems & Risk Assess. (w/o enclosures)
Ms. S. M. Coffin, AP1000 Manager of New Reactors (w/o enclosures)
Mr. R. G. Joshi, Lead Project Manager of New Reactors
Mr. B. Hughes, Project Manager of New Reactors
Ms. T. E. Simms, Project Manager of New Reactors
Mr. B. C. Anderson, Project Manager of New Reactors
Mr. M. M. Comar, Project Manager of New Reactors
Ms. S. Goetz, Project Manager of New Reactors
Mr. J. M. Sebrosky, Project Manager of New Reactors
Mr. D. C. Habib, Project Manager of New Reactors
Mr. C. P. Patel, Project Manager of New Reactors
Ms. M. A. Sutton, Environmental Project Manager
Mr. M. D. Notich, Environmental Project Manager
Mr. L. M. Cain, Senior Resident Inspector of VEGP

Georgia Power Company

Mr. O. C. Harper, IV, Vice President, Resource Planning and Nuclear Development (w/o Enclosure 2)

Oglethorpe Power Corporation

Mr. M. W. Price, Chief Operating Officer (w/o Enclosure 2)
Mr. K. T. Haynes, Director of Contracts and Regulatory Oversight (w/o Enclosure 2)

Municipal Electric Authority of Georgia

Mr. C. B. Manning, Jr., Senior Vice President, Participant and Corporate Affairs (w/o Enclosure 2)

Dalton Utilities

Mr. D. Cope, President and Chief Executive Officer (w/o Enclosure 2)

Bechtel Power Corporation

Mr. J. S. Prebula, Project Engineer (w/o enclosures)
Mr. R. W. Prunty, Licensing Engineer

Tetra Tech NUS, Inc.

Ms. K. K. Patterson, Project Manager (w/o Enclosure 2)

Shaw Stone & Webster, Inc.

Mr. K. B. Allison, Project Manager (w/o enclosures)

Mr. J. M. Oddo, Licensing Manager

Mr. D. C. Shutt, Licensing Engineer

Westinghouse Electric Company, LLC

Mr. W. E. Cummins, Vice President of Regulatory Affairs and Standardization (w/o enclosures)

Mr. N. C. Boyter, Consortium Project Director Vogtle Units 3 & 4 (w/o enclosures)

Mr. S. A. Bradley, Vogtle Project Licensing Manager

Mr. R. B. Sisk, Manager, AP1000 Licensing and Customer Interface

Mr. J. L. Whiteman, Principal Engineer, Licensing & Customer Interface

Mr. D. A. Lindgren, Principal Engineer AP1000 Licensing and Customer Interface

NuStart Energy

Mr. R. J. Grumbir

Mr. E. R. Grant

Mr. B. Hirmanpour

Mr. N. Haggerty

Ms. K. N. Slays

Other NuStart Energy Associates

Ms. M. C. Kray, NuStart

Mr. S. P. Frantz, Morgan Lewis

Mr. P. S. Hastings, NuStart & Duke Energy

Mr. J. A. Bailey, TVA

Ms. A. L. Sterdis, TVA

Mr. J. P. Berger, EDF

Mr. M. W. Gettler, FP&L

Mr. P. Hinnenkamp, Entergy

Mr. G. D. Miller, PG&N

Mr. M. C. Nolan, Duke Energy

Mr. N. T. Simms, Duke Energy

Mr. G. A. Zinke, NuStart & Entergy

Mr. R. H. Kitchen, PGN

Ms. A. M. Monroe, SCE&G

Mr. R. Reister, DOE/PM

Southern Nuclear Operating Company

ND-09-1687

Enclosure 1

Response to NRC RAI Letter No. 041

on the

VEGP Units 3 & 4 COL Application

Involving the

Proposed Physical Security Plan

PUBLIC VERSION - REDACTED

FSAR Section 13.6, Security

eRAI Tracking No. 3384

NRC RAI Number 13.06-1:

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.

SNC Response:

Information pertaining to the implementation of Operational Programs, such as the Security Program (including the Physical Security Program, Safeguards Contingency Program, and Training and Qualification Program) is provided in FSAR Table 13.4-201. As noted in Table 13.4-201, a license condition is proposed to schedule the activities necessary to support the planning and conduct of the NRC inspection(s) that will assess the readiness of the Security Program. As indicated in the introduction to proposed License Condition 6, the proposed process for planning and scheduling activities associated with operational program readiness inspections is in accordance with the NRC guidance provided in SECY-05-0197.

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3384

NRC RAI Number 13.06-2:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3384

NRC RAI Number 13.06-3:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

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Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3384

NRC RAI Number 13.06-4:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3384

NRC RAI Number 13.06-5:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3384

NRC RAI Number 13.06-06:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3388

NRC RAI Number 13.06-7:

Regarding Physical Security Plan, (revision 1) dated March 31, 2009 section 4.1, Page 5 & 6, paragraphs 5, 6 & 13, please clarify how the Nuclear Security Captain will fulfill the requirements of Armed Response Team Leader, Security Shift Supervisor and is also assigned as being the one member, onsite and available at all times, who has the authority to direct the activities of the security organization. Appendix A, page A-8, Security Supervision, Appendix B, 3.3. and Appendix C, Section 4.5. & 4.6 do not appear to contain the position of Captain. Please provide this information, or justify its omission.

SNC Response:

The position of Nuclear Security Captain (NSC) is specifically identified and the assigned functions and responsibilities are described in the following PSP sections:

- Section 4.1;
- Appendix A definition of *Security Supervision* (page A-8);
- Appendix B, Section 3.3 (page B-7), by reference to the Critical Task Matrix (Table 1);
- Appendix B, Table 1; and
- Appendix C, Sections 4.5 (page C-29) and 4.6 (page C-30).

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.
This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3388

NRC RAI Number 13.06-8:

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.

SNC Response:

[
This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3388

NRC RAI Number 13.06-9:

Regarding Physical Security Plan, (revision 1) dated March 31, 2009, Appendix C, Safeguards Contingency Plan, Section 4.1.1, Page C-26, and section 4.1.2, page C-28, the duty position Field Team Leader (FTL) does not appear to be described in the Physical Security Plan, section 4.1, Page 5 & 6. 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 Nuclear Security Captain. In addition, please clarify the apparent inconsistency of this position description with Appendix B, Section 3.3 and Table 1 - Critical Task Matrix.

SNC Response:

The black text in Section 4.1 of NEI 03-12 does not discuss the roles and responsibilities of the Response Team Leader (RTL). Black text is verbatim language from the NRC-endorsed NEI 03-12, Revision 6 template. Since the black text does not discuss this functional position and there is no bracketed text in this section to discuss the RTL functions, the PSP will not be changed in Section 4.1.

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

A future revision of the PSP will reflect the changes discussed in this response.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

1. COLA Part 8, PSP Section 4.1.1, Page C-26, will be revised from:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

To read:

[
This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

2. COLA Part 8, PSP Section 4.1.2, Page C-28, will be revised from:

[
This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

To read:

[
This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3391

NRC RAI Number 13.06-10:

Physical Security Plan 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.

SNC Response:

The Physical Performance Test and the Physical Fitness Test are the same test. The PSP will be revised to add a parenthetical statement after the Physical Performance Test title to indicate that it is also referred to as the Physical Fitness Test. This approach will alleviate the need to revise existing implementing procedures, which use the Physical Performance Test title. Also, the description will be amplified to address the three areas to be demonstrated.

The description of the Physical Performance Test in Section 2.4 of Appendix B will be revised as indicated in the Associated VEGP COL Application Revisions section of this response.

A future revision of the PSP will reflect the changes discussed in this response.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

COLA Part 8, PSP, Appendix B, Section 2.4, will be revised from:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

To read:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3391

NRC RAI Number 13.06-11:

Physical Security Plan, (revision 1) dated March 31, 2009, Appendix B Training and Qualification Plan, Page B14, Table 1, task 15 is identified as being performed by watch personnel. Please provide clarification that demonstrates a timely response and interdiction for this task by watch personnel.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3394

NRC RAI Number 13.06-12:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3394

NRC RAI Number 13.06-13:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 3395

NRC RAI Number 13.06-14:

Physical Security Plan, section 1.1 does not appear to describe or confirm that consideration was given to railroad/spur, airports, pipelines, hazardous material facilities and pertinent environmental features (e.g. flat or mountainous topography, wooded or grass land) that may have an effect upon coordination of response activities. Please describe how these features were considered. In addition, information related to the main and alternate entry routes for LLEA, the control point for marshalling and coordination response activities, and the "Red Zone Fence" does not appear to be described. Please provide this additional information, as appropriate, in Appendix A and/or figures 1, 2, and 3.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3395

NRC RAI Number 13.06-15:

Physical Security Plan Section 11.3, Page 12. 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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3396

NRC RAI Number 13.06-16:

Physical Security Plan, (revision 1) dated March 31, 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 omission.

SNC Response:

The Table of Contents will be revised to include Table 1 – Critical Task Matrix.
A future revision of the PSP will reflect the changes discussed in this response.
This response is PLANT-SPECIFIC.

Associated VEGP COL Application Revisions:

COLA Part 8, PSP Table of Contents, Page vii, will be revised to include the following entry below Section 5, Definitions, as follows:

5. DEFINITIONS.....	B-14
TABLE 1 - CRITICAL TASK MATRIX.....	B-15

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3396

NRC RAI Number 13.06-17:

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.

SNC Response:

The text in Section 14.1 that provides the commitment to adopt Regulatory Guide 5.66, Revision 1, is black text in the NEI 03-12 template. Black text is verbatim language from the NRC-endorsed NEI 03-12, Revision 6 template. The commitment to adopt Regulatory Guide 5.66, Revision 1, is understood to include the requirement that 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 response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3403

NRC RAI Number 13.06-18:

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.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3403

NRC RAI Number 13.06-19:

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.

SNC Response:

The vital areas for the AP1000 are defined in APP-GW-GLR-066, AP1000 Safeguards Assessment, which is referenced in Section 13.6 of the Design Control Document. The PSP reflects the same vital areas described in the AP1000 Safeguards Assessment. The defined vital areas include the minimum vital areas identified in §73.55(e)(9)(v). To provide a clear indication that each of the required minimum vital areas are protected, the vital area list in PSP Section 14.5 will be revised, as necessary, to clearly identify any regulatory minimum vital areas that are bounded by the larger vital areas included in the list. Regulatory minimum vital areas that are included within a bounding vital area will be identified by a parenthetical statement, such as "(includes the spent fuel pool)."

A future revision of the PSP will reflect the changes discussed in this response.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

The changes to COLA Part 8, PSP, Section 14.5, are described under the SNC Response above. Due to the sensitive nature of this material, the specific COL Applicant Revisions are not presented in this response. A future revision of the PSP will reflect the changes discussed above and will indicate the regulatory minimum vital areas.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

ND-09-1687
Enclosure 1
Response to RAI Letter No. 041

eRAI Tracking No. 3403

NRC RAI Number 13.06-20:

Physical Security Plan, (revision 1) dated March 31, 2009, Section 15.3, Page 28, 6th paragraph does not appear to include the secondary power supply systems location. Please describe the secondary power supply systems location, or justify its exclusion.

SNC Response:

[

This portion of the response contains security-related information (SRI) and has been redacted due to its sensitive nature.

]

The response to this question does not necessitate a change to the PSP.

This response is expected to be applicable to AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.