



Tennessee Valley Authority, 1101 Market Street, LP 5A, Chattanooga, Tennessee 37402-2801

October 20, 2009

10 CFR 52.79

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

In the Matter of)
Tennessee Valley Authority)

Docket No. 52-014 and 52-015

BELLEFONTE UNITS 3 AND 4, COMBINED LICENSE APPLICATION - RESPONSE TO
REQUEST FOR ADDITIONAL INFORMATION - SRP SECTION: 13.06 - PHYSICAL
SECURITY

- References: (1) Letter from Brian Anderson (NRC) to Andrea Sterdis (TVA), Request for Additional Information Letter No. 166 Related to SRP Section 13.06 for the Bellefonte Units 3 and 4 Combined License Application, dated September 17, 2009.
- (2) Letter from Joseph A. Miller (SNC) to NRC, ND-09-1687, Southern Nuclear Operating Company Vogtle Electric Generating Plant Units 3 and 4 Combined License Application Response to Request for Additional Information letter No. 041, dated October 16, 2009.

This letter provides the Tennessee Valley Authority's (TVA) response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) items included in Reference 1. Reference 2 is the R-COLA response to Physical Security RAIs and includes responses identified as Standard that are referenced in this response.

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).**

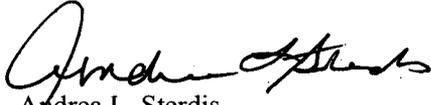
If you should have any questions, please contact Tom Spink at 1101 Market Street, LP5A, Chattanooga, Tennessee 37402-2801, by telephone at (423) 751-7062, or via email at tespink@tva.gov.

D085
NRO

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of Oct, 2009.



Andrea L. Sterdis
Manager, New Nuclear Licensing and Industry Affairs
Nuclear Generation Development & Construction

Enclosures:

- Enclosures:
1. Response to NRC RAI Letter No. 166 on the BLN Units 3 & 4 COL Application Involving the Proposed Physical Security Plan
PUBLIC VERSION – REDACTED
 2. Response to NRC RAI Letter No. 166 on the BLN Units 3 & 4 COL Application Involving the Proposed Physical Security Plan
NON-PUBLIC VERSION CONTAINS SECURITY-RELATED INFORMATION

cc: See Page 3

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cc: (w/ Enclosures)

J. P. Berger, EDF
J. M. Sebrosky, NRC/HQ
E. Cummins, Westinghouse
S. P. Frantz, Morgan Lewis
M. W. Gettler, FP&L
R. Grumbir, NuStart
P. S. Hastings, NuStart
P. Hinnenkamp, Entergy
M. C. Kray, NuStart
D. Lindgren, Westinghouse
G. D. Miller, PG&N
M. C. Nolan, Duke Energy
N. T. Simms, Duke Energy
K. N. Slays, NuStart
G. A. Zinke, NuStart

cc: (w/o Enclosure)

B. C. Anderson, NRC/HQ
M. M. Comar, NRC/HQ
B. Hughes/NRC/HQ
R. G. Joshi, NRC/HQ
R. H. Kitchen, PGN
M. C. Kray, NuStart
A. M. Monroe, SCE&G
C. R. Pierce, SNC
R. Reister, DOE/PM
L. Reyes, NRC/RII
T. Simms, NRC/HQ
L. Raghavan, NRC/HQ
T. Boyce, NRC/HQ

Enclosure
TVA letter dated October 20, 2009
RAI Response

Responses to NRC Request for Additional Information letter No. 166 dated September 17, 2009
(Enclosure 1: 18 pages, including this list; Enclosure 2: 18 pages including this list)

Subject: Request for Additional Information Letter No. 166 Related to SRP Section 13.06 for the
Bellefonte Units 3 and 4 Combined License Application

| <u>RAI Number</u> | <u>Date of TVA Response</u> |
|-------------------|-----------------------------------|
| 13.06-1 | This letter – see following pages |
| 13.06-2 | This letter – see following pages |
| 13.06-3 | This letter – see following pages |
| 13.06-4 | This letter – see following pages |
| 13.06-5 | This letter – see following pages |
| 13.06-6 | This letter – see following pages |
| 13.06-7 | This letter – see following pages |
| 13.06-8 | This letter – see following pages |
| 13.06-9 | This letter – see following pages |
| 13.06-10 | This letter – see following pages |
| 13.06-11 | This letter – see following pages |
| 13.06-12 | This letter – see following pages |
| 13.06-13 | This letter – see following pages |
| 13.06-14 | This letter – see following pages |
| 13.06-15 | This letter – see following pages |
| 13.06-16 | This letter – see following pages |

**BELLEFONTE NUCLEAR PLANT
UNITS 3 AND 4**

Enclosure 1

Response to NRC RAI Letter No. 166

Involving the

Proposed Physical Security Plan

PUBLIC VERSION - REDACTED

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
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 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).

BLN RAI ID: 3849
BLN RESPONSE:

The response to R-COLA RAI 13.06-1 (eRAI 3384) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard

ASSOCIATED BLN COL APPLICATION REVISIONS:
None

ASSOCIATED ATTACHMENTS/ENCLOSURES:
None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-2

Physical Security Plan, Section 11.2.1. Please provide some additional description of natural terrain features that make-up portions of the outer VBS and provide a 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.

BLN RAI ID: 3850
BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-3

Physical Security Plan, Section 11.3, Page 11. Please 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.

BLN RAI ID: 3851
BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-4

Regarding Physical Security Plan, section 4.1, Page 4, Last paragraph, please clarify whether the duties, responsibilities and training requirements for the position of Lieutenant include being the one member, onsite and available at all times, who has the authority to direct the activities of the security organization. In addition, please clarify whether the position of Lieutenant should be included in to Appendix A, page A-8, Security Supervision, Appendix B, 3.3. and Appendix C, Section 4.5 & 4.6.

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.

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.

BLN RAI ID: 3846

BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
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.

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.

BLN RAI ID: 3847
BLN RESPONSE:

The response to R-COLA RAI 13.06-5 (eRAI 3384) is also applicable to Bellefonte 3 & 4 and does not require additional review.

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

This response is Standard.

ASSOCIATED BLN COL APPLICATION REVISIONS:
None

ASSOCIATED ATTACHMENTS/ENCLOSURES:
None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-6

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).

BLN RAI ID: 3848
BLN RESPONSE:

The response to R-COLA RAI 13.06-19 (eRAI 3403) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard.

ASSOCIATED BLN COL APPLICATION REVISIONS:

The changes to COLA Part 8, PSP, Section 14.5, are described under the R-COLA Response referenced 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

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-7

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.

Regulatory Basis: Title 10 CFR 73.55(k)(8) Upon receipt of an alarm or other indication of a threat, the Licensee shall: (ii) Initiate response actions to interdict and neutralize the threat in accordance with the requirements of part 73, appendix C, section II, the safeguards contingency plan, and the licensee's response strategy. Appendix C to part 73 A (4) The responses should be timely, and include personnel who are trained and qualified to respond in accordance with a documented training and qualification program.

BLN RAI ID: 3845
BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-8

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.

Regulatory Basis: 10 CFR 73.55, Appendix C Section II, Paragraph B(3)(b). 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.

BLN RAI ID: 3842
BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:
None

ASSOCIATED ATTACHMENTS/ENCLOSURES:
None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-9

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).

BLN RAI ID: 3843
BLN RESPONSE:

The response to R-COLA RAI 13.06-13 (eRAI 3394) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-10

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.

BLN RAI ID: 3844

BLN RESPONSE:

The response to R-COLA RAI 13.06-18 (eRAI 3403) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-11

Physical Security Plan, Section 11.3, Page 11. 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/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.

BLN RAI ID: 3839

BLN RESPONSE:

The response to R-COLA RAI 13.06-15 (eRAI 3395) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-12

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.

BLN RAI ID: 3840
BLN RESPONSE:

The response to R-COLA RAI 13.06-8 (eRAI 3388) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard

ASSOCIATED BLN COL APPLICATION REVISIONS:
None

ASSOCIATED ATTACHMENTS/ENCLOSURES:
None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-13

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.

BLN RAI ID: 3841
BLN RESPONSE:

[
This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-14

Physical Security Plan, Section 15.3, Page 23, 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.

BLN RAI ID: 3852
BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

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

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-15

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.

BLN RAI ID: 3853
BLN RESPONSE:

[

This portion of the response contains security-related information (SRI) and has been redacted Under 10 CFR 2.390(d) due to its sensitive nature.

]

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:
None

ASSOCIATED ATTACHMENTS/ENCLOSURES:
None

NRC Letter Dated: September 17, 2009
NRC Review of Final Safety Analysis Report Section 13.6
NRC RAI NUMBER: 13.06-16

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.

BLN RAI ID: 3854

BLN RESPONSE:

The response to R-COLA RAI 13.06-17 (eRAI 3396) is also applicable to BLN 3 & 4 and does not require additional review.

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

This response is Standard.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None