



Serial: NPD-NRC-2009-220  
October 22, 2009

10CFR52.79

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

**LEVY NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 52-029 AND 52-030  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 066 RELATED TO  
PHYSICAL SECURITY**

Reference: Letter from Brian C. Anderson (NRC) to Garry Miller (PEF), dated September 17, 2009, "Request for Additional Information Letter No. 066 Related to SRP Section 13.6 for the Levy County Nuclear Plant, Units 1 and 2 Combined License Application"

Ladies and Gentlemen:

Progress Energy Florida, Inc. (PEF) hereby submits our response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) provided in the referenced letter.

A response to the NRC request is addressed in the enclosures. The enclosures also identify changes that will be made in a future revision of the Levy Nuclear Plant Units 1 and 2 application. 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 10CFR2.390(d).

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (727) 820-4481.

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

Executed on October 22, 2009.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Elnitsky'.

John Elnitsky  
Vice President  
Nuclear Plant Development

Enclosures

cc : U.S. NRC Region II, Regional Administrator (without Enclosure 2)  
Mr. Brian C. Anderson, U.S. NRC Project Manager

Progress Energy Florida, Inc.  
P.O. Box 14042  
St. Petersburg, FL 33733

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NRO

Enclosure 1

Response to LNP-RAI-LTR-066

**PUBLIC VERSION - REDACTED**

**Levy Nuclear Plant Units 1 and 2**  
**Response to NRC Request for Additional Information Letter No. 066 Related to**  
**SRP Section 13.6 for the Combined License Application, dated September 17, 2009**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
13.06-1	L-0539	Response enclosed – see following pages
13.06-2	L-0540	Response enclosed – see following pages
13.06-3	L-0541	Response enclosed – see following pages
13.06-4	L-0542	Response enclosed – see following pages
13.06-5	L-0543	Response enclosed – see following pages
13.06-6	L-0544	Response enclosed – see following pages
13.06-7	L-0545	Response enclosed – see following pages
13.06-8	L-0546	Response enclosed – see following pages
13.06-9	L-0547	Response enclosed – see following pages
13.06-10	L-0548	Response enclosed – see following pages
13.06-11	L-0549	Response enclosed – see following pages
13.06-12	L-0550	Response enclosed – see following pages
13.06-13	L-0551	Response enclosed – see following pages
13.06-14	L-0552	Response enclosed – see following pages
13.06-15	L-0553	Response enclosed – see following pages
13.06-16	L-0554	Response enclosed – see following pages
13.06-17	L-0555	Response enclosed – see following pages
13.06-18	L-0556	Response enclosed – see following pages

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-1

**Text of NRC RAI:**

The Physical Security Plan (Revision 01, Dated, April 1 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.

**PGN RAI ID #:** L-0539

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06 -1(VEGP eRAI 3384) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-2

**Text of NRC RAI:**

Physical Security Plan, (Revision 01, Dated, April 1 2009), section 8, Page 5. As described in NEI 03-12, rev #6, please provide additional information on response protocols for other response organizations and documentation for current agreements with Law enforcement agencies.

**PGN RAI ID #:** L-0540

**PGN Response to NRC RAI:**

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

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-3

**Text of NRC RAI:**

Physical Security Plan, Section 11.2.1. 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. If applicable, this additional information should be incorporated in the Facility Physical Layout Drawing.

**PGN RAI ID #:** L-0541

**PGN Response to NRC RAI:**

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

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**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-4

**Text of NRC RAI:**

Physical Security Plan, (Revision 01, Dated, April 1 2009), section 4.1, Page 4, paragraphs 9. Please provide clarification on the duties, responsibilities and training requirements for Supervisor-Security Shift and qualified Sergeant. Describe what duty position the Sergeant fulfills as listed in Appendix B Training and Qualification Plan, Table 1, and Appendix C section 4.1.2.

**PGN RAI ID #:** L-0542

**PGN Response to NRC RAI:**

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

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**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-5

**Text of NRC RAI:**

Regarding Physical Security Plan, (Revision 01, Dated, April 1 2009), Appendix C, Safeguards Contingency Plan, Section 4.1.1, Page C-17, and section 4.1.2, page C-18, the Duty position Security Force Supervisor (RTL) does not appear to be described in the Physical Security Plan, section 4.1, Page 4. 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 Armed Response Team Leader (RTL) and the Security Shift Supervisor (SSS). In addition, please clarify the apparent inconsistency of this position description with Appendix B, Section 3.3 and Table 1- Critical Task Matrix.

**PGN RAI ID #:** L-0543

**PGN Response to NRC RAI:**

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

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.



**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-6

**Text of NRC RAI:**

Physical Security Plan, (Revision 01, Dated, April 1 2009), section 15.4, Page 21. Please provide clarification on the duties, responsibilities and training requirements for Nuclear Shift Manager. This position does not appear to be listed in Section 4.1, Appendix B Training and Qualification Plan, Table 1, Appendix C, Safeguards Contingency Plan, Section 4.1.1, Page C-17, and section 4.1.2, page C-18.

**PGN RAI ID #:** L-0544

**PGN Response to NRC RAI:**

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

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-7

**Text of NRC RAI:**

Physical Security Plan, (Revision 01, Dated, April 1 2009), Section 14.2.1, Page 14, 2<sup>nd</sup> paragraph. The term inspection is inconsistent with Appendix B Training and Qualification Plan, Page B16, Table 15, Task 6. In addition, the items listed as being searched for is inconsistent with Appendix A, Terms and Acronyms definition for contraband. Please explain these inconsistencies.

**PGN RAI ID #:** L-0545

**PGN Response to NRC RAI:**

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

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**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-8

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0546

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-17 (VEGP eRAI 3396) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-9

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0547

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-19 (VEGP eRAI 3403) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-10

**Text of NRC RAI:**

Physical Security Plan Section 11.3. 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.

**PGN RAI ID #:** L-0548

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-15 (VEGP eRAI 3395) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

].

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-11

**Text of NRC RAI:**

Physical Security Plan, (Revision 01, Dated, April 1 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 exclusion.

**PGN RAI ID #:** L-0549

**PGN Response to NRC RAI:**

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

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-12

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0550

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-18 (VEGP eRAI 3403) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

].

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-13

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0551

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-5 (VEGP eRAI 3384) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.



**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-14

**Text of NRC RAI:**

Physical Security Plan, (Revision 01, Dated, April 1 2009), Section 15.3, Page 20. 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.

**PGN RAI ID #:** L-0552

**PGN Response to NRC RAI:**

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

].

**Associated LNP COL Application Revisions:**

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

].

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-15

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0553

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-8 (VEGP eRAI 3388) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-16

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0554

**PGN Response to NRC RAI:**

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

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-17

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0555

**PGN Response to NRC RAI:**

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

].

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-066

**NRC Letter Date:** September 17, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 13.06-18

**Text of NRC RAI:**

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.

**PGN RAI ID #:** L-0556

**PGN Response to NRC RAI:**

The response to R-COLA RAI 13.06-13 (VEGP eRAI 3394) is also applicable to Levy Nuclear Plant and does not require additional review.

**Associated LNP COL Application Revisions:**

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

**Attachments/Enclosures:**

None.