

PMSTPCOL PEmails

From: Anand, Raj
Sent: Thursday, November 05, 2009 10:42 AM
To: gaskeel@stpegs.com
Cc: Mookhoek, William; Puleo, Frederick; Tonacci, Mark; Wunder, George; STPCOL; Williams, Vince; Prescott, Peter
Subject: Draft Physical Security Audit Plan
Attachments: South Texas Audit Plan (Nov 17).doc

Hi Gary,

Enclosed is the Physical Security Audit Plan for your review and information. We plan to have a Entrance meeting on November 17 at 8.30 am and Exit meeting on November 18 at 4.30 pm. We also like to walk down the proposed units 3 and 4 site right after the entrance meeting on 11/17.

If you have any questions or concerns, and/or need any additional information, please contact me.

Thanks,

Raj

Raj Anand

Raj Anand

Project Manager

Division of New Reactor Licensing

Office of New Reactors

The Nuclear Regulatory Commission

E-mail: Raj.Anand@nrc.gov

Hearing Identifier: SouthTexas34Public_EX
Email Number: 1828

Mail Envelope Properties (B46615B367D1144982B324704E3BCEED1A5B237150)

Subject: Draft Physical Security Audit Plan
Sent Date: 11/5/2009 10:42:04 AM
Received Date: 11/5/2009 10:42:06 AM
From: Anand, Raj

Created By: Raj.Anand@nrc.gov

Recipients:

"Mookhoek, William" <wemookhoek@STPEGS.COM>
Tracking Status: None
"Puleo, Frederick" <fjpuleo@STPEGS.COM>
Tracking Status: None
"Tonacci, Mark" <Mark.Tonacci@nrc.gov>
Tracking Status: None
"Wunder, George" <George.Wunder@nrc.gov>
Tracking Status: None
"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
"Williams, Vince" <Vince.Williams@nrc.gov>
Tracking Status: None
"Prescott, Peter" <Peter.Prescott@nrc.gov>
Tracking Status: None
"gaskeel@stpegs.com" <gaskeel@stpegs.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	615	11/5/2009 10:42:06 AM
South Texas Audit Plan (Nov 17).doc		103930

Options

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

PHYSICAL SECURITY AUDIT PLAN

November 17-18, 2009

South Texas Combined License Application
Units 3 & 4

Docket No. 52-012 and 52-013

TAC No.: RA 2335

Location: South Texas Project
Bay City, Texas

Purpose:

The purpose of the audit is to conduct a review of the information and documentation that was used as a technical basis to address the combined license action item 13.6.3.3-3. This action item provides an evaluation of the interdiction capability of the security response force for the protection of the proposed South Texas Project Units 3 and 4.

Regulatory Audit Bases:

The audit is required to examine and evaluate the technical information used by the applicant South Texas to address the use of security personnel in the protection of the proposed site in the interdiction evaluation document that was docketed. The audit will assist NRC staff in the preparation and issuance of RAIs and the closure of action item 13.6.3.3-3 for the licensing review of the South Texas Units 3 & 4 COLA, section 13.6, physical security.

10 CFR 73.2 defines vital equipment. 10 CFR 73.55(e)(9)(i) requires that all vital equipment be located within a protected area so that access to vital equipment requires passage through at least two physical barriers.

10 CFR 73.55(b)(4) requires a licensee to analyze and identify site-specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of 10 CFR 73.55 and account for these conditions in the design of the physical protection program.

Part 73, appendix C, Section II.B.3.c (v), requires licensees to develop, implement, and maintain a written protective strategy to be documented in procedures that describes in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan.

10 CFR 73.55(c)1(i) describes how a licensee will implement requirements of 10 CFR 73.55 through the establishment and maintenance of a security organization, the use of security equipment and technology, the training and qualification of security personnel, the

DRAFT

implementation of predetermined response plans and strategies, and the protection of digital computer and communication systems and networks.

Regulatory Audit Scope:

The audit scope will include the review of supporting documentation that establishes the technical basis for meeting performance objectives and specific requirements of 10 CFR 73 relative to the closure of South Texas combined license action item 13.6.3.3-3.

- NRC staff request a protective strategy presentation by the South Texas Project Units 3 and 4 combined license applicant that provides an overview of how the requirements of Part 73, appendix C, Section II, B.3.c.(v) was addressed in the applicant's closure of COL action item 13.6.3.3-3. This presentation should include a set of tabletop exercises (4) to present a representative sample of the scenarios that the applicant used to validate the conclusions of the COL action item 13.6.3.3-3 documentation.
- The audit will also review supporting information that was used by the applicant to develop and identify target sets to include the site-specific analyses and methodologies used to determine and group target set equipment or elements. The applicant should have all references used to develop target sets available for the audit team. The applicant should have a Probability Risk Assessment (PRA) engineer, an operations representative, and security representative available for the two day site audit.
- The audit team will also review the supporting information that was used by the applicant to address Safety/Security interface for the conclusions captured in the evaluation report.
- NRC staff will discuss and possibly review the changes for the Interdiction Capability Evaluation that will be provided to the NRC to reflect the changes from one protected area to two protected areas for the South Texas site.
- NRC staff request to review a draft copy of the South Texas units 3 & 4 security plan that will reflect the revisions for one protected area to two and the associated impacts relative to this change. The NRC staff will also discuss security plan revisions associated with changes to the protective strategy.

Information and Other Material Necessary for the Regulatory Audit:

- NRC staff requests a site walkdown of the proposed new reactor location to include certain critical areas of the existing owner controlled area. South Texas Project staff should have area maps available for this site walkdown.
- The following information should be made available for the review of vital areas:
 - 1) Vital equipment list with site specific differences included
 - 2) The references used to develop the vital equipment list
 - 3) Safety-related equipment list
 - 4) Internal events PRA success criteria
 - 5) Flooding and fire PRAs
 - 5) Site procedure for the development of target sets

DRAFT

Audit Team:

- Raj Anand, NRC, Office of New Reactors, Division of New Reactor Licensing, Project Manager
- Pete Prescott ,NRC, Nuclear Security Incident and Response (NSIR) Division of Security Policy, Team Leader
- Vince Williams, NRC, NSIR Physical Security Technical Reviewer for South Texas units 3 & 4 COLA, NSIR Division of Security Operations staff
- Bruce Mrowca, NRC Contractor, supporting technical reviewer of South Texas units 3 & 4 COLA

Applicant Contact:

- William Mookhoek, STP Licensing Supervisor
- Gary Skeel, STP Staff
- Fred Puleo, STP Staff

Background:

Ongoing NRC staff review of the applicant's information on the docket has identified information that was not provided to the staff in the submission of security information to support the South Texas unit 3 & 4 COLA review. NRC staff is interested in the applicant's information that formulated the conclusions that were found in the evaluation of the interdiction capability of the security response force. The NRC staff will provide RAIs for any additional information identified during the audit as necessary for the review of the application.

Logistics:

The audit will be conducted at the location identified above. The audit is scheduled to begin on November 17, 2009, and end on November 18, 2009. Each day during the audit, the team plans to work 8:00am to 5:00pm. Participating individuals will meet at the audit location.

Special Requests:

All NRC staff and contractors supporting the audit are cleared for access to safeguards information and have the need to know the information provided during the audit. Appropriate handling and protection of Safeguards Information (SGI) shall be acknowledged and observed throughout the audit.

Deliverables:

An audit report will be generated after completion of the audit. The audit outcome will be used to identify information not currently addressed on the docket and for the submittal of additional information for making security findings and regulatory decisions.

DRAFT

Reference:

1. South Texas Units 3 & 4 combined license application Section 13.6.3.3-3 .

Docket No. 52-012 and 52-013