

## LevyCountyRAIsPEm Resource

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**From:** McGovern, Denise  
**Sent:** Monday, March 08, 2010 3:53 PM  
**To:** LevyCountyRAIsPEm Resource  
**Subject:** REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 084 RELATED TO SRP SECTION 13.6 FOR THE LEVY COUNTY NUCLEAR PLANT, UNITS 1 AND 2 COMBINED LICENSE APPLICATION  
**Attachments:** RAI-LTR-084.doc  
**Importance:** High

*Denise L. McGovern*

Project Manager  
Office of New Reactors  
U.S. Nuclear Regulatory Commission  
301.415.0681

**Hearing Identifier:** Levy\_County\_COL\_eRAIs  
**Email Number:** 84

**Mail Envelope Properties** (A41C2340DAB39B44AD0B9623285CB333088ED71E05)

**Subject:** REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 084 RELATED TO SRP SECTION 13.6 FOR THE LEVY COUNTY NUCLEAR PLANT, UNITS 1 AND 2 COMBINED LICENSE APPLICATION

**Sent Date:** 3/8/2010 3:52:59 PM

**Received Date:** 3/8/2010 3:53:01 PM

**From:** McGovern, Denise

**Created By:** Denise.McGovern@nrc.gov

**Recipients:**

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

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MESSAGE	118	3/8/2010 3:53:01 PM
RAI-LTR-084.doc	84474	

**Options**

**Priority:** High

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

March 8, 2010

Mr. Garry Miller  
General Manager, Nuclear Plant Development  
Progress Energy Florida, Inc.  
PO Box 1551  
411 Fayetteville Street Mall  
Raleigh, NC 27602

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 084 RELATED TO  
SRP SECTION 13.6 FOR THE LEVY COUNTY NUCLEAR PLANT, UNITS 1  
AND 2 COMBINED LICENSE APPLICATION

Dear Mr. Miller:

By letter dated July 28, 2008, as supplemented by a letter dated September 12, 2008, Progress Energy Florida, Inc. submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced 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.

If you have any questions or comments concerning this matter, you may contact me at 301-415-0681 or you may contact Brian Anderson, the lead project manager for the Levy County, Units 1 and 2, at 301-415-9967.

Sincerely,

**/RA/**

Denise L. McGovern, Project Manager  
AP1000 Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-029  
52-030

eRAI Tracking No. 4210  
4211

Enclosure:  
Request for Additional Information

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-0681 or you may contact Brian Anderson, the lead project manager for the Levy County, Units 1 and 2, at 301-415-9967.

Sincerely,

**/RA/**

Denise L. McGovern, Project Manager  
AP1000 Projects Branch 1  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-029  
52-030

eRAI Tracking No. 4210  
4211

Enclosure:  
Request for Additional Information

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NRO-002

OFFICE	DSP/RSRLB	NWE1/PM	NWE1/L-PM
NAME	DHuyck*	DMcGovern*	BAnderson*
DATE	02/3/10	02/19/10	03/04/10

\*Approval captured electronically in the electronic RAI system.

**OFFICIAL RECORD COPY**

**Request for Additional Information**  
**Levy County, Units 1 and 2**  
**Progress Energy Florida, Inc.**  
**Docket No. 52-029 and 52-030**  
**SRP Section: 13.06 - Physical Security**  
**Application Section: Physical Security Plan**

**QUESTIONS for Reactor Security Rulemaking and Licensing Branch (NSIR/DSP/RSRLB)**

13.06-19

Physical Security Plan, (revision 2) dated September 3, 2009, Enclosure 2 (Erratum: Variances to Generic Guidance Provided by March 18, 2009 version of NEI 03-12, Rev. 6) letter addresses nine (9) changes five (5) of which were not addressed. Provide clarification on the status of these changes since they were not address in Physical Security Plan, (revision 2).

Page 2, Item # 1, Table of Content Page vi, Figures information is addressed as being relocated to Appendix E. This change is not reflected in the TOC, Physical Security Plan, (revision 2).

Page 2, items # 2, this editorial change was not addressed.

Page 2, item # 5 & 6, App. B, Subsection 3.6.4 and 3.6.4.1, deleted this information from the security plan section 9, page 7. These changes are not reflected in section 9, page 7, Physical Security Plan, (revision 2).

Page 3, item # 8, App. C, Subsection 5.4, deleted this information from the security plan section 5.4, page C-21. This change is not reflected in the security plan section 5.4, page C-21.

**Regulatory Basis:** 10 CFR 73.55(a)(2) The security plans must identify, describe, and account for site-specific conditions that affect the license's capability to satisfy the requirements of this section.

13.06-20

Physical Security Plan, (revision 2) dated September 3, 2009, 2009, Section 1.1Page 2, 3rd paragraph refers to a "Red Zone" delay barrier and Appendix C,, Safeguards Contingency Plan, section 8, page C-28 refers to delay barriers. Confirm that this is the same delay barrier for Units 1 and 2 and that it incorporates the requirements describe in the AP 1000 COL Standard Technical Report APP-GW-GLR-66, Rev 2.

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

13.06-21

Physical Security Plan, (revision 2) dated September 3, 2009, TOC page viii, (Item 5.9), Section 21, page 32, (first sentence), Appendix C, Section 5.9, page C-22, and Appendix D, refers to Independent Spent Fuel Storage Installation requirements. Clarify your intentions for use of the Independent Spent Fuel Storage Installation and add to Physical Security Plan, Section 1.1.

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

13.06-22

Physical Security Plan, (revision 2) dated September 3, 2009, 2009, Section 14.5. Page 20, Clarification of your intent with the text in parentheses at the bottom of the page ("For additional guidance...")

**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.

13.06-23

Physical Security Plan, (revision 2) dated September 3, 2009, 2009, Section 15.3. Page 22, Revise your design intent for the Intrusion Detection Equipment description to ensure you address the 10 CFR 73.55(e)(7)(i) and SRP 14.3.12, Physical Security Hardware-ITAAC, Number 4a.

**Regulatory Basis:** 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: (A) Designed and of sufficient size to permit observation and assessment of activities on either side of the protected area barrier; (B) Monitored with intrusion detection equipment designed to satisfy the requirements of § 73.55(i) and be capable of detecting both attempted and actual penetration of the protected area perimeter barrier before completed penetration of the protected area perimeter barrier;

13.06-24

Physical Security Plan, (revision 2) dated September 3, 2009, Appendix C, Safeguards Contingency Plan, Section 8, page C-28, 4<sup>th</sup> paragraph, make a reference to additional security measures to be used for VA doors. Clarify your intentions on how additional security measures will be incorporated into the VA doors outlined in AP 1000 COL Standard Technical Report APP-GW-GLR-66, Rev. 2, attachment 2, table 1.

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

13.06-25

Physical Security Plan, (revision 2) dated September 3, 2009, Appendix C, Safeguards Contingency Plan, section 7, page C-24, 1<sup>st</sup> paragraph. Describe the methodology used by Levy Units 1 and 2 in the development of target sets. Describe the types of information gathered/used (i.e., design certification document, PRA process, flood/fire analysis, etc.) and the areas of expertise that were available through the personnel assigned to the stated "expert panel." In addition, please describe the criteria used to identify and group target sets.

**Regulatory Basis:** 10 CFR 73.55 (F)(1) The licensee shall document and maintain the process used to develop and identify target sets, to include the site-specific analyses and methodologies used to determine and group the target set equipment or elements.

13.06-26

Physical Security Plan, (revision 2) dated September 3, 2009, Appendix C, Safeguards Contingency Plan, section 8, page C-26 to C-29, Confirm that the protective strategy description properly describes the Westinghouse protective strategy design features that are relied upon to effectively implement the protective strategy? (AP 1000 COL Standard Technical Report APP-GW-GLR-66, Rev 2)

Examples: BRE locations, Responder locations and the Delay fence locations

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

14.03.12-1

Levy Units 1 & 2, S-COL application revision 1, Part 10, Proposed License Conditions (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), addresses the Westinghouse Design Control Document (DCD), Tier 1, Table 2.6.9-1, revision 17, as providing specifies design commitments and ITAAC for the physical security system to be used as Levy's alternative method to the SRP 14.3.12, Physical Security Hardware-ITAAC. The Westinghouse DCD is being revised to address the new Part 73.55 rule requirements. Review and confirm each ITAAC listed below to verify that it properly reflects the applicant's intentions as an alternative to the SRP based on the most current revision of the DCD. Verify and provide the status of any COL action items assigned. What action will the Licensee take to revise ITAAC to reflect the final DCD?

The below ITAAC reference numbers from DCD, Tier 1 Table 2.6.9-1, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML ML092600348)

DCD Table 2.6.9-1 # 1	SRP Appendix "A" #6
DCD Table 2.6.9-1 # 2	SRP Appendix "A" #2b
DCD Table 2.6.9-1 # 3	SRP Appendix "A" #12
DCD Table 2.6.9-1 # 4	SRP Appendix "A" #10
DCD Table 2.6.9-1 # 5	SRP Appendix "A" #11a
DCD Table 2.6.9-1 # 6	SRP Appendix "A" #7
DCD Table 2.6.9-1 # 7a	SRP Appendix "A" #1a
DCD Table 2.6.9-1 # 7b	SRP Appendix "A" #1b
DCD Table 2.6.9-1 # 8	SRP Appendix "A" #5
DCD Table 2.6.9-1 # 9	SRP Appendix "A" #15
DCD Table 2.6.9-1 # 10	SRP Appendix "A" #4a
DCD Table 2.6.9-1 # 11	SRP Appendix "A" #9
DCD Table 2.6.9-1 # 12	SRP Appendix "A" #8 a & b
DCD Table 2.6.9-1 # 13	SRP Appendix "A" #16 a & b
DCD Table 2.6.9-1 # 14	SRP Appendix "A" #3 a & b
DCD Table 2.6.9-1 # 15	SRP Appendix "A" #13 a
DCD Table 2.6.9-1 # 16	SRP Appendix "A" #14



**Regulatory Basis:** 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

14.03.12-2

Levy 1 & 2, S-COL application revision 1, Part 10, Proposed License Conditions (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), Table 2.6.9-2 provides specifies the design commitments and ITAAC for the physical security system that are outside of the scope of the Westinghouse AP1000 DCD Tier 1 are to be used as your alternative method to the SRP Physical Security-ITAAC. Review and confirm each ITAAC listed below to verify that it properly reflects the applicant's intentions as an alternative to the SRP based on the most current revision of the S-COL application revision 1, Part 10 Table 2.6.9-2. What action will the Licensee take to revise ITAAC to reflect the final S-COL application, Part 10 Table 2.6.9-2?

The below ITAAC reference numbers from Part 10, Table 2.6.9-2, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) 14.3.12 Appendix "A" for clarification. (ADAMS Accession Number: ML ML092600348)

Part 10, Table 2.6.9-2 # 1	SRP Appendix "A" # 6 (Last Access Control)
Part 10, Table 2.6.9-2 # 2	SRP Appendix "A" #2a
Part 10, Table 2.6.9-2 # 3	SRP Appendix "A" #3a
Part 10, Table 2.6.9-2 # 3	SRP Appendix "A" #3c
Part 10, Table 2.6.9-2 # 4	SRP Appendix "A" #4a
Part 10, Table 2.6.9-2 # 5	SRP Appendix "A" #8a
Part 10, Table 2.6.9-2 # 5	SRP Appendix "A" #8b
Part 10, Table 2.6.9-2 # 6	SRP Appendix "A" #9

**Regulatory Basis:** 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.

14.03.12-3

Levy units 1 & 2, S-COL application revision 1, Part 10, Proposed License Conditions (including ITAAC), Table 2.6.9-2 or the and Westinghouse Design Control Document (DCD), Tier 1 revision 17, Table 2.6.9-1, does not address several of the new Part 73.55 rule requirements. Explain how Levy 1 & 2, will address these ITAAC areas. The below listed Physical Security ITAAC reference numbers are from the NUREG-800 Standard Review Plan (SRP) 14.3.12 appendix "A" for clarification (ADAMS Accession Number: ML ML092600348)

SRP Appendix "A" #2b  
SRP Appendix "A" #2c

SRP Appendix "A" #3b

**Regulatory Basis:** 10CFR 52.47(b)(1) The application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations.