

**Southern Nuclear
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MAR 05 2010

Docket Nos.: 52-025
52-026

ND-10-0457

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. 047
Physical Security Plan

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 (ADAMS ML090970164). By letter received February 4, 2010, the NRC provided SNC with Request for Additional Information (RAI) Letter No. 047 concerning this information need. That RAI letter contains nine RAI questions, numbered 13.06-27 through 13.06-32 and 14.03.12-1 through 14.03.12-3. The enclosures to this letter provide the SNC response to RAI questions 13.06-27 through 13.06-32, which involve the PSP. The SNC response to RAI questions 14.03.12-1 through 14.03.12-3, which involve physical security inspections, tests, analyses, and acceptance criteria (PS-ITAAC) and are identified by eRAI No. 4141 in RAI Letter No. 047, is provided in SNC submittal letter ND-10-0469.

This letter identifies changes that will be made to a future revision of the VEGP Units 3 and 4 COL Application to address NRC requirements in 10 CFR Part 73.

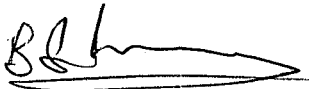
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NRD

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

Mr. B. L. (Pete) Ivey states he is a 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



Brian L. (Pete) Ivey

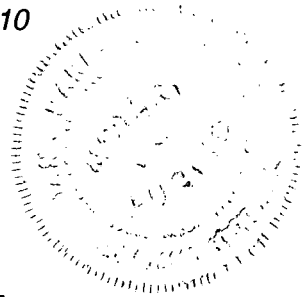
Sworn to and subscribed before me this 5th day of March, 2010

Notary Public: Dana M. Williams

My commission expires: 12/29/2010

BLI/BJS/dmw

Enclosure: Response to NRC RAI Letter No. 047 on the VEGP Units 3 & 4 COL Application Involving the Proposed Physical Security Plan



cc: Southern Nuclear Operating Company

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Mr. J. T. Gasser, Executive Vice President, Nuclear Operations (w/o enclosure)
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Mr. M. K. Smith, Technical Support Director (w/o enclosure)
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Document Services RTYPE: AR01.1053
File AR.01.02.06

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Southern Nuclear Operating Company

ND-10-0457

Enclosure

Response to NRC RAI Letter No. 047

on the

VEGP Units 3 & 4 COL Application

Involving the

Proposed Physical Security Plan

NOTE: The enclosed document is seven (7) pages in length.

FSAR Section 13.6, Security

eRAI Tracking No. 4140

NRC RAI Number 13.06-27

The current Vogtle operating Physical Security Plan (Rev 8) section 9.6 page 30 dated October 1, 2009, makes reference to the PESB Diesel and Associated Secondary Power Supply Equipment Rooms. The COLA Physical Security Plan (revision 1), dated March 31, 2009, section 14.5, page 25, does not address these areas. Clarify the status of these areas and their relation to the current operating reactors and why they are no longer required.

SNC Response:

The areas noted in this RAI are listed in the Physical Security Plan (PSP), Rev. 8, dated October 1, 2009, because they currently house security-related equipment utilized in support of Vogtle Electric Generating Plant (VEGP) Units 1 and 2. Upon integration of VEGP Units 3 and 4 into a common four-unit Protected Area (PA), the security-related equipment presently housed in the PESB Diesel and Associated Secondary Power Supply Equipment Rooms will be relocated to other areas within the common PA that are listed in Section 14 of the VEGP Units 3 and 4 COL Application PSP. Therefore, these areas are not listed in Section 14 of the VEGP Units 3 and 4 COL Application PSP, because they will no longer be utilized to house security equipment in support of VEGP.

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

This response is PLANT-SPECIFIC for VEGP.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 4140

NRC RAI Number 13.06-28:

Physical Security Plan (revision 1), dated March 31, 2009, Appendix C, Safeguards Contingency Plan, Section 4.2. Page C-28. The level of detail identified in this section is inconsistent with the referenced section 1.1, and figures 6, 7, 8, & 9. NRC staff requests the plan and maps be updated to reflect the necessary information.

SNC Response:

The required regulatory basis information will be incorporated into Section 1.1 of the PSP as indicated below. The Safeguards Contingency Plan will not be changed, because it references PSP Section 1.1. PSP Figure 6 will be revised to reflect any additional information that should be identified on this figure.

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

This response is PLANT-SPECIFIC for VEGP.

Associated VEGP COL Application Revisions:

1. COL Application Part 8, PSP Section 1.1, Page 2, will be revised from:

VEGP is located in Burke County, Georgia on the southwest side of the Savannah River approximately 23 river miles upstream from the intersection of the Savannah River and U.S. Highway 301. VEGP is directly across the Savannah River from the Department of Energy Savannah River Site in Barnwell County, South Carolina. VEGP is located near the city of Waynesboro, Georgia and is approximately 35 miles from Augusta, Georgia. Normal access to VEGP is accomplished through a spur road off Georgia Highway 56. The closest incorporated township in Georgia is Waynesboro, Georgia. Figure 6 reflects the relationship of VEGP and the roadways to the facility.

To read:

VEGP is located in Burke County, Georgia on the southwest side of the Savannah River approximately 30 river miles upstream from the intersection of the Savannah River and U.S. Highway 301. VEGP is directly across the Savannah River from the Department of Energy Savannah River Site (SRS) in Barnwell County, South Carolina. The largest municipality located near VEGP is Augusta, Georgia (approximately 26 miles from the VEGP site). Normal access to VEGP is accomplished through a spur road off Georgia Highway 56. The closest incorporated township is Waynesboro, Georgia (approximately 14 miles from the VEGP site). The closest active railway in Georgia is operated by Norfolk Southern and runs essentially parallel to GA State Highway 56 (approximately 12 miles from the VEGP site). A spur from this railway allows rail traffic to be diverted directly to the VEGP site. In addition, CSX operates an active railway in South Carolina that services the SRS (approximately 4.5 miles from the VEGP site). The closest waterway is the Savannah River which flows by the plant and carries light waterborne traffic. The nearest airport to VEGP is the Burke County Airport, which is located south of Waynesboro (approximately 16 miles from the VEGP site). The nearest commercial airport is the Augusta Regional Airport (AUG), which is located near Augusta (approximately 17 miles from the VEGP site). There are no pipelines or hazardous material facilities near the plant that would have an effect on coordination of response

activities. Figure 6 reflects the relationship of the roadways, railways, waterways, and nearest airports to the VEGP facility.

2. COL Application Part 8, PSP Figure 6, will be revised to incorporate the additional information that is added to Section 1.1, as depicted in Attachment 13.06-28 to this enclosure.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

Attachment 13.06-28: Draft PSP Figure 6, Vogtle Electric Generating Plant, Site Vicinity Map

eRAI Tracking No. 4140

NRC RAI Number 13.06-29:

Physical Security Plan (revision 1), dated March 31, 2009, Appendix C, Safeguards Contingency Plan, Section 8.4. Page C-37, last sentence, refers to additional security measures to be used for ground level doors. Clarify whether these additional security measures will be incorporated into the ground level doors outlined in AP-1000 COL Standard Technical Report APP-GW-GLR-66, Rev. 2, attachment 2, table 1.

SNC Response:

The additional security measures for the ground level doors that are discussed in the referenced section of the Safeguards Contingency Plan do not apply to VEGP Units 3 and 4. The SNC Physical Security Plan (PSP) is a fleet plan and the referenced "additional security measures" are applicable to one of the other SNC fleet plants. The AP1000 Combined License (COL) Standard Technical Report, APP-GW-GLR-066, Rev. 2, determined that AP1000 ground level doors do not need additional security measures beyond those indicated in the technical report. The response to this question does not necessitate a change to the PSP.

This response is PLANT-SPECIFIC for VEGP.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 4140

NRC RAI Number 13.06-30:

Physical Security Plan (revision 1), dated March 31, 2009, Appendix C, Safeguards Contingency Plan, Section 8.5. page C-38. 2nd paragraph, 3rd & 4th sentences, describes the involvement of offsite agencies (i.e. National Guards, FBI and Coast Guard) with the Site Assessment and drills and exercises conducted. Provide additional information on how Units 3 and 4 were actively involved with the Site Assessment and the types of drills and exercises that were conducted.

SNC Response:

The statement in Appendix C of the SNC PSP is related to the current SNC fleet plants. These drills and exercises are conducted periodically to update the supporting agencies referenced in the RAI on the protective measures in place at each plant. Prior to placing each of the VEGP Units 3 and 4 into operation, SNC will conduct meetings, drills and exercises to brief and update the emergency planning and security support agencies on the new units and their incorporation into the total site footprint and response actions. These site orientations will enable the supporting agencies to provide the needed support for the new units and integrate seamlessly into the security response and emergency response actions in accordance with the Law Enforcement Response Plan discussed in the PSP.

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

This response is PLANT-SPECIFIC for VEGP.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 4140

NRC RAI Number 13.06-31:

Physical Security Plan (revision 1), dated March 31, 2009, Appendix C, Safeguards Contingency Plan, Section 8.6. Page C-38 describes the implementation of a 1994 vehicle barrier system (VBS). Explain how the 1994 VBS is incorporated into the defense of the protected area around Units 3 and 4.

SNC Response:

The 1994 VBS discussed in Appendix C is currently in place at the three existing SNC fleet plants in order to comply with previous regulatory requirements. Each of the existing SNC fleet plants credits these vehicle barriers in their protective measures because they perform a valuable security function for these plants. However, each of the existing SNC fleet plants has also installed additional vehicle barriers in accordance with subsequent regulatory requirements. VEGP Units 3 and 4 will have a single VBS that is designed to meet the current requirements of 10 CFR 73.55 and will provide sufficient protection of the plant and associated assets from the Design Basis Threat vehicle bomb. The VBS for VEGP Units 3 and 4 is described in Section 11.2 of the VEGP Units 3 and 4 COL Application PSP.

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

This response is PLANT-SPECIFIC for VEGP.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None.

eRAI Tracking No. 4140

NRC RAI Number 13.06-32:

Physical Security Plan (revision 1), dated March 31, 2009, Appendix C, Safeguards Contingency Plan, Section 8.3. Page C-37 2nd paragraph refers to a delay fence. Confirm that this delay fence for Units 3 and 4 will incorporate the requirements described in the AP 1000 COL Standard Technical Report APP-GW-GLR-66, Rev 2.

SNC Response:

The delay fence discussed in the referenced paragraph of the PSP, Rev. 1, dated March 31, 2009, is the Red Zone fence discussed in the AP1000 COL Standard Technical Report APP-GW-GLR-66, Rev 2, and will incorporate the requirements described in this technical report.

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

This response is PLANT-SPECIFIC for VEGP.

Associated VEGP COL Application Revisions:

None.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

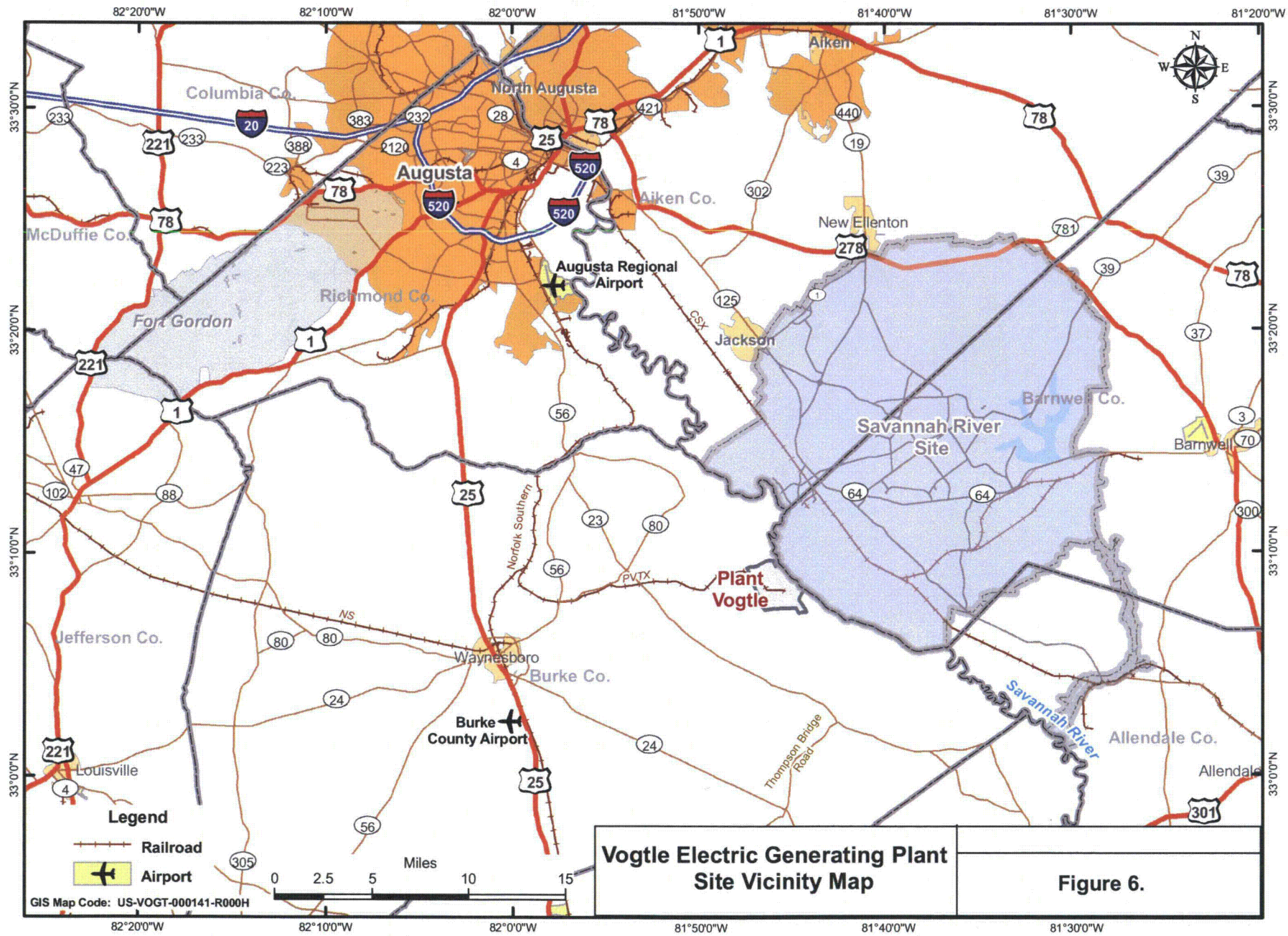
None.

Attachment 13.06-28

Draft PSP Figure 6

Vogtle Electric Generating Plant, Site Vicinity Map

NOTE: Attached is a single page figure.



**Vogtle Electric Generating Plant
Site Vicinity Map**

Figure 6.