

April 13, 2010

Mr. Scott Head, Manager
Regulatory Affairs
STP Nuclear Operating Company
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 402 RELATED TO
SRP SECTION 13.06 FOR THE SOUTH TEXAS PROJECT COMBINED
LICENSE APPLICATION

Dear Mr. Head:

By letter dated September 20, 2007, STP Nuclear Operating Company (STP) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U. S. Nuclear Regulatory Commission (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 safety analysis report, the staff requests that the RAI response include the proposed wording changes.

S. Head

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If you have any questions or comments concerning this matter, I can be reached at 301-415-5787 or by e-mail at Rocky.Foster@nrc.gov or you may contact George Wunder at 301-415-1494 or George.Wunder@nrc.gov.

Sincerely,

/RA/

Rocky D. Foster, Project Manager
ABWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-012, 52-013

eRAI Tracking No. 4589 and 4593

Enclosure:
Request for Additional Information

cc: William Mookhoek
Richard Bense

S. Head

-2-

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OFFICE	RSRLB	BC:RSRLB	NGE2/PM	NGE2/L-PM
NAME	VWilliams	DHuyck	RFoster	GWunder
DATE	4/01/2010	4/06/2010	4/06/2010	4/13/2010

***Approval captured electronically in the electronic RAI system.**

OFFICIAL RECORD COPY

Request for Additional Information No. 4589 Revision 3

**South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 13.06 - Physical Security
Application Section: 13.6**

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

13.06-1

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 11, when will STP finalize the facility layout of STP 3&4?

Regulatory Requirement: 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.

13.06-2

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 11, which NRC approved document(s) were utilized to calculate adversary and responder timelines, delay times, and probability of neutralization?

Regulatory Requirement: 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.

13.06-3

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 8, what does the statement, "the STP Units 3 & 4 will build on the security program already in place for STP Units 1 & 2" indicate? Please clarify this statement.

Regulatory Requirement: 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.

13.06-4

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 8, what is the final location of the secondary alarm station? Is the location of the Secondary Alarm Station an inspection requirement to meet the physical security hardware inspections, tests, analyses, and acceptance criteria?

Regulatory Requirement: 10 CFR 73.55(i)(4)(i) Both alarm stations must be designed and equipped to ensure that a single act, in accordance with the design basis threat of radiological sabotage defined in § 73.1(a)(1), cannot disable both alarm stations. The licensee shall ensure the survivability of at least one alarm station to maintain the ability to perform the following functions.

13.06-5

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 8, provide a general description of how South Texas Project units 3 & 4 Central and Secondary Alarm stations are designed, constructed, and located to be equal and redundant? Provide the following information in the general description:

- General description of CAS and SAS (exact locations, designations, Bullet resistance construction)
- SAS exact location and distance from CAS and protected area fence (drawing with CAS & SAS location).
- Communication systems used in both stations
- Intrusion detection system general description
- Perimeter camera general configuration for layout
- Security computer system location(s) general design
- Alarm station power supply
- Perimeter design/protection of perimeter equipment

Where are the detailed descriptions of the Central and Secondary Alarm Station design, construction and location documented to meet the physical security hardware inspections, tests, analyses?

Regulatory Requirement: 10 CFR 73.55(i)(4)(iii), 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.

13.06-6

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 9, provide the initial response location for all armed responders.

Regulatory Requirement: 10 CFR 73.55(k)(4), the licensee shall provide armed response personnel consisting of armed responders which may be augmented with armed security

officers to carry out armed response duties within predetermined time lines specified by the site protective strategy.

13.06-7

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 10, what process is utilized to keep approach areas clear at all times? Identify on a map the approach areas that are kept clear for the effective implementation of the protective strategy.

Regulatory Requirement: 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.

13.06-8

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 10, what are the specific response locations for internal responders?

Regulatory Requirement: 10 CFR Part 73, Appendix c, section II, paragraph B.3.c.(v)(3)The protective strategy shall: (3) Contain measures that limit the exposure of security personnel to possible attack, including incorporation of bullet resisting protected positions.

13.06-9

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 18, on a drawing, provide the location of the protected area internal road system.

Regulatory Requirement: 10 CFR 73.58(b), the licensee shall assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security.

13.06-10

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 18, what was the methodology and specific review areas of the safety/security evaluation for the implementation of the South Texas Project Units 3 & 4 protective strategy ?

Regulatory Requirement: 10 CFR 73.58(b) The licensee shall assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security.

13.06-11

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 6, “Assessment Overview”, are the two strategies discussed in the first paragraph the same? If not, what is the difference?

Regulatory Requirement: 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.

Request for Additional Information No. 4593 Revision 3

**South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 13.06 - Physical Security
Application Section: 13.6**

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

13.06-12

How does the operational security program address COL License Information Item 9.28, Plant Security System Criteria, continuous communications within the Nuclear Island with the central and secondary alarm stations?

Regulatory Requirement: 10CFR 73.55(j)(3) All on-duty security force personnel shall be capable of maintaining continuous communication with an individual in each alarm station, and vehicle escorts shall maintain continuous communication with security personnel. All personnel escorts shall maintain timely communication with the security personnel.

13.06-13

How does the operational security program address COL License Information Item 9.28, Plant Security System Criteria in preventing sabotage actions outside protected area from adversely impacting isolation zone and protected area illumination?

Regulatory Requirement: 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

13.06-14

Describe how the requirements of 10 CFR 73.58 for managing safety/security interface will be met. Provide descriptions in the FSAR (i.e., Part 2) that describe of how plant management controls and process will be applied to meet 10 CFR 73.58 to manage the safety/security for the South Texas Project Units 3 & 4.

Regulatory Reference: 10 CFR 73.58(a) and (b), each operating nuclear power reactor licensee with a license issued under part 50 or 52 of this chapter shall comply with the requirements of this section. The licensee shall assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security.

13.06-15

Does the final safety analysis report section 13.6 description of the Security program contain a complete listing of all security combined license information items? If no, add the additional security combined license information items that are not described.

Regulatory Requirement: 10 CFR 52 appendix A.IV.A.2.e, an applicant for a combined license that wishes to reference this appendix shall, in addition to complying with the requirements of 10 CFR 52.77, 52.79, and 52.80, comply with the following requirements: Information that addresses the COL action items.