Progress Energy

Serial: NPD-NRC-2010-031
April 14, 2010

10 CFR 52.79

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. 084 RELATED TO PHYSICAL SECURITY

Reference: Letter from Denise L. McGovern (NRC) to Garry Miller (PEF), dated March 8, 2010, "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"

Ladies and Gentlemen:

Progress Energy Florida, Inc. (PEF) hereby submits our response to the Nuclear Regulatory Commission's (NRC) request for additional information 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 responses provided in Enclosure 2 to this letter contain Security-Related Information, and accordingly, PEF requests Enclosure 2 be withheld from public disclosure under 10 CFR 2.390(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 April 14, 2010.

Sincerely,

John Elnitsky
Vice President
Nuclear Plant Development

Enclosures

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

Progress Energy Florida, Inc.
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LRO

Enclosure 1

Response to LNP-RAI-LTR-084

Related to Physical Security

PUBLIC VERSION – REDACTED

Levy Nuclear Plant Units 1 and 2
Response to NRC Request for Additional Information Letter No. 084 Related to SRP Section 13.6 for the Combined License Application, dated March 8, 2010

NRC RAI #	Progress Energy RAI #	Progress Energy Response
13.06-19	L-0738	Response enclosed – see following pages
13.06-20	L-0739	Response enclosed – see following pages
13.06-21	L-0740	Response enclosed – see following pages
13.06-22	L-0741	Response enclosed – see following pages
13.06-23	L-0742	Response enclosed – see following pages
13.06-24	L-0743	Response enclosed – see following pages
13.06-25	L-0744	Response enclosed – see following pages
13.06-26	L-0745	Response enclosed – see following pages
14.03.12-1	L-0746	Response enclosed – see following pages
14.03.12-2	L-0747	Response enclosed – see following pages
14.03.12-3	L-0748	Response enclosed – see following pages

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-19

Text of NRC RAI:

Physical Security Plan, (revision 2) dated September 3, 2009, Enclosure 2 (Erratum: Variances to Generic Guidance Provided by March 18, 209 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.

PGN RAI ID #: L-0738

PGN Response to NRC RAI:

The above five noted items were not addressed in Revision 2 of the LNP Physical Security Plan submitted to the NRC on September 3, 2009. These five items must be incorporated into the PSP to be consistent with Enclosure 2 of the PSP Rev 2 submittal dated September 3, 2009.

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

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-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-20

Text of NRC RAI:

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."

PGN RAI ID #: L-0739

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:

None.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-21

Text of NRC RAI:

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."

PGN RAI ID #: L-0740

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:

None.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-22

Text of NRC RAI:

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 license's capability to satisfy the requirements of this section.

PGN RAI ID #: L-0741

PGN Response to NRC RAI:

The parenthetical text was inserted to provide a reference to the guidance that was used to identify the listed vital areas. A more concise method would be to revise the sentence to read "(The following areas within the Protected Area were identified as Vital Areas using Regulatory Guide 5.76 Section C.4.10.2 guidance.)"

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

Associated LNP COL Application Revisions:

PSP Section 14.5 Page 20 revise from:

(For additional guidance refer to RG 5.76, C.4.10.2)

To read:

(The following areas within the Protected Area were identified as Vital Areas using Regulatory Guide 5.76 Section C.4.10.2 guidance)

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-23

Text of NRC RAI:

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;

PGN RAI ID #: L-0742

PGN Response to NRC RAI:

PGN intends to fully comply with 10 CFR 73.55(e)(7)(i), and SRP 14.3.12, Physical Security Hardware- ITAAC, #4a. PSP Section 15.3 will be revised to include IDS requirements for isolation zone size, capability to detect attempted and actual PA penetration, and alarm concurrently in the CAS and SAS as described in 10 CFR 73.55(e)(7)(i)(A) and (B), and SRP 14.3.12, Physical Security Hardware- ITAAC, #4a. PSP Section 15.4 describes the assessment equipment monitoring capability required by 10 CFR 73.55(e)(7)(i)(C) and SRP 14.3.12, Physical Security Hardware- ITAAC, #4b.

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

Associated LNP COL Application Revisions:

Revise LNP PSP Section 15.3 as follows:

Insert new second sentence to read:

Isolation zones are designed of sufficient size to permit observation and assessment of activities on either side of the protected area barrier.

Revise the fifth sentence to read:

The system is designed to detect both attempted and actual penetration of the protected area perimeter barrier before completed penetration of the PA perimeter barrier.

Insert new seventh sentence to read:

An intrusion alarm annunciates concurrently in the CAS and SAS.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-24

Text of NRC RAI:

Physical Security Plan, (revision 2) dated September 3, 2009, Appendix C, Safeguards Contingency Plan, Section 8, page C-28, 4th 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."

PGN RAI ID #: L-0743

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:

None.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-25

Text of NRC RAI:

Physical Security Plan, (revision 2) dated September 3, 2009, Appendix C, Safeguards Contingency Plan, section 7, page C-24, 1st 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.

PGN RAI ID #: L-0744

PGN Response to NRC RAI:

As described in DCD Section 13.6, the target sets in APP-GW-GLR-066 (TR 94) were used in the development of the AP1000 physical security system and identification of a defensive strategy for the AP1000 design. The target sets detailed in APP-GW-GLR-066 Attachment 1 do not necessarily represent the complete and final list of target sets for a specific AP1000 plant site. LNP will use the target sets identified in APP-GW-GLR-066 as a starting point for the development of the LNP site specific target sets. As described in the LNP PSP Appendix C Section 7 page C-24 first paragraph, with the WEC AP1000 target sets as a starting point, LNP will use an Expert Panel consisting of Security, PRA, Design Engineering, Systems Engineering and Licensing to develop the final LNP target sets. The criteria used to identify the final LNP target sets will be outlined in site procedures and will meet the intent of 10 CFR 73. The final target sets for LNP will be developed prior to fuel onsite (inside the protected area) and the NRC evaluated force of force exercise.

No changes to the PSP are required by this response.

Associated LNP COL Application Revisions:

None.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.06-26

Text of NRC RAI:

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."

PGN RAI ID #: L-0745

PGN Response to NRC RAI:

As stated in the LNP PSP Appendix C Section 8 third paragraph, the LNP protective strategy and response scenarios are based on those described and evaluated in the most current version of the AP1000 Safeguards Report (Westinghouse Technical Report APP-GW-GLR-066).

No change to the PSP is required by this response.

Associated LNP COL Application Revisions:

None.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 14.03.12-1

Text of NRC RAI:

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.

PGN RAI ID #: L-0746

PGN Response to NRC RAI:

The response to R-COLA RAI 14.03.12-1 (eRAI 4141) dated March 5, 2010 is also applicable to LNP 1 & 2 and does not require additional review.

Associated LNP COL Application Revisions:

The following changes will be made to the Levy COLA in a future revision:

1. COLA Part 2, FSAR, Section 13.6.1, Combined License Information Item, will be revised from:

Information for the Security Plan portion of this COL item is addressed in Section 13.6.

To Read:

[Reviewer's Note: The current left-margin annotation (LMA), STD COL 13.6-1, applies to both sentences.

Information for the Security Plan portion of this COL item is addressed in Section 13.6. Information for the Physical Security ITAAC portion of this COL item is addressed in Section 14.3.2.3.2.

2. COLA Part 2, FSAR, Section 14.3.2.3.2, Physical Security ITAAC (PS-ITAAC), will be revised from:

Generic PS-ITAAC have been developed in a coordinated effort between the NRC and the Nuclear Energy Institute (NEI) as outlined in Appendix C.II.I-C of Regulatory Guide 1.206. These generic ITAAC have been tailored to the AP1000 design and site-specific security requirements. Information for the Security Plan portion of this COL item is addressed in Section 13.6.

To Read:
[Reviewer's Note: A new left-margin annotation (LMA) STD COL 13.6-1 will be applied to this paragraph. The current LMA, STD SUP 14.3-1, applies only to Subsection 14.3.2.3.3, Other Site-Specific Systems.]

Generic PS-ITAAC have been developed in a coordinated effort between the NRC and the Nuclear Energy Institute (NEI). These generic ITAAC have been tailored to the AP1000 design and site-specific security requirements. Information for the Security Plan portion of this COL item is addressed in Section 13.6.

3. COLA Part 10, Proposed License Conditions (Including ITAAC), Appendix B, Inspections, Tests, Analyses, and Acceptance Criteria, Table 2.6.9-2 will be revised from:

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
1. The external walls, doors, ceiling, and floors in the location within which the last access control function for access to the protected area is performed are bullet resistant.	Type test, analysis, or a combination of type test and analysis will be performed for the walls, doors, ceilings, and floors in the location within which the last access control function for access to the protected area is performed.	A report exists and concludes that the walls, doors, ceilings, and floors in the location within which the last access control function for access to the protected area is performed are bullet resistant.
2. Physical barriers for the protected area perimeter are not part of vital area barriers.	An inspection of the protected area perimeter barrier will be performed to verify that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.	A report exists and concludes that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.
3. Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allow 20 feet of observation on either side of the barrier. Where permanent buildings do not allow a 20 foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier.	An inspection of the isolation zone will be performed to verify that the isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area which allows 20 feet of observation of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20 foot observation distance on the inside of the protected area barrier, the inspection will confirm that the building walls are immediately adjacent to, or an integral part of, the protected area barrier.	A report exists and concludes that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20 foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20 foot observation distance does not apply.
4. Intrusion detection system can detect penetration or attempted penetration of the protected area barrier.	Tests, inspections or a combination of tests and inspections of the intrusion detection system will be performed to verify the system can detect penetration or attempted penetration of the protected area barrier and that subsequent alarms annunciate in both the Central Alarm Station and Secondary Alarm Station.	A report exists and concludes that the intrusion detection system can detect penetration or attempted penetration of the protected area barrier and subsequent alarms annunciate in the Central Alarm Station and Secondary Alarm Station.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
5. Access control points are established to: (a) Control personnel and vehicle access into the protected area. (b) Detect firearms, explosives, and incendiary devices at the protected area personnel access points.	A test, inspection, or combination of tests and inspections of installed systems and equipment will be performed to verify that access control points to the protected area exist and that: (a) Personnel and vehicle access into the protected area is controlled. (b) Detection equipment is capable of detecting explosives, incendiary devices, and firearms at the protected area personnel access points.	A report exists and concludes that: (a) Access points for the protected area are configured to control access. (b) Detection equipment is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.
6. An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas without escort.	A test of the access control system with numbered picture badges will be performed to verify that unescorted access to protected areas is granted only to authorized personnel.	A report exists and concludes that the access authorization system with numbered picture badges can identify and authorize protected area access only to those personnel with unescorted access authorization.

To Read:

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
1. The external walls, doors, ceiling, and floors in the location within which the last access control function for access to the protected area is performed are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.	Type test, analysis, or a combination of type test and analysis will be performed for the external walls, doors, ceilings, and floors in the location within which the last access control function for access to the protected area is performed.	The external walls, doors, ceilings, and floors in the location within which the last access control function for access to the protected area is performed are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.
2. Physical barriers for the protected area perimeter are not part of vital area barriers.	An inspection of the protected area perimeter barrier will be performed.	Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
3.a) Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allow 20 feet of observation on either side of the barrier. Where permanent buildings do not allow a 20-foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier.	Inspections will be performed of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area.	Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply.
b) The isolation zones are monitored with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.	Inspections will be performed of the intrusion detection equipment within the isolation zones.	The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.
4. The intrusion detection system at the protected area perimeter: a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in both the Central Alarm Station and Secondary Alarm Station, and b) remains operable from an uninterruptible power supply in the event of the loss of normal power.	Tests, inspections or a combination of tests and inspections of the intrusion detection system at the protected area perimeter and its uninterruptible power supply will be performed.	The intrusion detection system at the protected area perimeter: a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station, and b) remains operable from an uninterruptible power supply in the event of the loss of normal power.
5. Access control points are established to: a) control personnel and vehicle access into the protected area.	Tests, inspections, or combination of tests and inspections of installed systems and equipment at the access control points to the protected area will be performed.	The access control points for the protected area: a) are configured to control personnel and vehicle access.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
b) detect firearms, explosives, and incendiary devices at the protected area personnel access points.		b) include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.
6. An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas and vital areas without escort.	A test of the access control system with numbered picture badges will be performed.	The access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization.
7. Access to vital equipment physical barriers requires passage through the protected area perimeter barrier.	Inspection will be performed to confirm that access to vital equipment physical barriers requires passage through the protected area perimeter barrier.	Vital equipment is located within a protected area such that access to vital equipment physical barriers requires passage through the protected area perimeter barrier.
8.a) Penetrations through the protected area barrier are secured and monitored.	Inspections will be performed of penetrations through the protected area barrier.	Penetrations and openings through the protected area barrier are secured and monitored.
b) Unattended openings (such as underground pathways) that intersect the protected area must be protected by a physical barrier and monitored.	Inspections will be performed of unattended openings within the protected area barriers.	Unattended openings (such as underground pathways) that intersect the protected area barrier are protected by a physical barrier and monitored.
9. Emergency exits through the protected area perimeter are alarmed and secured with locking devices to allow for emergency egress.	Tests, inspections, or a combination of tests and inspections of emergency exits through the protected area perimeter will be performed.	Emergency exits through the protected area perimeter are alarmed and secured by locking devices that allow prompt egress during an emergency.

Attachments/Enclosures:

Per R-COLA RAI 14.03.12-1 (eRAI 4141) response dated March 5, 2010.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 14.03.12-2

Text of NRC RAI:

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.

PGN RAI ID #: L-0747

PGN Response to NRC RAI:

The response to R-COLA RAI 14.03.12-2 (eRAI 4141) dated March 5, 2010 is also applicable to LNP 1 & 2 and does not require additional review.

Associated LNP COL Application Revisions:

No COLA revisions have been identified associated with this response.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-084

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 14.03.12-3

Text of NRC RAI:

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.

PGN RAI ID #: L-0748

PGN Response to NRC RAI:

The response to R-COLA RAI 14.03.12-3 (eRAI 4141) dated March 5, 2010 is also applicable to LNP 1 & 2 and does not require additional review.

Associated LNP COL Application Revisions:

No COLA revisions have been identified associated with this response.

Attachments/Enclosures:

None.