

CCNPP3COLA PEmails

From: Arora, Surinder
Sent: Tuesday, April 13, 2010 1:32 PM
To: 'Poche, Robert'; 'cc3project@constellation.com'
Cc: CCNPP3COL Resource; Huyck, Doug; Lee, Pete; Colaccino, Joseph; Chowdhury, Prosanta; Biggins, James; Vrahoretis, Susan; Hair, Christopher
Subject: DRAFT RAI 231 RSRLB 3831
Attachments: DRAFT RAI 231 RSRLB 3831.doc

Rob,

Attached is DRAFT RAI No. 231 (eRAI No. 3831). You have until April 27, 2010 to review it and decide whether you need a conference call to discuss any questions in this RAI before the final issuance. After the phone call or on April 27, 2010, the RAI will be finalized and sent to you for response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Thanks.

SURINDER ARORA, PE
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Subject: DRAFT RAI 231 RSRLB 3831
Sent Date: 4/13/2010 1:31:36 PM
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From: Arora, Surinder

Created By: Surinder.Arora@nrc.gov

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Request for Additional Information No. 231 (eRAI 3831)

4/13/2010

Calvert Cliffs Unit 3

UniStar

Docket No. 52-016

SRP Section: 13.06.01 - Physical Security - Combined License

Application Section: Application Sections: Part 8, Calvert Cliffs Nuclear Power Plant Unit 3 Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, Revision 3

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

13.06.01-1

(U) Section 1.0, Introduction (Page 1): Indicate reference to regulatory requirements set forth in 10 CFR 52.79(a)(35)i, 52.79(a)(36)(i) and (ii) in lieu of “10 CFR 50.34(c) and (d),” for new reactors.

(U) Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires that information provided “shall be complete and accurate in all material respects.” Subpart C of 10 CFR 52 establishes the regulatory requirements for CCNPPU3 combined license application. The security plan must meet requirements of 10 CFR 52 for Part 52 license, not requirements of 10 CFR 50 as stated.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-2

(U) Section 1.1, Facility Physical Layout (page 1): Provide information required in accordance with 10 CFR 73, Appendix C, Section II (B)(3)(b), Physical Layout.

(U) Regulatory Basis: Title 10 CFR 73, Appendix C, Section II (B)(3)(b), Physical Layout, requires the safeguards contingency plan to “include a site map depicting the physical structures located on the site, including onsite independent spent fuel storage installations, and a description of the structures depicted on the map. Plans must also include a description and map of the site in relation to nearby towns, transportation routes (e.g., rail, water, and roads), pipelines, airports, hazardous material facilities, and pertinent environmental features that may have an effect upon coordination of response activities. Descriptions and maps must indicate main and alternate entry routes for law enforcement or other offsite response and support agencies and the location for marshaling and coordinating response activities.” Applicant has not provided appropriate detailed of information required in the PSP or Contingency Plan or referenced the appropriate documentation that contains such information to meet stated requirement.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-3

(U) Section 2, Performance Objectives (5th sentence, Page 2): State appropriately the reference to 10 CFR 73, or indicate all other specific parts of 10 CFR 73 for requirements for design of a physical protection systems and programs for CCNPPU3 in the 5th sentence of the paragraph.

(U) Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires that the information provided “shall be complete and accurate in all material respects.” The performance and prescriptive requirements for physical protection of power reactors are described in various sections of 10 CFR 73, in addition to those stated in 10 CFR 73.55. The statement that “The physical protection system and programs described here in are designed to protect against the Design Basis Threat (DBT) of radiological sabotage in accordance with the specific requirements of 10 CFR 73.55 (a) through (r) or equivalent measures that meets the same high assurance objectives provided by paragraph (a) through (r),” did not address descriptions included in the security plan for meeting 10 CFR 73.56 (access authorization described in Section 14.1), 10 CFR 26 (fitness for duty described in Section 14.1), 10 CFR 73.58 (safety/security interface requirements - not described or discussed), and 10 CFR 73.54 (digital systems security briefly described in Section 23).

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-4

(U) Section 4.1, Security Organization Management: Delete “Updated” in “Updated Final Safety Analysis Report” and delete “U” from “UFSAR.”

(U) Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” The facility management organization is outlined in the CCNPPU3 Final Safety Analysis Report, as titled in the COL application, Part 2. Update to FSAR is performed after licensing and would be identified as “UFSAR”. For the purpose the COL application, FSAR is the appropriate and accurate reference to Part 2 of the application. Statement indicated on Page C-17 of the Safeguards Contingency Plan, Section 4.1, Licensee Organization, is an acceptable method of referencing to the FSAR.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked

and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-5

(U) Section 14.2, Insider Mitigation Program (Page14): Provide clarification on whether the statement “utilizing the guidance provided in Regulatory Guide 5.75” means implementing the insider mitigation program in accordance with all portions of the guidance provided in Regulatory Guide 5.77, Insider Mitigation Program, as the licensing basis for meeting 10 CFR 73.55(a)(9).

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(a)(9) requires an applicant to provide program and physical protection against insider threat, as characterized by the adversarial characteristics of the design basis threat.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-6

(U) Section 14.4.5, Protected Area Access Controls (2nd paragraph, Page 18): Provide design information on the types of “appropriate technology” that will be used (or will be appropriate) for providing PA access control.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and 10 CFR 73.55(h) requires maintaining reliable and available search capabilities of persons and materials at all time. The design of physical protection systems (i.e., PA access control systems) that are beyond the scope of the DC is required as COL Information Item 13.6.1. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” Also, Title 10 CFR 52.80(a) requires the application to contain information for ITA and criteria necessary and sufficient to provide reasonable assurance that the facility has been constructed and will operate in conformity with the combined license, the provisions of the Act, and the Commission’s rules and regulations. The detail of systems and configuration of personnel and vehicle search trains (i.e., systems) should be in accordance with RG 1.206 to provide sufficient information for detail design. The information is site specific description bracketed text identified in NEI 03-12 template for security plans.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-7

(U) Training and Qualification Plan, Section 3.6.4, Firearms Qualification Courses and Section 3.6.4.1, Course of Fire (Pages B-11 and B-12): Remove reference to enhanced weapons.

(U) Regulatory Basis: Current NRC regulation does not include or authorize the use of enhanced weapons at reactor licensees. The training and qualification plan indicates qualification for weapon and courses of fire for “enhanced weapons” that is under consideration for rulemaking, and the use of enhanced weapon is not yet authorized. In addition, Section 9.0 of the Physical Security Plan does not specify or plans for the use of enhanced weapons.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-8

(U) Safeguards Contingency Plan, Section 4.1.1, Duties/Communications Protocols and Section 4.1.2, Security Chain of Command/Delegation of Authority (Pages C-17 and C-18): Reconcile the term “Armed Response Team Leader” and “Response Team Leader (Security Shift Supervisor)” indicated on Page C-17 and C-18.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” The applicant uses different terms that seem to refer to the same security position.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-9

(U) Safeguards Contingency Plan, Section 4.1.2, Security Chain of Command/ Delegation of Authority (Page C-18): Provide revision to training requirement for CAS and SAS operators in T&Q Plan Table 1 Critical Task Matrix, Pages B-15 to B-24, based on stated qualification also as a Response Team Leader (i.e., Tasks 4, 5, 6, 14, 22,25, 27, and 28 are required for RTL, but are not currently indicated as required for CAS and SAS operators stated as “RTL qualified”).

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” Section 4.1.2 states that CAS and SAS operators are “RTL qualified.” Training matrix in Appendix B does not include all training tasks for CAS and SAS operators to qualify as RTL.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-10

(U) Safeguards Contingency Plan, Section 4.3, Safeguards Systems (Page C-19): Clarify whether the “design documents” include the “Calvert Cliffs Nuclear Power Plant Unit 3 Security Assessment” Revision 4” describing the design and licensing bases submitted with Part 8 of the application. In addition, define “Safeguards Systems” and “Physical Protection System” as used in Section 2, Performance Objective of the PSP (Page 2) to clarify the differences between the two terms used in the security plans.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.”

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-11

(U) Safeguards Contingency Plan, Section 4.5, Policy Constraints and Assumptions (Page C-19): Clarify and define the individual designated as “Security Operations Leader and/or Security Operations Team Leader.” Include as appropriate in the definitions identified in Appendix A of the PSP, and identify critical tasks required for training and qualification in the T&Q Plan.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” Security Operations Leader and/or Security Operations Team Leader are not defined in the PSP and the position is identified in Table 1, Critical Task Matrix, of the T&Q Plan.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-12

(U) Safeguards Contingency Plan, Section 7, Primary Security Functions (3rd paragraph, Page C-23): Provide clarification on how CCNPPU3 target sets are based on “Emergency Operating Procedures (EOP) safety functions and fission barriers preservations.” Describe how this was included in discussions of target sets in either CCNPPU3 Security Assessment or in AREVA Technical Report ANP-10295.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and 10 CFR 73.55(h) requires maintaining reliable and available search capabilities of persons and materials at all time. Target sets identified by the applicant in accordance with 10 CFR 73.55(f) are SSC that the applicant will protect based on the DBT. The AREVA Technical Report ANP-10925 incorporated by reference and CCNPPU3 Security Assessment does not mention target sets based on EOP safety functions or fission barrier preservation. Statement (as stated in NEI 03-12 template language) is not supported by referenced technical reports.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-13

(U) Safeguards Contingency Plan, Section 8, Protective Strategy (1st paragraph, 7th line, Page C-25): Clarify whether the stated “Armed Responders (AR)” should include “Armed Security Officers” as described in Section 18, Response Requirements, of the CCNPPU3 Physical Security Plan on Page 26.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and 10 CFR 73.55(h) requires maintaining reliable and available search capabilities of persons and materials at all time. Armed Security Officers are credited in implementing the site protective strategy in the PSP and in CCNPPU3 Security Assessment.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

13.06.01-14

(U) Safeguards Contingency Plan, Section 8, Protective Strategy (Page C-24 through C-28): Indicate reference to CCNPPU3 Security Assessment for descriptions of details summarized in Section 8 of the Contingency Plan.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and 10 CFR 73.55(h) requires maintaining reliable and available search capabilities of persons and materials at all time. The descriptions and details for design and technical assumptions for summary of protective strategy for detection, assessment, communications, delay and response, including integration of programmatic requirements for IMP for Section 8 are described in the CCNPPU3 Security Assessment and AREVA Technical Report ANP-10295 of the US-EPR DC incorporated by reference.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

(U) Part 8, Physical Security Plan, Section 4, Establishment of Security Organization and FSAR Chapter 13, Sub-Section 13.1: Describe the authority and line of communications of the security organization within the CCNPP Unit 3 site organization structure in FSAR Section 13.1, "Organization Structure of Applicant." Please include descriptions to clearly explain the roles and responsibilities and where the security organization resides figure that describes the CCNPP Unit 3 site organization.

(U) Regulatory Basis: Title 10 CFR 73.55(d), "Security Organization," requires the applicant to establish and maintain a security organization. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects." The PSP, Section 4, states that the FSAR describes the security organization. However, Chapter 13.0, Conduct of Operations, of the FSAR only includes a description of the corporate and site organization structures and describes some security functions under the Vice President - Technical Support for the corporate organization and training responsibilities within the CCNPP Unit 3 site organization. Additional information is needed on where the operations security organization will reside within the site organization structure and whether independences exists between the organization responsible for security and the site power production organization to ensure that there are no conflicts between the goals of security and production of power.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.