

PMNorthAnna3COLPEmails Resource

From: Jessie, Janelle
Sent: Monday, April 12, 2010 1:37 PM
To: Wanda D Craft; Regina Borsh
Cc: Patel, Chandu
Subject: FW: North Anna Physical Security RAI Letter 45 Issued
Attachments: NA PSP RAIs 13.06.01 - ML1010200514.pdf

Hi Wanda,

Attached is a pdf version of the RAIs.

Thanks

Janelle

From: Jessie, Janelle
Sent: Monday, April 12, 2010 1:20 PM
To: Regina Borsh; 'Wanda D Craft'
Cc: Patel, Chandu
Subject: North Anna Physical Security RAI Letter 45 Issued

Good Afternoon Gina,

FYI: North Anna RAI Letter 45 for Physical Security has been issued.

The ML number is ML101020051.

Thanks

Janelle

Janelle B. Jessie
Project Manager
U.S. Nuclear Regulatory Commission
Office of New Reactors
Division of New Reactor Licensing
NGE1 Projects Branch
301-415-6775
janelle.jessie@nrc.gov

God makes three requests of his children: Do the best you can, where you are, with what you have, now. Do not worry about tomorrow; for tomorrow will care for itself. Each day has enough trouble of its own.

Hearing Identifier: NorthAnna3_Public_EX
Email Number: 862

Mail Envelope Properties (65FB43187ED87C46B3F00CB97D081E60D547AB78)

Subject: FW: North Anna Physical Security RAI Letter 45 Issued
Sent Date: 4/12/2010 1:36:35 PM
Received Date: 4/12/2010 1:36:36 PM
From: Jessie, Janelle

Created By: Janelle.Jessie@nrc.gov

Recipients:

"Patel, Chandu" <Chandu.Patel@nrc.gov>
Tracking Status: None
"Wanda D Craft" <wanda.d.craft@dom.com>
Tracking Status: None
"Regina Borsh" <regina.borsh@dom.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	955	4/12/2010 1:36:36 PM
NA PSP RAIs 13.06.01 - ML1010200514.pdf		121396

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

April 12, 2010

Mr. Eugene S. Grecheck
Vice President - Nuclear Development
Dominion
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 045
(SRP SECTIONS: 13.06.01 - PHYSICAL SECURITY - COMBINED LICENSE)
RELATED TO THE NORTH ANNA UNIT 3 COMBINED LICENSE
APPLICATION

Dear Mr. Grecheck:

By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a combined license application for North Anna Unit 3 pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Dominion is requested to respond within 45 days of the date of this letter. If the RAI response involves changes to application documentation, Dominion is requested to include the associated revised documentation with the response.

Should you have questions, please contact me at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
ESBWR/ABWR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-017

Enclosure: Request for Additional Information

April 12, 2010

Mr. Eugene S. Grecheck
Vice President - Nuclear Development
Dominion
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 045
(SRP SECTIONS: 13.06.01 - PHYSICAL SECURITY - COMBINED LICENSE)
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APPLICATION

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By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a combined license application for North Anna Unit 3 pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Dominion is requested to respond within 45 days of the date of this letter. If the RAI response involves changes to application documentation, Dominion is requested to include the associated revised documentation with the response.

Should you have questions, please contact me at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
ESBWR/ABWR Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-017
E-RAI Tracking No: 4461, 4520, 4575
Enclosure: Request for Additional Information
Distribution:
CPatel, NRO
NRO_DNRL_NGE1
SGreen, NRO
JJessie, NRO
ADAMS Accession No.: ML101020051
JJohnson, NSIR
PPrescott, NSIR
JFrost, NSIR
DHuyck, NSIR

OFFICE	TR: NSIR/RSRLB	BC: NSIR/RSRLB	PM:DNRL:NGE1	PM:DNRL:NGE1
NAME	JJohnson*	DHuyck*	JJessie*	CPatel*
DATE	3/26/10	3/26/10	3/29/10	4/8/10

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

**Request for Additional Information
North Anna, Unit 3
Dominion
Docket Number 52-017**

**SRP Section: 13.06.01 - Physical Security - Combined License
Application Section: 13.6**

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

13.06.01-46

ITAAC # 1

North Anna 3, R-COL application revision 1, Part 10, Combine License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), addresses the GE Hitachi Design Control Document (DCD), Tier 1, Table 2.19-1, revision 6, as providing specific design commitments and ITAAC for the physical security system to be used by North Anna 3 as an alternative method to the SRP 14.3.12, Physical Security Hardware-ITAAC (PS-ITAAC). The GE Hitachi DCD is being revised (RAI 14.3-440 S01 response letter 4/11/09) to address the new Part 73.55 rule requirements. Review and confirm that the PS-ITAAC listed below properly reflects the licensee's intentions based on the SRP and the most current revision of the DCD.

Listed below are the PS-ITAAC reference numbers from DCD, Tier 1 Table 2.19-1, which 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 2.1.9-1 # 1a	SRP Appendix "A" #1
DCD Table 2.1.9-1 # 13a	SRP Appendix "A" #13a
DCD Table 2.1.9-1 # 14a	SRP Appendix "A" #14a

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.

13.06.01-47

ITAAC # 2

North Anna 3, R-COL application revision 1, Part 10, Combined License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), section 2.2 states that Physical Security ITAAC (PS-ITAAC) are contained in the DCD Tier 1. The GE Hitachi DCD is being revised (RAI 14.3-440 S01 response letter 4/11/09) to address the new Part 73.55 rule requirements. The current revision of the DCD deleted several PS-ITAAC that were outside of the scope of the DCD. Review and confirm each PS-ITAAC listed below to verify that it properly reflects the licensee's intentions based on the SRP and the most current revision of the DCD. Verify and provide the status of any tentative COL action items assigned based on DCD

changes. Explain what actions the licensee will take to revise PS-ITAAC to reflect the licensee's intentions in the R-COL application.

The below ITAAC reference numbers from (DCD), Tier 1, Table 2.19-1, revision 6, 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 2.1.9-1 # 2a	SRP Appendix "A" #2a
DCD Table 2.1.9-1 # 2b	SRP Appendix "A" #2b
DCD Table 2.1.9-1 # 2c	SRP Appendix "A" #2c
DCD Table 2.1.9-1 # 3a	SRP Appendix "A" #3a
DCD Table 2.1.9-1 # 3b	SRP Appendix "A" #3b
DCD Table 2.1.9-1 # 3c	SRP Appendix "A" #3c
DCD Table 2.1.9-1 # 4a	SRP Appendix "A" #4a
DCD Table 2.1.9-1 # 4b	SRP Appendix "A" #4b
DCD Table 2.1.9-1 # 4c	SRP Appendix "A" #4c
DCD Table 2.1.9-1 # 5	SRP Appendix "A" #5
DCD Table 2.1.9-1 # 7	SRP Appendix "A" #7
DCD Table 2.1.9-1 # 8a	SRP Appendix "A" #8a
DCD Table 2.1.9-1 # 8b	SRP Appendix "A" #8b
DCD Table 2.1.9-1 # 9	SRP Appendix "A" #9
DCD Table 2.1.9-1 # 11c	SRP Appendix "A" #11c
DCD Table 2.1.9-1 # 11b	SRP Appendix "A" #11c

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.

13.06.01-48

ITAAC # 3

North Anna 3, R-COL application revision 1, Part 10, Combined License Application (including Inspection, Testing, Analyses, and Acceptance Criteria (ITAAC), section 2.2 states that Physical Security PS-ITAAC are contained in the DCD Tier 1. The GE Hitachi DCD is being revised (RAI 14.3-440 S01 response letter 4/11/09) to address the new Part 73.55 rule requirements. The current revision of the DCD does not fully address the PS-ITAAC listed below. Explain how North Anna 3, will address these PS-ITAAC areas. Explain what actions the licensee will take to revise the PS-ITAAC to reflect the licensee's intentions in the R-COL application.

The below ITAAC reference numbers from (DCD), Tier 1, Table 2.19-1, revision 6, have been cross-referenced with NUREG-800 Standard Review Plan (SRP) 14.3.12 Appendix "A" for clarification (ADAMS Accession Number: ML ML092600348).

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.

DCD Table 2.1.9-1 # 1b	SRP Appendix "A" #1a
DCD Table 2.1.9-1 # 6a	SRP Appendix "A" #6
DCD Table 2.1.9-1 # 10a	SRP Appendix "A" #10
DCD Table 2.1.9-1 # 11a	SRP Appendix "A" #11a
DCD Table 2.1.9-1 # 11b-1	SRP Appendix "A" #11b
DCD Table 2.1.9-1 # 12a	SRP Appendix "A" #12
DCD Table 2.1.9-1 # 13b-1	SRP Appendix "A" #13b
DCD Table 2.1.9-1 # 15a	SRP Appendix "A" #15
DCD Table 2.1.9-1 # 16a-1	SRP Appendix "A" #16a
DCD Table 2.1.9-1 # 16b-1	SRP Appendix "A" #16b
DCD Table 2.1.9-1 # 16c-1	SRP Appendix "A" #16c

13.06.01-49

1a) Describe how North Anna Unit 3 will address the COL action items 13.6-16-A, 13.6-17A, 13.6-18-A and 13.6-19-A, which are captured in the ESWR, 26A6642BL Revision 6, DCD/Tier 2.

1b) Figure 20 of the North Anna Unit 3 does not provide sufficient detail to indicate the locations of the external bullet resisting enclosures required by COL action item 13.6-16-A. Provide an adequate drawing to satisfy this requirement and apply appropriate language, to the appropriate sections of the security plan.

Regulatory Basis: 10 CFR 52.79(2). The final safety analysis report must demonstrate that the interface requirements established for the design under subsection 52.47 have been met.

10 CFR 52.79(3): The final safety analysis report must demonstrate that all requirements and restrictions set forth in the referenced design certification rule, other than those imposed under subsection 50.36b, must be satisfied by the date of issuance of the combined license. Any requirements and restrictions set forth in the referenced design certification rule that could not be satisfied by the time of issuance of the combined license, must be updated to account for site-specific design information and any design changes or departures.

10 CFR 52.79(3)(e): If the combined license application references the use of one or more manufactured nuclear power reactors licensed under subpart F of this part, then the following requirements apply: (1) The final safety analysis report need not contain information or analyses submitted to the Commission in connection with the manufacturing license, provided, however, that the final safety analysis report must either include or incorporate by reference the manufacturing license final safety analysis report and must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the site characteristics fall within the site parameters specified in the manufacturing license. In addition, the plant-specific PRA information must use the PRA information for the manufactured reactor and must be updated to account for site-specific design information and any design changes or departures. (2) The final safety analysis report must demonstrate that the interface requirements established for the design have been met.

10 CFR 52.47(a)(25): The interface requirements to be met by those portions of the plant for which the application does not seek certification. These requirements must be sufficiently detailed to allow completion of the FSAR;

13.06.01-50

13.6-7-A, Physical Security Plan may not capture all of the details of RAI response 13.6.01-24. Is the report identified in RAI 13.6.01-24 reflected back in the FSAR?

Regulatory Basis: 10 CFR 52.79(2): The final safety analysis report must demonstrate that the interface requirements established for the design under subsection 52.47 have been met.

10 CFR 52.79(3): The final safety analysis report must demonstrate that all requirements and restrictions set forth in the referenced design certification rule, other than those imposed under subsection 50.36b, must be satisfied by the date of issuance of the combined license. Any requirements and restrictions set forth in the referenced design certification rule that could not be satisfied by the time of issuance of the combined license, must be updated to account for site-specific design information and any design changes or departures.

10 CFR 52.79(3)(e): If the combined license application references the use of one or more manufactured nuclear power reactors licensed under subpart F of this part, then the following requirements apply: (1) The final safety analysis report need not contain information or analyses submitted to the Commission in connection with the manufacturing license, provided, however, that the final safety analysis report must either include or incorporate by reference the manufacturing license final safety analysis report and must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the site characteristics fall within the site parameters specified in the manufacturing license. In addition, the plant-specific PRA information must use the PRA information for the manufactured reactor and must be updated to account for site-specific design information and any design changes or departures. (2) The final safety analysis report must demonstrate that the interface requirements established for the design have been met.

10 CFR 52.47(a)(25): The interface requirements to be met by those portions of the plant for which the application does not seek certification. These requirements must be sufficiently detailed to allow completion of the FSAR;

13.06.01-51

Physical Security Plan, Section 19.1, page 36, 1st bullet. There is missing template language in this bullet. Provide missing NEI 03-12 template text or justify its exclusion.

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.

13.06.01-52

General Comment, Part 8, Physical Security Plan, Section 2, Performance Objectives (Page 2), and Section 17, Review, Evaluation and Audit of the Physical Security Program (Page 34):

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 North Anna Unit 3.

Regulatory Basis: Subpart C of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 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. Title 10 (10 CFR) 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” Title 10 (10 CFR) 73.58 states that each 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. The application did not include descriptions, in any parts of the application, on how plant management controls and processes will address the management of safety/security interface to meet requirements of 10 CFR 73.58. The applicant's description for the management of safety/security interface indicated in Part 8, Section 17, Review, Evaluation and Audit of the Physical Security Program, did not adequately address how applicant will manage and plan to implement safety/security interface in accordance with regulatory requirements. Section 17 only addressed reviews and audits of program no longer than 12 months after changes. The descriptions of how the applicant will apply plant's management controls and processes to provide assurance that safety/security interface will be adequately managed should not be described in Part 8, security plans. Security plan should reference the requirements in described in the FSAR for completeness.