PMComanchePekNPEm Resource

From: Takacs, Michael
Sent: Wednesday, April 21, 2010 4:18 PM
To: ron_reynolds@mnes-us.com; Donald.Woodlan@luminant.com
Cc: Robert.Reible@luminant.com; Lee, Pete; Otto, Ngola; ComanchePeakCOL Resource; Monarque, Stephen
Subject: MHI & Luminant site briefings for the Physical Security Audit May 10 - 13

Don and Ron,

As I mentioned on the phone call to each of you this afternoon, I wanted to capture from the *draft* audit plans for MHI and Luminant, the subject matter for the brief overviews requested by NRC technical staff. This is only a suggestion to help kick-off the audit on Monday afternoon (May 10th @ 2:00pm). Perhaps a site tour would be preferred that afternoon with the briefings to occur on the following Tuesday morning - it's your call.

Give me a call if you have any concerns or questions.

For the MHI/MNES DCD audit:

NRC staff requests MHI to provide a **brief overview** of revised approach and results in the latest revision of MHI TR UAP-SGI-08001 that is intended to identify a complete and accurate list of vital equipment. The overview should include list of all systems, equipment, and components that would be identified as vital equipment in accordance with the definition of vital equipment as stated in 10 CFR 73.2. A similar overview is requested of the methodology applied in MHI TR UAP-SGI-08002, to systematically identify a minimum standard target sets and locations that will be protected against the DBT for radiological sabotage, and the design and technical bases (i.e., internal protective strategy, pathway and task analysis, defense-in-depth) supporting the design of physical protection systems. A detailed briefing of analysis and results of referenced UAP-SGI-10001, "Blast Analysis for the Standard Plant," should be provided. The interfaces required between the certified design and the COL applicant should be included.

For the Comanche Peak RCOLA audit:

NRC staff requests Luminant to provide a **brief overview** of design and performance requirements and key assumptions of a physical protection system (as listed below) to meet regulatory requirements and intended to provide meet performance requirements of a high assurance of adequate protection against the DBT of radiological sabotage.

- Luminant application of Appendix A, "Example Protective Strategy for US-APWR Reference Plant," of MHI TR UAP-SGI-08002, Revision 1, in whole or in parts as the design and licensing bases for the description of required physical protection in Part 2 or Part 8 of the COL application.

- PSP, Section 11.1, Owner Controlled Area (OCA) Barriers: Design and performance requirements for activation of vehicle barriers as stated in Section 11.1.

- PSP, Section 11.2, Vehicle Barriers and Section 11.3, Protected Area Barriers: Design and performance requirements and configurations of: the sally port; passive and active vehicle barriers; PA intrusion detection systems; Access Control Building; protection against unauthorized train; channeling barriers; and alternate PA vehicle access.

- PSP, Section 11.2.3, Waterborne Threat Measures: Analysis of postulated blasts of vehicle bombs and results supporting the conclusion that ". . . found to be acceptable for performing their functions." Blast analysis (land and waterborne) technical basis addressing adequacies of safe-standoff distances for all modes of operations.

- PSP, Section 11.5, Target Set Equipment: Descriptions of target set equipment not within a PA or VA and the design and requirements for a physical protection system (detection, assessment, delays, and response). Luminant determined final target sets addressing site specific SSC and credited operator actions, including locations of equipment credited, as target set elements and physical protection system

- PSP, Section 11.6, Delay Barriers: Design and performance requirements, locations, and system configurations of delay barriers facilitating security response and analyzed and assumed in adversarial timelines.

- PSP, Section 18, Response Requirements: Evaluation and analysis supporting the minimum number of armed responders and arm security officers, and design of physical protection systems or features relied on by security responders. Specific supporting information include how the minimum numbers will be adequately deployed to provide defense-in-depth protection (i.e., analyzed scenarios, pathways evaluated, calculated responder timelines, planned overlapping fields of fire, protection against vertical ascent of VA barriers, calculated adversaries time lines for scenarios from points of detection to the VA barriers, assumptions for delays, analyzed scenarios using waterborne vehicles, etc.) .

Thanks,

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