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SOUTHERN COMPANY

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52-026

ND-10-0886

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Units 3 and 4 Combined License Application
Response to Request for Additional Information Letter No. 047, Supplement 2
Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (PS-ITAAC)

Ladies and Gentlemen:

By letter dated March 28, 2008, Southern Nuclear Operating Company (SNC) submitted an application for combined licenses (COLs) for proposed Vogtle Electric Generating Plant (VEGP) Units 3 and 4 to the U.S. Nuclear Regulatory Commission (NRC) for two Westinghouse AP1000 reactor plants, in accordance with 10 CFR Part 52. During the NRC's detailed review of this application, the NRC identified a need for additional information required to complete their review of the COL application's Final Safety Analyses Report (FSAR) Section 13.6, "Security," and the proposed Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (PS-ITAAC) that was submitted to the NRC for review on April 1, 2009. By letter received February 4, 2010, the NRC provided SNC with Request for Additional Information (RAI) letter No. 047 concerning this information need. SNC provided responses to the RAI letter No. 047 questions in a letter dated March 5, 2010. Based on NRC feedback provided in a phone call on April 1, 2010, SNC is providing a revision to its response to RAI 14.03.12-1, which was provided in the March 5, 2010 letter. The enclosure to this letter provides SNC's revised response to this RAI. The text that is revised by this response is annotated with a vertical change bar in the right-hand margin of the enclosure and associated attachment.

This letter identifies changes that will be made to a future revision of the VEGP Units 3 and 4 combined license application (COLA) to address NRC requirements in 10 CFR Parts 52 and 73.

If you have any questions regarding this letter, please contact Mr. Wes Sparkman at (205) 992-5061.

D092
NRO

Mr. B. L. Ivey states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY

B. L. Ivey

Sworn to and subscribed before me this 11th *day of* June, 2010

Notary Public: Nancy L. Henderson

My commission expires: March 23, 2014

BLI/BJS

Enclosure: Revised Response to RAI 14.03.12-1 from NRC RAI Letter No. 047 on the VEGP Units 3 & 4 COL Application involving the Physical Security Inspections, Tests, Analyses, and Acceptance Criteria

cc: Southern Nuclear Operating Company
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Southern Nuclear Operating Company

ND-10-0886

Enclosure

Revised Response to RAI 14.03.12-1 from NRC RAI Letter No. 047 on the VEGP Units 3 & 4 COL Application involving the Physical Security Inspections, Tests, Analyses, and Acceptance Criteria

NOTE: The enclosed document is eight (8) pages in length.

By letter received February 4, 2010, the U.S. Nuclear Regulatory Commission (NRC) provided Southern Nuclear Operating Company (SNC) with Request for Additional Information (RAI) letter No. 047. RAI letter No. 047 identified a need for additional information required to complete the NRC staff's review of SNC's Combined License (COL) application Final Safety Analyses Report (FSAR) Section 13.6, "Security," and the proposed Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (PS-ITAAC), which were submitted to the NRC for review on April 1, 2009. SNC provided responses to the RAI letter No. 047 questions in a letter dated March 5, 2010. Based on NRC feedback provided in a phone call on April 1, 2010, SNC is providing a revision to its response to RAI 14.03.12-1, which was provided in the March 5, 2010 letter. This enclosure provides SNC's revised response to this RAI. The text that is revised by this response is annotated with a vertical change bar in the right-hand margin of this enclosure and the associated attachment.

This revised response addresses NRC staff comments by incorporating changes to COLA Part 10, Table 2.6.9-2, for ITAAC 4 regarding intrusion detection and assessment equipment, and 8.b) regarding unattended openings that intersect the protected area boundary or vital area boundary. Additionally, the change to Attachment 1 clarifies the basis for concluding that SRP ITAAC 11(d) is redundant to existing ITAAC that demonstrate that the central and secondary alarm stations are equal and redundant, by being constructed, located, protected, and equipped to the standards for the central alarm station.

eRAI Tracking No. 4141

NRC RAI Number 14.03.12-1:

Vogtle Units 3 & 4, S-COL application revision 2, 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 specific design commitments and ITAAC for the physical security system to be used as Vogtle'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 applicant 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

SNC Revised Response:

By letter dated June 4, 2009, Westinghouse Electric Company (Westinghouse) submitted the inspections, tests, analyses, and acceptance criteria (ITAAC) related to the physical security design commitments within the scope of the AP1000 design certification. The corresponding physical security ITAAC (PS-ITAAC) related to the AP1000 reference combined license application (R-COLA) were provided by Southern Nuclear Operating Company (SNC) in a letter dated March 23, 2009. The AP1000 R-COLA PS-ITAAC were incorporated into COLA Part 10, Proposed License Conditions (including ITAAC), Appendix B, new Table 2.6.9-2, "Site-Specific Physical Security Inspections, Tests, Analyses, and Acceptance Criteria." On December 16, 2009, Westinghouse submitted a revision to the AP1000 design certification security ITAAC, based on a draft to Revision 1 of Standard Review Plan section 14.3.12, Revision 1, "Physical Security Hardware – Inspections, Tests, Analyses, and Acceptance Criteria," which is being revised to address the revised 10 CFR 73.55.

An assessment of the AP1000 security ITAAC and the COLA PS-ITAAC identified several changes that are required to the COLA PS-ITAAC to address the 10 CFR 73.55 criteria that are within the scope of the AP1000 combined license applicants. Using the ITAAC in draft Revision 1 to SRP 14.3.12, dated February 9, 2010, as guidance, the PS-ITAAC in COLA Part 10, Table 2.6.9-2, will be revised to complement the AP1000 security ITAAC, thereby fully addressing the revised 10 CFR 73.55. The revised COLA PS-ITAAC provided below address the new 10 CFR 73.55 requirements, and account for the revised AP1000 design certification security ITAAC that were provided in Westinghouse's December 16, 2009 letter. These revised COLA PS-ITAAC will replace the current PS-ITAAC in COLA Part 10, Table 2.6.9-2 in a future revision of the COLA.

Attachment 1 to this enclosure provides a table comparing the draft SRP 14.3.12 ITAAC to the AP1000 design certification security ITAAC, and the revised COLA PS-ITAAC. The Attachment 1 table was developed as an aid to demonstrate conformance with the guidance provided in the SRP, and is provided in lieu of addressing each of the specific cross-referenced DCD/SRP ITAAC discussed in this RAI. The table content indicates whether the SRP ITAAC is fully addressed by either the DCD security ITAAC or the COLA PS-ITAAC, or partially addressed by both the DCD security ITAAC and the COLA PS-ITAAC.

The December 16, 2009 response to RAI-SRP 14.3.12-NSIR-07 also changed Combined License Information Item 13.6.1 to require Combined License applicants to address site-specific security ITAACs, as applicable. A change to FSAR Section 13.6 will include a reference to FSAR Section 14.3.2.3.2 in response to this COL Information Item.

A future revision of the COLA will reflect the changes discussed in this response.

This response is expected to be applicable to the AP1000 S-COLAs that also receive this question.

Associated VEGP COL Application Revisions:

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.

   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.

3. COLA Part 10, Proposed License Conditions (Including ITAAC), Appendix B, Inspections, Tests, Analysis, 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.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
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.
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.
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.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
4. The intrusion detection and assessment equipment 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 and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.	The intrusion detection and assessment equipment 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. b) detect firearms, explosives, and incendiary devices at the protected area personnel access points.	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. 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.

TABLE 2.6.9-2 – SITE-SPECIFIC PHYSICAL SECURITY INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA		
Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
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.
8.b) Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.	Inspections will be performed of unattended openings that intersect the protected area boundary or vital area boundary.	Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.
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.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

Attachment 1: Cross-Reference of SRP 14.3.12, AP1000 DCD, and COLA Physical Security Inspections, Tests, Analyses, and Acceptance Criteria (17 pages, plus cover sheet)

Southern Nuclear Operating Company

ND-10-0886

Attachment 1 to Enclosure

Cross-Reference of
SRP 14.3.12, AP1000 DCD, and COLA
Physical Security
Inspections, Tests, Analyses, and Acceptance Criteria

NOTE: The enclosed document is seventeen (17) pages in length.

Cross-Reference of SRP 14.3.12, AP1000 DCD, and COLA Physical Security Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC #1: Vital Areas & Vital Area Barriers Requirements		
1 (a). Vital equipment will be located only within a vital area. AP1000 DCD ITAAC #7.a) - fully addresses 7.a) Vital equipment is located only within a vital area.	**1 (a). All vital equipment locations will be inspected.** Inspection will be performed to confirm that vital equipment is located within a vital area.	**1 (a). Vital equipment is located only within a vital area.** Vital equipment is located only within a vital area.
1 (b). Access to vital equipment will require passage through at least two physical barriers. AP1000 DCD ITAAC #7.b) - partially addresses 7.b) Access to vital equipment requires passage through the vital area barrier. COLA PS-ITAAC #7 – partially addresses 7. Access to vital equipment physical barriers requires passage through the protected area perimeter barrier.	**1 (b). All vital equipment physical barriers will be inspected.** Inspection will be performed to confirm that access to vital equipment requires passage through the vital area barrier. Inspection will be performed to confirm that access to vital equipment physical barriers requires passage through the protected area perimeter barrier.	**1 (b). Vital equipment is located within a protected area such that access to the vital equipment requires passage through at least two physical barriers.** Vital equipment is located within a protected area such that access to vital equipment requires passage through the vital area 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.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 2: Protected Area Barrier Requirements		
2 (a). Physical barriers for the protected area perimeter will not be part of vital area barriers. COLA PS-ITAAC #2 – fully addresses 2. Physical barriers for the protected area perimeter are not part of vital area barriers.	**2 (a). The protected area perimeter barriers will be inspected.** An inspection of the protected area perimeter barrier will be performed.	**2 (a). Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.** Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.
2 (b). Penetrations through the protected area barrier will be secured and monitored. COLA PS-ITAAC #8.a) – fully addresses 8.a) Penetrations through the protected area barrier are secured and monitored.	**2 (b). All penetrations through the protected area barrier will be inspected.** Inspections will be performed of penetrations through the protected area barrier.	**2 (b). All penetrations and openings through the protected area barrier are secured and monitored by intrusion detection equipment.** Penetrations and openings through the protected area barrier are secured and monitored.
2 (c). Unattended openings that intersect a security boundary, such as underground pathways, will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.	**2 (c). All unattended openings within the protected area barriers will be inspected.**	**2 (c). All unattended openings (such as underground pathways) that intersect a security boundary (such as the protected area barrier), are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
COLA PS-ITAAC #8.b) – fully addresses 8.b) Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.	Inspections will be performed of unattended openings that intersect the protected area boundary or vital area boundary.	Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.
SRP 14.3.12 PS-ITAAC # 3: Isolation Zones Requirements		
3 (a). Isolation zones will exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and will be designed of sufficient size to permit observation and assessment on either side of the barrier. COLA PS-ITAAC #3.(a) – fully addresses 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.	**3 (a). The isolation zones in outdoor areas adjacent to the protected area perimeter barrier will be inspected.** Inspections will be performed of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area.	**3 (a). The isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and are of sufficient size to permit observation and assessment of the activities on either side of the barrier in the event of its penetration or attempted penetration.** 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.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
3 (b). The isolation zone will be monitored with intrusion detection and assessment equipment that is designed to provide detection and assessment of activities within the isolation zone. COLA PS-ITAAC #3.b) – fully addresses 3.b) The isolation zones are monitored with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.	**3 (b). The intrusion detection equipment within the isolation zones will be inspected.** An inspection will be performed of the intrusion detection equipment within the isolation zones.	**3 (b). Isolation zones are equipped with intrusion detection and assessment equipment capable of providing detection and assessment of activities within the isolation zone.** The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.
3 (c). Areas where permanent buildings do not allow a sufficient observation distance between the intrusion detection system and the protected area barrier (e.g., the building walls are immediately adjacent to, or are an integral part of the protected area barrier) will be monitored with intrusion detection and assessment equipment that is designed to detect the attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of the detected activities.	**3 (c). Inspections of areas of the protected area perimeter barrier that do not have isolation zones will be performed.**	**3 (c). Areas where permanent buildings do not allow a sufficient observation distance between the intrusion detection system and the protected area barrier (e.g., the building walls are immediately adjacent to, or an integral part of the protected area barrier) are monitored with intrusion detection and assessment equipment that detects attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of the detected activities.**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
COLA PS-ITAAC #3.(a) – fully addresses 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.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 4: Protected Area Perimeter Intrusion Detection Systems Requirements		
4 (a). Intrusion detection system will be designed to detect penetration or attempted penetration of the protected area perimeter barrier before and subsequent alarms annunciate completed penetration of the barrier, and for subsequent alarms to annunciate concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations). COLA PS-ITAAC #4.a) – fully addresses 4. The intrusion detection and assessment equipment 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	**4 (a). Tests, inspections or a combination of tests and inspections of the intrusion detection system will be performed.** Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.	**4 (a). The intrusion detection system can detect penetration or attempted penetration of the protected area perimeter barrier before completed penetration of the barrier and subsequent alarms annunciate concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).** The intrusion detection and assessment equipment 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

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
4 (b). The perimeter assessment equipment will be designed to provide video image recording with real-time and play-back capability that can provide assessment of detected activities before and after each alarm annunciation at the protected area perimeter barrier. AP1000 DCD ITAAC #5.a) - fully addresses 5.a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after alarm annunciation within the perimeter area barrier.	**4 (b). Tests, inspections or a combination of tests and inspections of the video assessment equipment will be performed.** Test, inspection, or a combination of test and inspections of the installed systems will be performed.	**4 (b). The perimeter assessment equipment is capable of real-time and play-back video image recording that provides assessment of detected activities before and after each alarm annunciation at the protected area perimeter barrier.** Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time and playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.
4.(c) The intrusion detection and assessment equipment at the protected area perimeter will be designed to remain operable from an uninterruptible power supply in the event of the loss of normal power. COLA PS-ITAAC #4.b) – fully addresses 4. The intrusion detection and assessment equipment at the protected area perimeter: b) remains operable from an uninterruptible power supply in the event of the loss of normal power.	**4 (c). Tests, inspections or a combination of tests and inspections of the uninterruptible power supply will be performed.** Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.	**4 (c) All intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.** The intrusion detection and assessment equipment at the protected area perimeter: b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 5: Illumination Requirements		
5. Isolation zones and exterior areas within the protected area will be provided with illumination to permit assessment in the isolation zones and observation of activities within exterior areas of the protected area. AP1000 DCD PS-ITAAC #8 – fully addresses 8. Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles.	**5. The illumination in isolation zones and exterior areas within the protected area will be inspected.** Inspection of the illumination in the isolation zones and external areas of the protected area will be performed.	**5. Illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or alternatively augmented, sufficient to permit assessment and observation.** The illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 6: Bullet Resisting Barrier Requirements		
6. The external walls, doors, ceiling and floors in the Main Control Room, central alarm station, secondary alarm station and the last access control function for access to the protected area are bullet resistant, to at least Underwriters Laboratory Ballistic Standard 752 "The Standard of Safety for Bullet-Resisting Equipment," level 4 or National Institute of justice Standard 0108-01, "Ballistic Resistant Protective Materials Type III.	**6. Type test, analysis, or a combination of type test and analysis of the external walls, doors, ceiling, and floors in the main control room, central alarm station, secondary alarm station, and the last access control function for access to the protected area will be performed.**	**6. A report exists and concludes that the walls, doors, ceilings, and floors in the main control room, central alarm station, secondary alarm station, and the last access control function for access to the protected area are bullet resistant to at least Underwriters Laboratories Ballistic Standard 752, Level 4, or National Institute of Justice Standard 0108.01, Type III.**
AP1000 DCD ITAAC #1 - partially addresses 1. The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.	See Tier 1 Material, Table 3.3-6, item 14.	See Tier 1 Material, Table 3.3-6, item 14.
COLA PS-ITAAC #1 – partially addresses 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.
SRP 14.3.12 PS-ITAAC # 7: Vehicle Control Measures Requirements		
7. The vehicle barrier system will be designed, installed, and located at the necessary standoff distance to protect against the design-basis threat vehicle bombs.	**7. Type test, inspections, analysis or a combination of type tests, inspections, and analysis will be performed for the vehicle barrier system.**	**7. A report exists and concludes that the vehicle barrier system will protect against the design-basis threat vehicle bombs based on the standoff distance for the system.**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
AP1000 DCD ITAAC #6 - fully addresses 6. The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs.	Inspections and analysis will be performed for the vehicle barrier system.	The vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the system.
SRP 14.3.12 PS-ITAAC #8:		
8 (a). Access control points will be established and designed to control personnel and vehicle access into the protected area. COLA PS-ITAAC #5.a) - fully addresses 5. Access control points are established to: a) Control personnel and vehicle access into the protected area.	**8 (a). Tests, inspections, or a combination of tests and inspections of installed systems and equipment will be performed.** 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.	**8 (a). Access control points exist for the protected area and are configured to control access.** The access control points for the protected area: a) are configured to control personnel and vehicle access.
8 (b). Access control points will be established and designed with equipment for the detection of firearms, explosives, and incendiary devices at the protected area personnel access points. COLA PS-ITAAC #5.b) - fully addresses b) Detect firearms, explosives, and incendiary devices at the protected area personnel access points.	**8 (b). Tests, inspections, or a combination of tests and inspections of installed systems and equipment will be performed.** **(same as 5 (a))**	**8 (b). Detection equipment exists and is capable of detecting firearms, explosives, and incendiary devices at the protected area personnel access control points.** b) include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC #9: Picture Badge Identification System Requirements		
9. An access control system with a numbered photo identification badge system will be installed and designed for use by individuals who are authorized access to protected areas and vital areas without escort. COLA PS-ITAAC #6. - fully addresses 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.	**9. The access control system and the numbered photo identification badge system will be tested.** A test of the access control system with numbered picture badges will be performed.	**9. The access authorization system with a numbered photo identification badge system is installed and provides authorized access to protected and vital areas only to those individuals with unescorted access authorization.** 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.
SRP 14.3.12 PS-ITAAC # 10: Vital Areas Access Control Requirements		
10. Unoccupied vital areas will be designed with locking devices and intrusion detection devices that annunciate in the central and secondary alarm stations. AP1000 DCD ITAAC #4 - fully addresses 4. Vital areas are locked and alarmed with active intrusion detection systems that annunciate in the central and secondary alarm stations upon intrusion into a vital area.	**10. Tests, inspections, or a combination of tests and inspections of unoccupied vital area intrusion detection equipment and locking devices will be performed.** See Tier 1 Material, Table 3.3-6, item 17.	**10. Unoccupied vital areas are locked, and intrusion is detected and annunciated in both the central and secondary alarm stations.** See Tier 1 Material, Table 3.3-6, item 17.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 11: Alarm Station Requirements		
11 (a). Intrusion detection and video assessment equipment will annunciate and be displayed concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations). AP1000 DCD ITAAC #5.a) - fully addresses 5.a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after alarm annunciation within the perimeter area barrier.	**11 (a). Tests, inspections or a combination of tests and inspections of intrusion detection equipment and video assessment equipment will be performed.** Test, inspection, or a combination of test and inspections of the installed systems will be performed.	**11 (a). Intrusion detection equipment and video assessment equipment annunciate and display concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).** Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time and playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.
11 (b). Central and secondary alarm stations will be located inside the protected area and will be designed so that the interiors of both alarm stations are not visible from the perimeter of the protected area. AP1000 DCD ITAAC #5.b) - fully addresses 5.b) The central and secondary alarm stations are located inside the protected area, and the interior of each alarm station is not visible from the perimeter of the protected area.	**11 (b). The central and secondary alarm station locations will be inspected.** Inspections of the central and secondary alarm stations will be performed.	**11 (b). Central and secondary alarm stations are located inside the protected area, and the interiors of both alarm stations are not visible from the perimeter of the protected area.** The central and secondary alarm stations are located inside the protected area and the interior of each alarm station is not visible from the perimeter of the protected area.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
11 (c). Central and secondary alarm stations will be designed, equipped and constructed such that no single act, in accordance with the design basis threat of radiological sabotage, can simultaneously remove the ability of both the central and secondary alarm stations to (1) detect and assess alarms, (2) initiate and coordinate an adequate response to alarms, (3) summon offsite assistance, and (4) provide effective command and control. <u>AP1000 DCD ITAAC #5.c) - fully addresses</u> 5.c) The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel.	**11 (c). Tests, inspections or a combination of tests and inspections of the central and secondary alarm stations will be performed.** Inspections and/or analysis of the central and secondary alarm stations will be performed.	**11 (c). Central and secondary alarm stations are designed, equipped and constructed such that no single act, in accordance with the design basis threat of radiological sabotage, can simultaneously remove the ability of both the central and secondary alarm stations to (1) detect and assess alarms, (2) initiate and coordinate an adequate response to alarms, (3) summon offsite assistance, and (4) provide effective command and control.** The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists.
11 (d). Both the central and secondary alarm stations will be constructed, located, protected, and equipped to the standards for the central alarm station (alarm stations need not be identical in design but shall be equal and redundant, capable of performing all functions required of alarm stations).	**11 (d). Tests, inspections or a combination of tests and inspections of the central and secondary alarm stations will be performed.**	**11 (d). The central and secondary alarm stations are located, constructed, protected, and equipped to the standards of the central alarm station and are functionally redundant. (Stations need not be identical in design.)**
The information contained in SRP ITAAC number 11(d) is redundant to existing ITAAC in the AP1000 Design Certification Document (DCD). AP1000 DCD security ITAAC numbers 1, 4, 5(a), 5(b), 5(c), 13(a), 13(b), 13(c), and 15(b) demonstrate that the central and secondary alarm stations are equal and redundant, by being constructed, located, protected, and equipped to the standards for the central alarm station.		

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 12: Secondary Power Supplies for Alarm Annunciation and Communication Equipment Requirements		
12. Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area. AP1000 DCD ITAAC #3 - fully addresses 3. Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within the vital area.	**12. The secondary security power supply system will be inspected.** See Tier 1 Material, Table 3.3-6, item 16.	**12. The secondary security power system for alarm annunciator equipment and nonportable communications equipment is located within a vital area.** See Tier 1 Material, Table 3.3-6, item 16.
SRP 14.3.12 PS-ITAAC # 13: Intrusion Detection Systems Console Display Requirements		
13(a). Security alarm devices, including transmission lines to annunciators, will be tamper-indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs or when on standby power), and alarm annunciation indicates the type of alarm (e.g., intrusion alarms, emergency exit alarm) and location. AP1000 DCD ITAAC #15.a) - fully addresses 15.a) Security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location.	**13(a). All security alarm devices and transmission lines will be tested.** A test will be performed to verify that security alarms, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.	**13(a). Security alarm devices including transmission lines to annunciators are tamper-indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power), and the alarm annunciation indicates the type of alarm (e.g., intrusion alarm, emergency exit alarm) and location.** A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
13(b). Intrusion detection and assessment systems will be designed to provide visual display and audible annunciation of alarms in both the central and secondary alarm stations. AP1000 DCD ITAAC #15.b) - fully addresses 15.b) Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm stations.	**13(b). Intrusion detection and assessment systems will be tested.** Test will be performed on intrusion detection and assessment equipment.	**13(b). The intrusion detection systems provide a visual display and audible annunciation of all alarms concurrently in at least two continuously manned onsite alarms stations (central and secondary alarm stations).** The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.
SRP 14.3.12 PS-ITAAC # 14: Intrusion Detection Systems Recording Requirements		
14. Intrusion detection systems recording equipment will record onsite security alarm annunciation including the location of the alarm, false alarm, alarm check, and tamper indication and the type of alarm, location, alarm circuit, date, and time. AP1000 DCD ITAAC #16 - fully addresses 16. Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.	**14. The intrusion detection systems recording equipment will be tested.** Test, analysis, or a combination of test and analysis will be performed to ensure that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.	**14. Intrusion detection systems recording equipment is capable of recording each onsite security alarm annunciation including the location of the alarm, false alarm, alarm check, and tamper indication and the type of alarm, location, alarm circuit, date, and time.** A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
SRP 14.3.12 PS-ITAAC # 15: Vital Area Emergency Exits Requirements		
15. Emergency exits through the protected area perimeter and vital area boundaries will be alarmed with intrusion detection devices and secured by locking devices that allow prompt egress during an emergency.	**15. Tests, inspections, or a combination of tests and inspections of emergency exits through the protected area perimeter and vital area boundaries will be performed.**	**15. Emergency exits through the protected area perimeter and vital area boundaries are alarmed with intrusion detection devices and secured by locking devices that allow prompt egress during an emergency.**
AP1000 DCD ITAAC #9 - partially addresses 9. Emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.	Test, inspection, or a combination of tests and inspections of the emergency exits through the vital area boundaries will be performed.	The emergency exists through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.
COLA PS-ITAAC #9 – partially addresses 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.
SRP 14.3.12 PS-ITAAC # 16: Communication Requirements		
16(a). The central and secondary alarm stations will have conventional (land line) telephone service with the control room and local law enforcement authorities.	**16(a). Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' conventional (land line) telephone service will be performed.**	**16(a). The central and secondary alarm stations are equipped with conventional (land line) telephone service with the control room and local law enforcement authorities.**
AP1000 DCD ITAAC #13.a) - fully addresses 13 a). The central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities.	Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' conventional telephone services will be performed.	The central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
16(b). The central and secondary alarm stations will be capable of continuous communication with on-duty security force personnel.	**16 (b). Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' continuous communication capabilities will be performed.**	**16 (b). The central and secondary alarm stations are capable of continuous communication with on-duty watchmen, armed security officers, armed responders, or other security personnel who have responsibilities within the physical protection program and during contingency response events.**
AP1000 DCD ITAAC #13.b) - fully addresses 13.b) The central and secondary alarm stations are capable of continuous communication with security personnel.	Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' continuous communication capabilities will be performed.	The central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event.
16(c) Nonportable communications equipment in the central and secondary alarm stations will remain operable from an independent power source in the event of loss of normal power.	**16(c) Tests, inspections, or a combination of tests and inspections of the non-portable communications equipment will be performed.**	**16(c) All nonportable communication devices (including conventional telephone systems) in the central and secondary alarm stations are wired to an independent power supply that enables those systems to remain operable (without disruption) during the loss of normal power.**
AP1000 DCD ITAAC #13.c) - fully addresses 13.c) Non-portable communication equipment in the central and secondary alarm stations remain operable from an independent power source in the event of loss of normal power.	Tests, inspections or a combination of tests and inspections of the non-portable communications equipment will be performed.	Non-portable communication devices (including conventional telephone systems) in the central and secondary alarm stations are wired to an independent power supply that enables the system to remain operable during the loss of normal power.