

## PMNorthAnna3COLPEmails Resource

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**From:** Jessie, Janelle  
**Sent:** Friday, June 11, 2010 2:58 PM  
**To:** Johnson, Judy  
**Cc:** Patel, Chandu  
**Subject:** FW: Response to RAI Letter 045 Revised Responses to RAI Letters 039 and 043 (COLA Part 8)  
**Attachments:** 061010 D. ltr. Response to RAI Letter 045 Revised Responses to RAI 039 and 043 (COLA Part 8).pdf  
**Importance:** High

Hi Judy,

Here is letter 45 from North Anna. We can discuss it if you have questions or concerns.

Thanks

Janelle  
X6775

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**From:** Wanda K Marshall [mailto:wanda.k.marshall@dom.com]  
**Sent:** Friday, June 11, 2010 1:26 PM  
**Cc:** Patel, Chandu; James T Reece; Jessie, Janelle  
**Subject:** Response to RAI Letter 045 Revised Responses to RAI Letters 039 and 043 (COLA Part 8)  
**Importance:** High

Cc list:

Please see attached.

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*Wanda K. Marshall*  
*North Anna 3 Project Team*  
*Administrative Assistant/Notary Public*  
*DOMINION RESOURCES SERVICES*  
*5000 Dominion Blvd., Glen Allen, VA 23060*

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**Hearing Identifier:** NorthAnna3\_Public\_EX  
**Email Number:** 872

**Mail Envelope Properties** (65FB43187ED87C46B3F00CB97D081E6001149FD18B)

**Subject:** FW: Response to RAI Letter 045 Revised Responses to RAI Letters 039 and 043  
(COLA Part 8)  
**Sent Date:** 6/11/2010 2:58:20 PM  
**Received Date:** 6/11/2010 2:58:22 PM  
**From:** Jessie, Janelle  
**Created By:** Janelle.Jessie@nrc.gov

**Recipients:**  
"Patel, Chandu" <Chandu.Patel@nrc.gov>  
Tracking Status: None  
"Johnson, Judy" <Judy.Johnson@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	1460	6/11/2010 2:58:22 PM
061010 D. ltr. Response to RAI Letter 045 Revised Responses to RAI 039 and 043 (COLA Part 8).pdf		
602610		

**Options**  
**Priority:** High  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

Eugene S. Grecheck  
Vice President  
Nuclear Development

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June 10, 2010

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Serial No. NA3-10-009R  
Docket No. 52-017  
COL/WDC

**DOMINION VIRGINIA POWER**  
**NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER 045**  
**REVISED RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION LETTERS**  
**039 AND 043**  
**(COLA PART 8)**

On April 12, 2010, the NRC requested additional information to support the review of certain portions of the North Anna Unit 3 Combined License Application (COLA). The letter contained seven RAIs, 13.06.01-46 through 13.06.01-52 (Reference RAI Letter 045).

Dominion recently informed NRC that the North Anna 3 COLA would be revised to incorporate the US-APWR technology. As requested by the NRC staff in a conference call on May 12, 2010, these seven RAIs will be addressed in the physical security plan and COLA revision submitted to incorporate the US-APWR technology.

Additionally, on May 12, 2010, Dominion discussed proposed changes to the responses to RAIs 13.06-1 through 13.06-4, 13.06.01-14 and 13.06.01-16 (Reference RAI Letter 039) that were submitted to NRC in a letter dated August 17, 2009 (Serial No. NA3-09-027R). These six RAIs requested information on the training and qualifications for the Armed Security Officer and Armed Responder positions. During the call, Dominion clarified the use, training and qualification of the two positions. The results of the discussion are reflected in the revised responses provided in Enclosures 1 through 6.

Separately, in a conference call with the NRC staff on June 1, 2010, Dominion discussed proposed changes to the responses to NRC Editorial Comments and RAI 13.06.01-42a (Reference RAI Letter 043). These responses were submitted to NRC in letters dated August 17, 2009 (Serial No. NA3-09-027R) and November 19, 2009 (Serial No. NA3-09-035R), respectively. Based on the discussion, Dominion revised the response to RAI 13.06.01-42a, which requested clarification on the RTL qualification for positions listed in the command and control structure. Dominion also revised the response to the Editorial Comments to provide the applicable revision number for

Regulatory Guide 5.66 rather than delete the reference to the revision number as stated in the RAI response letter. The revised responses to RAI 13.06.01-42a and the Editorial Comments are provided in Enclosures 7 and 8, respectively.

As discussed in the June 1, 2010 conference call, it was agreed that Dominion would provide the revised responses to the enclosed RAIs by June 15, 2010. The information provided in the RAI responses will be incorporated into a future submission of the North Anna 3 COLA, as described in the Enclosures.

Please contact Regina Borsh at (804) 273-2247 (regina.borsh@dom.com) if you have questions.

Very truly yours,



Eugene S. Grecheck

COMMONWEALTH OF VIRGINIA

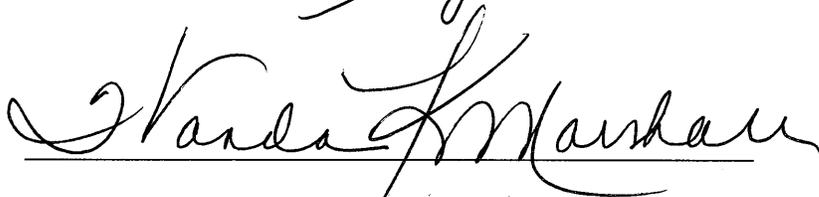
COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President-Nuclear Development of Virginia Electric and Power Company (Dominion Virginia Power). He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

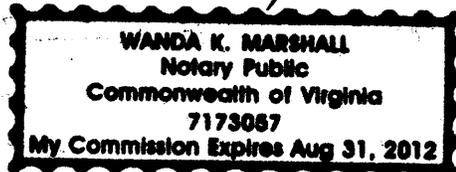
Acknowledged before me this 10<sup>th</sup> day of June, 2010

My registration number is 7173057 and my

Commission expires: August 31, 2012



Notary Public



Enclosures:

1. Revised Response to RAI Letter No 039, RAI 13.06-1
2. Revised Response to RAI Letter No 039, RAI 13.06-2
3. Revised Response to RAI Letter No 039, RAI 13.06-3
4. Revised Response to RAI Letter No 039, RAI 13.06-4
5. Revised Response to RAI Letter No 039, RAI 13.06.01-14
6. Revised Response to RAI Letter No 039, RAI 13.06.01-16
7. Revised Response to RAI Letter No 043, RAI 13.06.01-42a
8. Revised Response to RAI Letter No 039, Editorial Comments

Commitments made in this letter:

1. The information provided in the RAI responses will be incorporated into a future submission of the North Anna 3 COLA, as described in the Enclosures.

cc: U. S. Nuclear Regulatory Commission, Region II  
C. P. Patel, NRC  
J. T. Reece, NRC  
J. B. Jessie, NRC

**ENCLOSURE 1**

**Revised Response to NRC RAI Letter 039**

**RAI Question 13.06-1**

**NRC RAI 13.06-1**

*Appendix C, Safeguards Contingency Plan, Page C-18, Section 4.1.1, 4th paragraph: Please clarify this description. This description is **not** consistent with the North Anna PSP regarding commitments and training of “armed security officers”.*

*Regulatory Basis: 10 CFR 73.55(k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.*

**Dominion Response**

The description of the duties of Armed Security Officers in Section 4.1.1 is correct and refers to Armed Security Officers who are armed responder qualified. The training identified in Appendix B, Security Training and Qualification Plan, addresses training for the position of Armed Security Officers who are not armed responder qualified and the position of Armed Responders. The two positions are separate and not interchangeable. Only Armed Security Officers who are armed responder qualified respond to contingency events.

**Proposed COLA Revision**

None.

**ENCLOSURE 2**

**Revised Response to NRC RAI Letter 039**

**RAI Question 13.06-2**

**NRC RAI 13.06-2**

*Appendix, C, Safeguards Contingency Plan, Page C-20, Section 4.5, 3rd paragraph: This description is **not** consistent with the North Anna PSP regarding commitments and training of “armed security officers.”*

*Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.*

**Dominion Response**

The description of the duties of Armed Security Officers in Section 4.5 is correct and refers to Armed Security Officers who are armed responder qualified. The training identified in Appendix B, Security Training and Qualification Plan, addresses training for the position of Armed Security Officers who are not armed responder qualified and the position of Armed Responders. The two positions are separate and not interchangeable. Only Armed Security Officers who are armed responder qualified respond to contingency events.

**Proposed COLA Revision**

None.

**ENCLOSURE 3**

**Revised Response to NRC RAI Letter 039**

**RAI Question 13.06-3**

**NRC RAI 13.06-3**

*Appendix C, Safeguards Contingency Plan, Page C-20, Section 5.2, 1st paragraph: Please clarify this description. This description is **not** consistent with the North Anna PSP regarding commitments and training of “armed security officers”.*

*Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.*

**Dominion Response**

The description of the duties of Armed Security Officers in Section 5.2 is correct and refers to Armed Security Officers who are armed responder qualified. The training identified in Appendix B, Security Training and Qualification Plan, addresses training for the position of Armed Security Officers who are not armed responder qualified and the position of Armed Responders. The two positions are separate and not interchangeable. Only Armed Security Officers who are armed responder qualified respond to contingency events.

**Proposed COLA Revision**

None.

**ENCLOSURE 4**

**Revised Response to NRC RAI Letter 039**

**RAI Question 13.06-4**

**NRC RAI 13.06-4**

*Appendix, C, Safeguards Contingency Plan, Page C-21, Section 5.2, 2nd paragraph: Please confirm this commitment. This description is **not** consistent with the North Anna PSP regarding commitments and training of “armed security officers”.*

*Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.*

**Dominion Response**

The description regarding the Armed Response Team in the second paragraph of Section 5.2 is correct and refers to Armed Responders and Armed Security Officers who are armed responder qualified. The training identified in Appendix B, Security Training and Qualification Plan, addresses training for the position of Armed Security Officers who are not armed responder qualified and the position of Armed Responders. The two positions are separate and not interchangeable. Only Armed Security Officers who are armed responder qualified respond to contingency events.

**Proposed COLA Revision**

None.

**ENCLOSURE 5**

**Revised Response to NRC RAI Letter 039**

**RAI Question 13.06.01-14**

**NRC RAI 13.06.01-14**

*Physical Security Plan, Page 35, Section 18, 3rd paragraph: Please describe the types of armed personnel that will comprise the armed response force capabilities at North Anna Unit 3. Does North Anna Unit #3 plan to utilize “armed security officers” to augment the armed responders? If yes, the number of armed security officers identified in this paragraph must be available “onsite and at all times”? If no, please delete reference to armed security officers as they are not a committed element of the protective strategy. Also, please confirm that the designated number of armed responders inside the PA, at all times, will not be assigned any other duties that would interfere with their capability to respond in accordance with the protective strategy and necessary timelines. Lastly, please ensure that all personnel committed to armed response in accordance with the protective strategy are appropriately captured within the Critical Task matrix described in Appendix B to this PSP.*

*Regulatory Basis: 10 CFR 73.55(k)(1) The licensee shall establish and maintain, at all times, properly trained, qualified and equipped personnel required to interdict and neutralize threats up to and including the design basis threat of radiological sabotage as defined in § 73.1, to prevent significant core damage and spent fuel sabotage.*

*10 CFR 73.55 (k)(5)(iii) Armed responders shall be available at all times inside the protected area and may not be assigned other duties or responsibilities that could interfere with their assigned response duties.*

*10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.*

**Dominion Response**

The armed response force for North Anna 3 is comprised of officers designated and trained and qualified as Armed Responders and officers designated as Armed Security Officers who are also qualified as armed responders. The Armed Responders are available at all times inside the protected area and may not be assigned other duties or responsibilities that could interfere with their assigned response duties.

In addition, Armed Security Officers who are armed responder qualified are onsite and available at all times. Section 18, Response Requirements, will be revised to match the language in the NEI 03-12 template. The template addresses the types and numbers of armed personnel that comprise the armed response force. The template also addresses the phrases, “onsite and available at all times,” for Armed Security Officers who are armed responder qualified, and

“shall not be assigned any duties that would interfere with their ability to respond and effectively implement the protective strategy,” for Armed Responders.

The training identified in Appendix B, Security Training and Qualification Plan, addresses training for the position of Armed Security Officers who are not armed responder qualified and the position of Armed Responders. The two positions are separate and not interchangeable. Only Armed Security Officers who are armed responder qualified respond to contingency events.

**Proposed COLA Revision**

COLA Part 8 will be revised as described in the response.

**ENCLOSURE 6**

**Revised Response to NRC RAI Letter 039**

**RAI Question 13.06.01-16**

**NRC RAI 13.06.01-16**

*Appendix C, Safeguards Contingency Plan, Page C-25, Section 8, 3rd paragraph, 4th sentence. Please confirm that “only” armed responders are available to implement protective strategy and ensure consistency with other statements made in the North Anna Unit #3 security plans regarding the availability of “armed security officers” to augment armed responders inside the PA.*

*Regulatory Basis: 10 CFR 73.55 (k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties.*

**Dominion Response**

Armed Security Officers who are armed responder qualified, as well as Armed Responders, are available to implement the protective strategy. The fourth sentence of the third paragraph of Section 8 will be revised to add Armed Security Officers who are armed responder qualified as part of the defense-in-depth strategies, as appropriate for all sites.

The training identified in Appendix B, Security Training and Qualification Plan, addresses training for the position of Armed Security Officers who are not armed responder qualified and the position of Armed Responders. The two positions are separate and not interchangeable. Only Armed Security Officers who are armed responder qualified respond to contingency events.

**Proposed COLA Revision**

COLA Part 8 will be revised as described in the response.

**ENCLOSURE 7**

**Revised Response to NRC RAI Letter 043**

**RAI Question 13.06.01-42a**

**NRC RAI 13.06.01-42**

*Appendix C, Safeguards Contingency Plan, Section 4.1.2, Page C-18. Clarify the command-and-control succession/structure described and revise the Critical Task Matrix in Appendix B to the PSP for consistency with the described command and control succession/structure.*

- a. *As identified in parenthesis "(RTL qualified)," in the absence of the RTL, will all individuals performing the positions listed be RTL qualified, or will individuals within the listed positions be specified? If only specified individuals, how will these individuals be identified and trained? The Critical task Matrix in Appendix B, does not reflect RTL training for the listed positions.*
- b. *The last two (2) listed positions do not have the caveat "RTL Qualified" in parenthesis following the position title, however, the Critical task Matrix in Appendix B, identifies RTL training for these positions. Clarify if these individuals will be RTL qualified and how these individuals will be able to perform RTL duties in conjunction with their primary duties.*
- c. *The position of Security Shift Supervisor (SSS) is identified in Section 4.1 (page 5) of the PSP and in the Critical Task Matrix in Appendix B. The North Anna command-and-control succession/structure does not include the SSS. If the SSS position is not applicable to North Anna Unit #3, clarify the site-specific applicability of this position in the PSP.*

*Regulatory Basis: 10 CFR 73, Appendix C, Section II, paragraph A.(4). Licensee safeguards contingency planning should result in organizing the licensee's resources in such a way that the participants will be identified, their responsibilities specified, and the responses coordinated. The responses should be timely, and include personnel who are trained and qualified to respond in accordance with a documented training and qualification program.*

**Dominion Response**

- a. Only specified individuals are trained/qualified in RTL duties. This information is tracked through training/qualification records. The RTL training is not reflected in the Critical Task Matrix because not all individuals in the listed position are trained in this task.

**Proposed COLA Revision**

None.

**ENCLOSURE 8**

**Revised Response to NRC RAI Letter 039**

**RAI Question Editorial Comments**

**NRC Comment:**

1. *Physical Security Plan, Page 18, Section 14.1, 2nd paragraph. Please update this section to reference RG 5.66, Rev 1 or delete reference to Rev #.*

**Dominion Response:**

The section will be updated to reference RG 5.66, Rev. 1.

**NRC Comment:**

2. *Physical Security Plan, Page 24, Section 14.4.6, 3rd paragraph, 2nd sentence. Please update reference to RG 5.66, Rev 1 or delete reference to Rev #.*

**Dominion Response:**

The section will be updated to reference RG 5.66, Rev. 1.

**NRC Comment:**

3. *Physical Security Plan, Page 43, Section 22.1. Please update this section to reference RG 5.66, Rev 1 or delete reference to Rev #.*

**Dominion Response:**

The section will be updated to reference RG 5.66, Rev. 1.