



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

August 4, 2010  
U7-C-STP-NRC-100188

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
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South Texas Project  
Units 3 and 4  
Docket Nos. 52-012 and 52-013  
Revised COLA Part 8 Milestone Schedule and COLA Part 9 ITAAC

Reference: Letter, Scott Head to Document Control Desk, "Submittal of Proposed Revisions to STP COLA Part 2, 8, and 9" dated March 24, 2009, U7-C-STP-NRC-090024 (ML090910083)

This letter provides proposed revisions to STP COLA Parts 8 and 9 provided in the attachments to the referenced letter. The changes are proposed as a result of revisions to NUREG 0800, Standard Review Plan, Section 14.3.12 'Physical Security Hardware- Inspections, Tests, Analyses, and Acceptance Criteria' and agreement between NRC and STP to rescind the Security Milestone Schedule included as Part 8.2 of the STP COLA. This change will be implemented in the next revision of the COLA.

The attachment to this letter proposes to replace COLA Part 9.5 'Physical Security ITAAC' in its entirety at the next revision of the COLA.

Additionally, COLA Part 8.2 'Security Program Milestone and Implementation Schedule' will be removed in its entirety from the STP COLA in the next revision.

There are no commitments in this letter.

If you have any questions regarding this response, please Scott Head at (361) 972-7136, or Bill Mookhoek at (361) 972-7274.

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HRO

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/4/10



Mark McBurnett  
Vice President, Oversight and Regulatory Affairs  
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fjp

Attachment:

Revised COLA Part 9.5 'Physical Security ITAAC'

cc: w/o attachment except\*  
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## **5.0 Physical Security ITAAC**

This set of ITAAC is tailored to the ABWR reactor design and Security Program requirements for STP 3 & 4. Table 5.0-1 addresses security requirements associated with the generic PS-ITAAC contained in NUREG 0800, Standard Review Plan, Section, 14.3.12, "Physical Security Hardware-Inspections, Tests, Analyses, and Acceptance Criteria (PS-ITAAC)." Table 5.0-1 provides the Security ITAAC proposed for STP 3 & 4.

**Table 5.0-1 Physical Security— Inspection, Test, Analysis, and Acceptance Criteria (PS-ITAAC)****PS-ITAAC #1 Vital Areas & Vital Area Barriers Requirements:**

10 CFR 73.55 (e)(9)(i) Vital equipment must be located only within vital areas, which must be located within a protected area so that access to vital equipment requires passage through at least two physical barriers, except as otherwise approved by the Commission and identified in the security plans.

10 CFR 73.55 (e)(9)(iv) More than one vital area may be located within a single protected area.

10 CFR 73.55(e)(9)(v)(D) At a minimum, the following shall be considered vital areas:

(A) The reactor control room; (B) The spent fuel pool; (C) The central alarm station; (D) The secondary alarm station in accordance with § 73.55(i)(4)(iii)

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
1 (a) Vital equipment is located only within a vital area.	1 (a) Inspections will be performed of all vital equipment Locations.	1 (a) All vital equipment is located only within a vital area,
1 (b) Access to vital equipment requires passage through at least two physical barriers.	1 (b) Inspections will be performed of all vital equipment physical barriers.	1 (b) All vital equipment is located within a protected area such that access to the as-built vital equipment requires passage through at least two physical barriers.

**PS-ITAAC #2 Protected Area Barrier Requirements:**

10 CFR 73.55(e)(3)(i) Physical Barriers must be designed and constructed to: (A) Protect against the design basis threat of radiological sabotage; (B) Account for site-specific conditions; and (C) Perform their required function in support of the licensee physical protection program.

10 CFR 73.55(e)(3)(ii) Provide deterrence, delay, or support access control.

10 CFR 73.55(e)(8)(i) The protected area perimeter must be protected by physical barriers that are designed and constructed to: (A) Limit access into the protected area to only those personnel, vehicles, and materials required to perform official duties; (B) Channel personnel, vehicles, and materials to designated access control portals; and (C) Be separated from any other barrier designated as a vital area physical barrier, unless otherwise identified in the Physical Security Plan.

10 CFR 73.55(e)(8)(ii) Penetrations through the protected area barrier must be secured and monitored in a manner that prevents or delays, and detects the exploitation of any penetration.

10 CFR 73.55(i)(5)(iii) Unattended openings that intersect a security boundary such as underground pathways must be protected by a physical barrier and monitored by intrusion detection equipment or observed by security personnel at a frequency sufficient to detect exploitation.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
2 (a) Physical barriers for the protected area perimeter are not part of vital area barriers	2 (a) Inspections of the protected area perimeter barriers 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.
2 (b) Penetrations through the protected area barrier must be secured and monitored in a manner that prevents or delays, and detects the exploitation of any penetration.	2 (b) Inspections will be performed of all 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 to prevent, delay and detect exploitation of the penetration or opening.
2 (c) Unattended openings that intersect a security boundary such as underground pathways must be protected by a physical barrier and monitored by intrusion detection equipment or observed at a frequency sufficient to detect exploitation.	2 (c) Inspections will be performed of all unattended openings within the protected area barriers.	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 observed at a frequency sufficient to detect exploitation.

**PS-ITAAC #3 Isolation Zones Requirements:**

10 CFR 73.55(e)(7)(i) An isolation zone must be maintained in outdoor areas adjacent to the protected area perimeter barrier. The isolation zone shall be: (A) Designed and of sufficient size to permit observation and assessment of activities on either side of the protected area barrier; (B) Monitored with intrusion detection equipment designed to satisfy the requirements of § 73.55(i) and be capable of detecting both attempted and actual penetration of the protected area perimeter barrier before completed penetration of the protected area perimeter barrier; and (C) Monitored with assessment equipment designed to satisfy the requirements of § 73.55(i) and provide real-time and play-back/recorded video images of the detected activities before and after each alarm annunciation.

10 CFR 73.55(e)(8)(iv) Where building walls or roofs comprise a portion of the protected area perimeter barrier, an isolation zone is not necessary provided that the detection and, assessment requirements of this section are met, appropriate barriers are installed, and the area is described in the security plans.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
3 (a) Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allows sufficient size for observation and assessment on either side of the barrier.	3 (a) Inspections of the isolation zones outdoor areas adjacent to the physical barrier will be performed.	3 (a) The isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow sufficient size for observation and assessment of the activities of people on either side of the barrier in the event of its penetration or attempted penetration.
3 (b) The isolation zone shall be monitored with intrusion detection equipment and provide, at all times, the capability to detect and assess unauthorized persons.	3 (b) An inspection of the intrusion detection equipment within the isolation zones will be performed.	3 (b) The isolation zones are equipped with intrusion detection and assessment equipment and provide, at all times, the capability to detect and assess unauthorized persons.
3 (c) Where permanent buildings do not allow a sufficient size 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 (c) Inspections of the isolation zones will be performed.	3 (c) Where permanent buildings do not allow a sufficient size 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 sufficient size observation distance does not apply.

**PS-ITAAC #4 Protected Area Perimeter Intrusion Detection Systems Requirements:**

10 CFR 73.55(e)(7)(i) An isolation zone must be maintained in outdoor areas adjacent to the protected area perimeter barrier. The isolation zone shall be: (A) Designed and of sufficient size to permit observation and assessment of activities on either side of the protected area barrier; (B) Monitored with intrusion detection equipment designed to satisfy the requirements of § 73.55(i) and be capable of detecting both attempted and actual penetration of the protected area perimeter barrier before completed penetration of the protected area perimeter barrier; and (C) Monitored with assessment equipment designed to satisfy the requirements of § 73.55(i) and provide real-time and play-back/recorded video images of the detected activities before and after each alarm annunciation.

10 CFR 73.55(i)(1) The licensee shall establish and maintain intrusion detection and assessment systems that satisfy the design requirements of § 73.55(b) and provide, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the licensee's protective strategy.

73.55(i)(2) Intrusion detection equipment must annunciate and video assessment equipment shall display concurrently, in at least two continuously staffed onsite alarm stations.

10 CFR 73.55(i)(3)(vii) Ensure 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.

10 CFR 73.55(e)(3)(i) Be designed and constructed to: (A) Protect against the design basis threat of radiological sabotage; (B) Account for site-specific conditions; and (C) Perform their required function in support of the licensee physical protection program.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
4 (a) Intrusion detection system (IDS) can detect penetration or attempted penetration of the protected area perimeter barrier and subsequent alarms annunciate concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).	4 (a) Tests, inspections or a combination of tests and inspections of the intrusion detection system will be performed.	4 (a) The intrusion detection system can detect penetration or attempted penetration of the protected area perimeter barrier and subsequent alarms annunciate concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).
4 (b) Video image recording with real-time and play-back capability can provide assessment, activities	4 (b) Tests, inspections or a combination of tests and inspections of the video assessment equipment will be performed.	4 (b) The video image recording with real-time and play-back capability can provide assessment of, activities before and after each alarm annunciation within the isolation zone and



<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
before and after each alarm annunciation within the isolation zone and subsequent alarms annunciate and display concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).		subsequent alarms annunciate and display concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).
4. (c) 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.	4 (c) Tests, inspections or a combination of tests and inspections of the 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.

**PS-ITAAC #5 Illumination Requirements:**

10 CFR 73.55(i)(6)(ii) The licensee shall provide a minimum illumination level of 0.2 foot-candles, measured horizontally at ground level, in the isolation zones and appropriate exterior areas within the protected area.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
5. 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. Inspections of the Illumination in isolation zones and exterior areas of the protected 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, sufficient to permit observation.

**PS-ITAAC #6 Bullet Resisting Barriers Requirements:**

10 CFR 73.55(e)(5) Bullet Resisting Physical Barriers. The reactor control room, the central alarm station, and the location within which the last access control function for access to the protected area is performed, must be bullet-resisting.

10 CFR 73.55 (i)(4)(iii) Applicants for an operating license under the provisions of part 50, or holders of a combined license under the provisions of part 52, shall construct, locate, protect, and equip both the central and secondary alarm stations to the standards for the central alarm station contained in this section. Both alarm stations shall be equal and redundant, such that all functions needed to satisfy the requirements of this section can be performed in both alarm stations.

Note: 10 CFR 73.55 (a)(6) Applicants for an operating license under the provisions of part 50, or holders of a combined license under the provisions of part 52, that do not reference a standard design certification or reference a standard design certification issued after May 26, 2009 shall meet the requirement of § 73.55(i)(4)(iii).

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
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 the weapons of the DBT.	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, 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 the weapons of the DBT.

**PS-ITAC #7 Vehicle Control Measures Requirements:**

10 CFR 73.55(e)(10) Vehicle control measures. Consistent with the physical protection program design requirements of § 73.55(b), and in accordance with the site-specific analysis, the licensee shall establish and maintain vehicle control measures, as necessary, to protect against the design basis threat of radiological sabotage vehicle bomb assault.

10 CFR 73.55(e)(10)(i) Land vehicles. Licensees shall: (A) Design, construct, install, and maintain a vehicle barrier system, to include passive and active barriers, at a stand-off distance adequate to protect personnel, equipment, and systems necessary to prevent significant core damage and spent fuel sabotage against the effects of the design basis threat of radiological sabotage land vehicle bomb assault. (B) Periodically check the operation of active vehicle barriers and provide a secondary power source, or a means of mechanical or manual operation in the event of a power failure, to ensure that the active barrier can be placed in the denial position to prevent unauthorized vehicle access beyond the required standoff distance. (C) Provide periodic surveillance and observation of vehicle barriers and barrier systems adequate to detect indications of tampering and degradation or to otherwise ensure that each vehicle barrier and barrier system is able to satisfy the intended function. (D) Where a site has rail access to the protected area, install a train derailer, remove a section of track, or restrict access to railroad sidings and provide periodic surveillance of these measures.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
7. The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT 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 DBT vehicle bombs based upon the stand-off distance for the system.

**PS-ITAAC #8 Personnel, Vehicle, and Material Access Control Portals and Search Equipment Requirements:**

10 CFR 73.55(h)(2) Owner controlled area searches. (iv) Vehicle searches must be accomplished through the use of equipment capable of detecting firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage, or through visual and physical searches, or both, to ensure that all items are identified before granting access. (v) Vehicle access control points must be equipped with video surveillance equipment that is monitored by an individual capable of initiating a response.

10 CFR 73.55(h)(3)(i) Protected area searches. Licensees shall search all personnel, vehicles and materials requesting access to protected areas. (i) The search for firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage shall be accomplished through the use of equipment capable of detecting these items, or through visual and physical searches, or both, to ensure that all items are clearly identified before granting access to protected areas.

10 CFR 73.55(g)(1)(i)(A) and (B) *Access controls*. (1) Consistent with the function of each barrier or barrier system, the licensee shall control personnel, vehicle, and material access, as applicable, at each access control point in accordance with the physical protection program design requirements of § 73.55(b). (i) To accomplish this, the licensee shall: (A) Locate access control portals outside of, or concurrent with, the physical barrier system through which it controls access. (B) Equip access control portals with locking devices, intrusion detection equipment, and surveillance equipment consistent with the intended function.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
8 (a) Access control points are established to control personnel and vehicle access into the protected area.	8 (a) Tests, inspections, or combination of tests and inspections of installed systems and equipment will be performed.	8 (a) Access control points exists for the protected area are configured to control access.
8 (b) Access control points are established to detect firearms, explosives, and incendiary devices at the protected area personnel access points.	8 (b) Tests, inspections, or combination of tests and inspections of installed systems and equipment will be performed.	8 (b) The detection equipment at the access control points is capable of detecting firearms, explosives, and incendiary devices at the protected area personnel access points.

**PS-ITAAC #9 Picture Badge Identification System Requirements:**

10 CFR 73.55(g)(6)(ii) The licensee shall implement a numbered photo identification badge system for all individuals authorized unescorted access to the protected area and vital areas.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
9. An access control system with a numbered photo identification badge system is installed and designed for use by individuals who are authorized access to protected areas without escort.	9. Tests of the access control system and the numbered badge system 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.

**PS-ITAAC #10 Vital Areas Access Control Requirements:**

10 CFR 73.55(e)(9)(iii) Unoccupied vital areas must be locked and alarmed.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
10. Unoccupied vital areas are locked and alarmed with activated intrusion detection systems that annunciate in the Central and Secondary Alarm Stations.	10. Tests, inspections, or a combination of tests and inspections of unoccupied vital areas intrusion detection equipment and locking devices will be performed.	10. Unoccupied vital areas are locked and intrusion is detected and annunciated in both the Central and Secondary Alarm Station.

**PS-ITAAC #11 Alarm Station Requirements:**

73.55(i)(2) Intrusion detection equipment must annunciate and video assessment equipment shall display concurrently, in at least two continuously staffed onsite alarm stations.

73.55(i)(4)(i) Both alarm stations required by paragraph (i)(2) of this section must be designed and equipped to ensure that a single act, in accordance with the design basis threat of radiological sabotage defined in § 73.1(a)(1), cannot disable both alarm stations. The licensee shall ensure the survivability of at least one alarm station to maintain the ability to perform the following functions: (A) Detect and assess alarms; (B) Initiate and coordinate an adequate response to an alarm; (C) Summon offsite assistance; and (D) Provide command and control.

73.55(i)(4)(ii) Licensees shall:

(A) Locate the central alarm station inside a protected area. The interior of the central alarm station must not be visible from the perimeter of the protected area.

(F) Ensure that an alarm station operator cannot change the status of a detection point or deactivate a locking or access control device at a protected or vital area portal, without the knowledge and concurrence of the alarm station operator in the other alarm station

10.CFR 73.55(i)(4)(iii) Applicants for an operating license under the provisions of part 50, or holders of a combined license under the provisions of part 52, shall construct, locate, protect, and equip both the central and secondary alarm stations to the standards for the central alarm station contained in this section. Both alarm stations shall be equal and redundant, such that all functions needed to satisfy the requirements of this section can be performed in both alarm stations.

Design Commitment	Inspections, Tests, Analysis	Acceptance Criteria
11 (a) Security alarm annunciation and video assessment equipment shall be displayed concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).	11 (a) Tests, inspections or a combination of tests and inspections of alarm annunciation and video assessment equipment will be performed.	11 (a) Security alarm annunciation and video assessment equipment display concurrently in at least two continuously manned onsite alarms stations, (central and secondary alarm stations).
11 (b) Central and secondary alarm stations are located inside the protected area and the interior of both alarm stations are not visible from the perimeter of the protected area.	11 (b) Inspections of the Central and secondary alarm stations locations will be performed.	11 (b) Central and secondary alarm stations are located inside the protected area and the interior of both alarm stations are not visible from the perimeter of the protected area.



<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
11 (c) Central and secondary alarm stations are designed and equipped to ensure that a single act, in accordance with the design basis threat of radiological sabotage ensure the survivability of either alarm station to maintain the ability to perform: (1) detection and assessment of alarms, (2) initiation and coordination of an adequate response to alarms, (3) summoning offsite assistance, and (4) providing effective command and control.	11 (c) Tests, inspections or a combination of tests and inspections of the Central and secondary alarm stations will be performed.	11 (c) Central and secondary alarm stations are designed and equipped to ensure that a single act, in accordance with the design basis threat of radiological sabotage ensures the survivability of either alarm station to maintain the ability to perform: (1) detection and assessment of alarms, (2) initiation and coordination of an adequate response to alarms, (3) summoning offsite assistance, and (4) providing effective command and control.
11 (d) Shall construct, locate, protect, and equip both the central and secondary alarm stations to the standards for the central alarm station.	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 alarm station and secondary alarm station are equal and redundant (locate, protect, and equip to the standards for the central alarm station.

**PS-ITAAC #12 Secondary Power Supplies for Alarm Annunciation and Communication Equipment Requirements:**

10 CFR 73.55(e)(9)(vii) At a minimum, the following shall be located within a vital area: (A) The secondary power supply systems for alarm annunciation equipment; and (B) The secondary power supply systems for non-portable communications equipment.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
12. Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area.	12. Inspections of the secondary security power supply system will be performed.	12. The secondary security power system for alarm annunciator equipment and non-portable communications equipment is located within a vital area.

**PS-ITAAC #13 Intrusion Detection Systems Console Display Requirements:**

73.55(i)(3)(i)(vi) The licensee's intrusion detection and assessment systems must be designed to:

73.55(i)(3)(i) Provide visual and audible annunciation of the alarm.

73.55(i)(3)(ii) Provide a visual display from which assessment of the detected activity can be made.

73.55(i)(3)(iii) Ensure that annunciation of an alarm indicates the type and location of the alarm.

73.55(i)(3)(iv) Ensure that alarm devices to include transmission lines to annunciators are tamper indicating and self-checking.

73.55(i)(3)(v) Provide an automatic indication when the alarm system or a component of the alarm system fails, or when the system is operating on the backup power supply.

(vi) Support the initiation of a timely response in accordance with the security plans, licensee protective strategy, and associated implementing procedures.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
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 on standby power), and alarm annunciation indicates the type of alarm, (e.g., intrusion alarms, emergency exit alarm, etc.) and location.	13 (a) Tests will be performed on all Security alarm devices and transmission lines.	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 that alarm annunciation indicates the type of alarm, (e.g., intrusion alarms, emergency exit alarm, etc.) and location.
13 (b) Intrusion detection and assessment systems must be designed to provide visual display and audible annunciation of the	13 (b) Tests will be performed on Intrusion detection and assessment systems.	13 (b) The intrusion detection systems provides a visual display and audible annunciation of all alarms in both the central and secondary alarm stations.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
alarm in both the central and secondary alarm stations.		

**PS-ITAAC #14 Intrusion Detection Systems Recording Requirements:**

73.55(i)(4)(ii)(h) Maintain a record of all alarm annunciations, the cause of each alarm, and the disposition of each alarm.

10 CFR 73.70(f) A record at each onsite alarm annunciation, location of each alarm, false alarm, alarm check, and tamper indication that identifies the type of alarm, location, alarm circuit, date, and time. In addition, details of response by facility guards and watchmen to each alarm, intrusion, or other security incident shall be recorded. The license shall retain each record for three years after the record is made.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
14. Intrusion Detection Systems Recording 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, time and the disposition of each alarm is recorded.	14. Tests will be performed on the Intrusion Detection Systems Recording equipment.	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, time and the disposition of each alarm is recorded.

**PS-ITAAC #15 Vital Area Emergency Exits Requirements:**

10 CFR.73.55(e)(8)(iii) All emergency exits in the protected area must be alarmed and secured by locking devices that allow prompt egress during an emergency and satisfy the requirements of this section for access control into the protected area.

10 CFR 73.55(e)(9)(ii) The licensee shall protect all vital area access portals and vital area emergency exits with intrusion detection equipment and locking devices that allow rapid egress during an emergency and satisfy the vital area entry control requirements of this section

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
15. Emergency exits through the protected area perimeter and vital area boundaries are alarmed 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 and secured by locking devices that allow prompt egress during an emergency.

**PS-ITAAC #16 Communication Requirements:**

10 CFR 73.55(j)(3) All on-duty security force personnel shall be capable of maintaining continuous communication with an individual in each alarm station, and vehicle escorts shall maintain continuous communication with security personnel. All personnel escorts shall maintain timely communication with the security personnel.

10 CFR 73.55(j)(4) The following continuous communication capabilities must terminate in both alarm stations required by this section: (i) Radio or microwave transmitted two-way voice communication, either directly or through an intermediary, in addition to conventional telephone service between local law enforcement authorities and the site. (ii) A system for communication with the control room

10 CFR 73.55(j)(5) Non-portable communications equipment must remain operable from independent power sources in the event of the loss of normal power.

(1) Each security officer, watchman or armed response individual on duty shall be capable of maintaining continuous communication with an individual in each continuously manned alarm station required by paragraph (e)(1) of this section, who shall be capable of calling for assistance from other security officers, watchmen, and armed response personnel and from local law enforcement authorities. (2) The alarm stations required by paragraph (e)(1) of this section shall have conventional telephone service for communication with the law enforcement authorities as described in paragraph (f)(1) of this section.

<b>Design Commitment</b>	<b>Inspections, Tests, Analysis</b>	<b>Acceptance Criteria</b>
16 (a) The central and secondary alarm stations 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..
16 (b) The central and secondary alarm stations are capable of continuous communication with security 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 security officers, watchmen or armed response individuals, or other security personnel that have responsibilities during a contingency event.
16 (c) Non-portable communications equipment in the central and secondary alarm stations must remain operable from a independent power sources in the event of the 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 non-portable 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.