PMSTPCOL PEmails

From: Foster, Rocky
Sent: Wednesday, August 25, 2010 3:19 PM
To: fjpuleo@stpegs.com
Cc: STPCOL
Subject: Draft RAIs 4950
Attachments: draft RAI 4950.docx

Fred,

Attached are the draft RAIs for Chapter 13.06.01 – Physical Security.

Please contact me to set up a discussion on the draft RAIs prior to issuance.

Thanks,

Rocky D. Foster
Project Manager
US Nuclear Regulatory Commission
Office of New Reactors
Division of New Reactor Licensing
BWR Projects Branch (NGE)
Mai Stop T6D38M
(301) 415-5787
rocky.foster@nrc.gov

Hearing Identifier: SouthTexas34Public_EX
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Subject: Draft RAIs 4950
Sent Date: 8/25/2010 3:18:45 PM
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From: Foster, Rocky

Created By: Rocky.Foster@nrc.gov

Recipients:
"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
"fjpuleo@stpegs.com" <fjpuleo@stpegs.com>
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Request for Additional Information No. 4950 Revision 3

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 13.06.01 - Physical Security - Combined License
Application Section: 13.6

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

13.06.01-***

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, several maps do not accurately reflect the site layout for STP units 3 & 4. The information provided to depict scenarios on the maps on pages 104 and 111 is not legible. Revise and submit maps that are legible that depict the written scenarios and the current Unit 3 & 4 site layout.
Regulatory Requirement: Part 73, appendix C, Section II.B.3.c (v), requires licensees to develop, implement, and maintain a written protective strategy to be documented in procedures that describes in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan.

13.06.01-***

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1 page 17, communication equipment is discussed for the STP units 3 & 4. Is there specific communication equipment to contact STP units 1 & 2? Describe the method that the STP units 3 & 4 contact Units 1 & 2 during security contingency events and where is this method documented? Revise the Interdiction Capability Evaluation to capture the response.
Regulatory Requirement: Part 73, appendix C, Section II.B.3.c(v)(4) Licensees shall develop, implement, and maintain a written protective strategy to be documented in procedures that describe in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan. The protective strategy shall: Contain a description of the physical security systems and measures that provide defense in depth such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.

13.06.01-***

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1 page 19, the conclusion of the evaluation is provided for the document. The conclusion does not describe the specific goals of the protective strategy described in the evaluation, and the specific physical protective strategy that provided the approach to interdict an adversary force as described in 10 CFR 73.1(a)(1)(i). Revise the Interdiction Capability Evaluation to capture the RAI response.

Regulatory Requirement: Part 73, appendix C, Section II.B.3.c (v), requires licensees to develop, implement, and maintain a written protective strategy to be documented in procedures that describes in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan.

13.06.01-***

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1page 15, Section 3.3.2, the most advantageous target identified by the target set panel is not consistent with the approach identified in Attachment 5, "Quality monitoring Report," page 75, or verbal interactions with the STP personnel during the 11/2009 site audit. Which approach is correct? Revise section 3.3.2 to address this discrepancy and how the approach meets the objective of an armed response team as written in 10 CFR 73, Appendix C, Section II, Nuclear Power Plant Safeguards Contingency Plans?

Regulatory Basis: Part 73, appendix C, Section II.B.3.c (v), requires licensees to develop, implement, and maintain a written protective strategy to be documented in procedures that describes in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan.

13.06.01-***

Describe how the location of pipelines, airports and hazardous material facilities has been accounted for in the implementation of the onsite protective strategy.

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.

13.06.01-***

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1 page 6, 1st paragraph, define the term "stand-alone". Revise the evaluation to reflect the definition.
Regulatory Basis: Part 73, appendix C, Section II.B.3.c (v), requires licensees to develop, implement, and maintain a written protective strategy to be documented in procedures that describes in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan.

13.06.01-***

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1, page 16, 1st paragraph describe natural and man-made features. Describe how these features are protected and revise the evaluation to reflect the method of protection.
Regulatory Requirement: Part 73, appendix C, Section II.B.3.c(v)(4) Licensees shall develop, implement, and maintain a written protective strategy to be documented in procedures that describe in detail the physical protection measures, security systems and deployment of the armed response team relative to site specific conditions, to include but not be limited to, facility layout, and the location of target set equipment and elements. The protective strategy should support the general goals, operational concepts, and performance objectives identified in the licensee's safeguards contingency plan. The protective strategy shall: Contain a description of the physical security systems and measures that provide defense in depth such as physical barriers, alarm systems, locks, area access, armaments, surveillance, and communications systems.