

## PMSTPCOL PEmails

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**From:** Foster, Rocky  
**Sent:** Tuesday, September 07, 2010 8:35 AM  
**To:** Puleo, Frederick  
**Cc:** STPCOL  
**Subject:** RAI Letter 361  
**Attachments:** ML102450366.pdf

Fred,

Attached is the final RAI letter 361 associated with Chapter 13.06.01 for your review.

Thanks,

Rocky

**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 2380

**Mail Envelope Properties** (26E42474DB238C408C94990815A02F090A82B752EA)

**Subject:** RAI Letter 361  
**Sent Date:** 9/7/2010 8:35:12 AM  
**Received Date:** 9/7/2010 8:35:13 AM  
**From:** Foster, Rocky

**Created By:** Rocky.Foster@nrc.gov

**Recipients:**  
"STPCOL" <STP.COL@nrc.gov>  
Tracking Status: None  
"Puleo, Frederick" <fjpuleo@STPEGS.COM>  
Tracking Status: None

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

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MESSAGE	132	9/7/2010 8:35:13 AM
ML102450366.pdf	89179	

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

September 2, 2010

Mr. Scott Head, Manager  
Regulatory Affairs  
STP Nuclear Operating Company  
P. O. Box 289  
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 361 RELATED TO  
SRP SECTION 13.06.01 FOR THE SOUTH TEXAS PROJECT COMBINED  
LICENSE APPLICATION

Dear Mr. Head:

By letter dated September 20, 2007, STP Nuclear Operating Company (STP) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U. S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within **30** days of the date of this letter. If changes are needed to the safety analysis report, the staff requests that the RAI response include the proposed wording changes.

S. Head

-2-

If you have any questions or comments concerning this matter, I can be reached at 301-415-5787 or by e-mail at [Rocky.Foster@nrc.gov](mailto:Rocky.Foster@nrc.gov) or you may contact George Wunder at 301-415-1494 or [George.Wunder@nrc.gov](mailto:George.Wunder@nrc.gov).

Sincerely,

**/RA/**

Rocky D. Foster, Project Manager  
BWR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-012, 52-013

eRAI Tracking No. 4950

Enclosure:  
Request for Additional Information

cc: William Mookhoek  
Fred Puleo  
Loree Elton

S. Head

-2-

If you have any questions or comments concerning this matter, I can be reached at 301-415-5787 or by e-mail at [Rocky.Foster@nrc.gov](mailto:Rocky.Foster@nrc.gov) or you may contact George Wunder at 301-415-1494 or [George.Wunder@nrc.gov](mailto:George.Wunder@nrc.gov).

Sincerely,

**/RA/**

Rocky D. Foster, Project Manager  
BWR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

Docket Nos. 52-012, 52-013

eRAI Tracking No. 4950

Enclosure:  
Request for Additional Information

cc: William Mookhoek  
Fred Puleo  
Loree Elton

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**ADAMS Accession No. ML102450366**

NRO-002

OFFICE	RSRLB	BC:RSRLB	BWR/PM	BWR/L-PM
NAME	VWilliams	RFelts	RFoster	GWunder
DATE	8/18/2010	8/18/2010	9/2/2010	8/25/2010

**\*Approval captured electronically in the electronic RAI system.**

**OFFICIAL RECORD COPY**

**Request for Additional Information No. 4950 Revision 3**

**9/2/2010**

**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)**

**13.06.01-74**

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.

**13.06.01-75**

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.

Enclosure

### 13.06.01-76

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.

### 13.06.01-77

Interdiction Capability Evaluation South Texas Project units 3 & 4 revision 1 page 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.

### 13.06.01-78

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.

### 13.06.01-79

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.

### 13.06.01-80

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.