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10 CFR 50.4  
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December 3, 2010

UN#10-269

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016  
Revision to the Calvert Cliffs Nuclear Power Plant, Unit 3, Combined License  
Application  
Physical Security – Inspections, Tests, Analyses, and Acceptance Criteria

References: 1) Greg Gibson to Document Control Desk, Response to Request for Additional  
Information for the Calvert Cliffs Nuclear Power Plant, Unit 3, RAI 197, Physical  
Security Hardware – Inspections, Tests, Analyses, and Acceptance Criteria,  
UN#10-021, dated February 2, 2010.

2) NUREG - 0800, Standard Review Plan, 14.3.12, Physical Security Hardware –  
Inspections, Tests, Analyses, and Acceptance Criteria, Revision 1 – May 2010

The purpose of this letter is to submit a revision to the Physical Security - Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC), as submitted in Appendix B of Part 10 of the Calvert Cliffs Nuclear Power Plant (CCNPP) Unit 3 Combined License Application (COLA), Revision 6. The CCNPP Unit 3 COLA Physical Security ITAAC had been revised in Reference 1.

This change provides enhanced consistency in wording, format, and level of detail with Reference 2.

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The Physical Security ITAAC items in the COLA Part 10 Appendix B Table 2.2.1 address Reference 2 items: 1(b), 2(a); 2(b), 2(c), 3(a); 3(b), 3(c); 4(a); 4(b), 4(c); 6; 8(a); 9; and 15 for non-vital areas. Vital Area requirements are addressed in the U.S. EPR Final Safety Analysis Report.

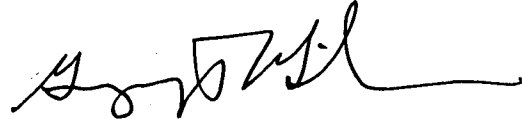
A Licensing Basis Document Change Request has been initiated to incorporate this change into a future revision of the COLA.

Our response does not include any new regulatory commitments. This letter does not contain any sensitive or proprietary information.

If there are any questions regarding this transmittal, please contact me at (410) 470-4205, or Mr. Wayne Massie at (410) 470-5503.

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

Executed on December 03, 2010



Greg Gibson

Enclosure: Revised Physical Security - Inspections, Tests, Analyses, and Acceptance Criteria, Calvert Cliffs Nuclear Power Plant, Unit 3

cc: Surinder Arora, NRC Project Manager, U.S. EPR Projects Branch  
Laura Quinn, NRC Environmental Project Manager, U.S. EPR COL Application  
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application (w/o enclosure)  
Loren Plisco, Deputy Regional Administrator, NRC Region II (w/o enclosure)  
Silas Kennedy, U.S. NRC Resident Inspector, CCNPP, Units 1 and 2  
U.S. NRC Region I Office

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**Enclosure**

**Revised Physical Security - Inspections, Tests, Analyses, and Acceptance Criteria,  
Calvert Cliffs Nuclear Power Plant, Unit 3**

**COLA Impact**

COLA Part 10, ITAAC and ITAAC Closure, Appendix B Table 2.2.1 will be updated as follows in a future COLA revision:

**Table 2.2-1—Physical Security ITAAC**

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
1.-4 Access to vital equipment requires passage through at least two physical barriers.	1.4 <del>Inspections will be performed of</del> <u>Vital equipment physical barriers will be inspected.</u>	1.-4 Vital equipment is located within a protected area such that access to the <del>as-built</del> vital equipment requires passage through at least two physical barriers.
4-2 (a) Physical barriers for the protected area perimeter are not part of vital area barriers.	4-2 (a) <del>Inspections of the</del> <u>The protected area perimeter barriers will be performed inspected.</u>	4-2 (a) Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.
4-2 (b) Penetrations through the protected area barrier <del>must be</del> <u>whose path area exceeds the minimum specified in the site-specific Security Assessment</u> are secured and monitored in a manner that prevents or delays, and detects the exploitation of any penetration.	4-2 (b) <del>Inspections will be performed of</del> <u>Ppenetrations through the protected area barrier whose path area exceeds the minimum specified in the site-specific Security Assessment will be inspected.</u>	4-2 (b) Penetrations and openings through the protected area barrier <u>whose path area exceeds the minimum specified in the site-specific Security Assessment</u> are secured and monitored by intrusion detection equipment to prevent, delay and detect exploitation of the penetration or opening.
4-2 (c) Unattended openings that intersect a security boundary, such as underground pathways, <del>must be</del> <u>whose path area exceeds the minimum specified in the site-specific Security Assessment</u> are protected by a physical barrier and monitored by intrusion detection equipment or <del>observed</del> <u>provided surveillance</u> at a frequency sufficient to detect exploitation.	4-2 (c) <del>Inspections will be performed of</del> <u>Unattended openings within the protected area barriers whose path area exceeds the minimum specified in the site-specific Security Assessment will be inspected.</u>	4-2 (c) Unattended openings (such as underground pathways) that intersect a security boundary (such as the protected area barrier), <u>whose path area exceeds the minimum specified in the site-specific Security Assessment</u> are protected by a physical barrier and monitored by intrusion detection equipment or <del>observed</del> <u>provided surveillance</u> at a frequency sufficient to detect exploitation.

Design Commitment	Inspections. Tests. Analyses	Acceptance Criteria
<p>4-3 (a) Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allows <u>20 feet of sufficient size for observation and assessment on either side of the barrier, except for areas where permanent buildings do not allow a 20 foot observation distance.</u></p>	<p>4-3 (a) <del>Inspections of the isolation zones</del> <u>The outdoor areas adjacent to the physical barrier will be performed inspected.</u></p>	<p>4-3 (a) The isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and that allow <u>20 feet of 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, except for areas where permanent buildings do not allow a 20 foot observation distance.</u></p>
<p>4-3 (b) <del>The isolation zones shall be monitored with intrusion detection and assessment equipment and provide, at all times, the capability to detect and assess unauthorized persons capable of providing detection and assessment of activities within the isolation zone.</del></p>	<p>4-3 (b) <del>An inspection of t</del> <u>The intrusion detection and assessment equipment within for monitoring the isolation zones will be performed inspected.</u></p>	<p>4-3 (b) <del>The isolation zones are equipped with monitored by intrusion detection and assessment equipment and provide, at all times, the capability to detect and assess unauthorized persons capable of providing detection and assessment of activities within the isolation zone.</del></p>
<p>4-3 (c) <del>Areas Wwhere permanent buildings do not allow a 20 foot sufficient size observation distance on between the intrusion detection system and the inside of the protected area barrier (e.g., the building walls are immediately adjacent to, or are an integral part of, the protected area barrier) are monitored by intrusion detection and assessment equipment that detects the attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of detected activities.</del></p>	<p>4-3 (c) <del>Inspections of areas of the protected area perimeter barrier that do not have isolation zones will be inspected</del> <u>isolation zones will be performed.</u></p>	<p>4-3 (c) <del>Areas Wwhere permanent buildings do not allow a 20 foot sufficient size observation distance between the intrusion detection system on the inside of 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 detected activities and the sufficient size observation distance does not apply.</del></p>

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
<p>4.4 (a) <u>The perimeter intrusion detection system (IDS) 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 alarm stations, (central and secondary alarm stations).</u></p>	<p>4.4 (a) Tests, inspections, or a combination of tests and inspections of the intrusion detection system will be performed.</p>	<p>4.4 (a) The intrusion detection system can detect penetration or attempted penetration of the protected area perimeter barrier <u>before completed penetration of the barrier, and subsequent alarms annunciate concurrently in at least two continuously manned onsite alarm stations, (central and secondary alarm stations).</u></p>
<p>4.4 (b) <u>The perimeter assessment equipment is capable of providing video image recording with real-time and play-back capability that can provide assessment, of detected activities 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 station, (central and secondary stations) at the protected area perimeter barrier.</u></p>	<p>4.4 (b) Tests, inspections or a combination of tests and inspections of the video assessment equipment will be performed.</p>	<p>4.4 (b) <u>The perimeter assessment equipment is capable of providing video image recording with real-time and play-back capability that can provide assessment, of detected activities 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 station, (central and secondary stations) at the protected area perimeter barrier.</u></p>
<p>4.4 (c) <u>The 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.</u></p>	<p>4.4 (c) Tests, inspections or a combination of tests and inspections of the uninterruptible power supply will be performed.</p>	<p>4.4 (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.</p>

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
<p>4.5 <u>5.</u> The external walls, doors, <u>windows</u>, ceilings, and floors in the <del>Main Control Room, Central Alarm Station, Secondary Alarm Station</del> and the last access control function for access to the protected area are bullet resistant, to the weapons of the DBT. <u>at least Underwriter's Laboratories Ballistic Standard 752, "The Standard of Safety for Bullet-Resisting Equipment," Level 4.</u></p>	<p>4.5 <u>5.</u> Type test, analysis, or a combination of type test and analysis of the external walls, doors, <u>windows</u>, ceilings, and floors, in the <del>Main Control Room, Central Alarm Station, Secondary Alarm Station</del> and the last access control function for access to the protected area will be performed.</p>	<p>4.5 <u>5.</u> A report exists and concludes that the walls, doors, <u>windows</u>, ceilings, and floors in the <del>Main Control Room, Central Alarm Station, Secondary Alarm Station</del> and the last access control function for access to the protected area are bullet resistant to the weapons of the DBT. <u>at least Underwriter's Laboratories Ballistic Standard 752, "The Standard of Safety for Bullet-Resisting Equipment," Level 4.</u></p>
<p>4.6 <u>6 (a)</u> Access control points are established to control personnel and vehicle access into the protected area.</p>	<p>4.6 <u>6 (a)</u> Tests, inspections, or combination of tests and inspections of installed systems and equipment will be performed.</p>	<p>4.6 <u>6 (a)</u> Access control points that exist for the protected area <u>and are configured to control access.</u></p>
<p>4.7 <u>6 (b)</u> Access control points are established <u>with equipment to for the detection of firearms, explosives, and incendiary devices or other items which could be used to commit radiological sabotage</u> at the protected area personnel access points.</p>	<p>4.7 <u>6 (b)</u> Tests, inspections, or combination of tests and inspections of installed systems and equipment will be performed.</p>	<p>4.7 <u>6 (b)</u> <u>Access control points are established with equipment for the The detection of equipment at the access control points is capable of detecting firearms, explosives, and incendiary devices or other items which could be used to commit radiological sabotage</u> at the protected area personnel access points.</p>

Design Commitment	Inspections. Tests. Analyses	Acceptance Criteria
<p>4.8 7. An access control system with <u>a</u> numbered <u>picture photo identification badge system</u> <del>badges</del> is installed for use by individuals who are authorized access to protected areas <u>and vital areas</u> without escort.</p>	<p>4.8 7. Tests of <del>t</del>The access control system with <u>and the</u> numbered <u>picture photo identification badges system</u> will be performed <u>tested</u>.</p>	<p>4.8 7. The <u>An access control authorization system with a</u> numbered <u>photo identification badge system</u> is installed for use by individuals who are <u>picture badges can identify</u> and authorized <u>protected area access only to protected areas and vital areas</u> without <u>escort these personnel with unescorted access authorization</u>.</p>
<p>4.9 8. Emergency exits through the protected area perimeter are alarmed <u>with intrusion detection devices</u> and secured by locking devices that allow prompt egress during an emergency.</p>	<p>4.9 8. Tests, inspections or a combination of tests and inspections of emergency exits through the protected area perimeter <u>and vital area boundaries</u> will be performed.</p>	<p>4.9 8. Emergency exits through the protected area perimeter <u>and vital area boundaries</u> are alarmed <u>with intrusion detection devices</u> and secured by locking devices that allow prompt egress during an emergency.</p>