

## PMTurkeyCOLPEM Resource

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**From:** Comar, Manny  
**Sent:** Friday, November 12, 2010 2:04 PM  
**To:** Antonio Fernandez; orthen, Richard; TurkeyCOL Resource; William Maher  
**Subject:** FW: Draft RAI 4901 related to SRP Section: 14.03.12 - Physical Security Hardware - Inspections, Tests, Analyses, and Acceptance Criteria for the Turkey Point Units 6 and 7 combined license application.  
**Attachments:** draft RAI 4901\_TPN.doc

FYI

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**From:** Comar, Manny  
**Sent:** Friday, November 12, 2010 1:23 PM  
**To:** 'Maria Morell'; 'Russell Shearer'  
**Cc:** Comar, Manny  
**Subject:** Draft RAI 4901 related to SRP Section: 14.03.12 - Physical Security Hardware - Inspections, Tests, Analyses, and Acceptance Criteria for the Turkey Point Units 6 and 7 combined license application.

To All,

Attached is the draft of RAI No:4901, regarding section 14.03.12 (Physical Security Hardware - Inspections, Tests, Analyses, and Acceptance Criteria for the Turkey Point Units 6 and 7 combined license application.

If you need a conference call to discuss the question(s) of the draft RAIs please contact me at 301-415-3863. Unless you request additional clarification we will normally issue the RAI as final within 3 to 5 days, from today.

Thanks

Manny Comar  
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NRO/DNRL/NWE1  
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**Options**

**Priority:** Standard

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**Recipients Received:**

Request for Additional Information No. 4901

Turkey Point Units 6 and 7  
Florida P and L

Docket No. 52-040 and 52-041

SRP Section: 14.03.12 - Physical Security Hardware - Inspections, Tests, Analyses, and Acceptance  
Criteria

Application Section: Part 10 - ITAAC

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

14.03.12-\*\*\*

RAI 14.03.12 – 1

Turkey Point Units 6 & 7, S-COL application revision 1 (dated 9/30/10) Part 10, License Conditions and ITAAC, Appendix B, Inspections, Tests, Analysis and Acceptance Criteria, specifies that the ITAAC for the physical security system that are in scope of the Westinghouse AP1000 are incorporated by reference from Tier 1, Table 2.6.9-1 of the Westinghouse DCD rev 17, and those ITAAC that are outside the scope of the DCD are provided in Table 2.6.9-2 of Part 10 of the PTN 6 & 7 application.

The staff requests that for clarification purposes the applicant provide a cross-reference table, indicating the applicant's view of which generic PS-ITAAC from NUREG-0800, Section 14.03.12 Appendix A are addressed by which items of revision 17 of the Westinghouse AP1000 DCD Tier 1 Table 2.6.9-1; which ITAAC are addressed in which item in revision 1 of the PTN 6 & 7 application, Part 10, Table 2.6.9-2; and which ITAAC are not addressed by either document. Revision 1 to NUREG-0800 Section 14.03.12 can be found on NRC ADAMS (Accession #: ML100970568).

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

14.03.12-\*\*\*

RAI 14.03.12 – 2

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 14.3.12 ITAAC 1(b), to meet the regulation in 10 CFR 73.55(e)(9)(i). Specifically, please explain what proposed alternative to NUREG-0800 Section 14.3.12 verifies that access to vital equipment requires passage through the protected area barrier. (Please explain how, in

conjunction with the referenced Westinghouse DCD Tier 1 Table 2.6.9-1 item 7(b), the proposed alternative addresses NUREG-0800 Section 14.3.12 ITAAC 1(b) consistent with the regulation in 10 CFR 73.55(e)(9)(i)). Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

10 CFR 73.55(e)(9) Vital areas. (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.

14.03.12-\*\*\*

RAI 14.03.12 – 3

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 Section 14.3.12 ITAAC 2(b) to meet the regulation in 10 CFR 73.559(e)(8)(ii). Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

10 CFR 73.55(e)(8) Protected Area (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.

14.03.12-\*\*\*

RAI 14.03.12 – 4

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 Section 14.3.12 ITAAC 2(c) to meet the regulation in 10 CFR 73.55(e)(4) and (e)(8)(ii). Please revise

Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

10 CFR 73.55(e)(4) Consistent with the stated function to be performed, openings in any barrier or barrier system established to meet the requirements of this section must be secured and monitored to prevent exploitation of the opening.

10 CFR 73.55(e)(8) Protected Area (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.

14.03.12-\*\*\*

RAI 14.03.12 – 5

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 Section 14.3.12 ITAAC 3(b) to meet the regulation in 10 CFR 73.55(e)(7)(i)(B) and (e)(7)(i)(C). Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

10 CFR 73.55(e)(7) Isolation Zone (i) An isolation zone must be maintained in outdoor areas adjacent to the protected area perimeter barrier. The isolation zone shall be: (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.

14.03.12-\*\*\*

RAI 14.03.12 – 6

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 Section 14.3.12 ITAAC 4(c) to meet the regulation in 10 CFR 73.55(i)(3)(vii). Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

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

14.03.12-\*\*\*

RAI 14.03.12 – 7

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 item 1 addresses NUREG-0800 Section 14.3.12 ITAAC 6 to meet the regulation in 10 CFR 73.55(e)(5). Specifically, please explain why item 1 of Table 2.6.9-2 does not reflect the criteria of a minimum bullet resistance of Underwriters Laboratory (UL) 752, Level 4, or National Institute of Justice (NIJ) Standard 0108.01 Type III, in section 11.4 of the PTN PSP, revision 1, consistent with the guidance in NUREG-0800 Section 14.3.12 ITAAC 6 and Regulatory Guide 5.76. Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

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.

14.03.12-\*\*\*

RAI 14.03.12 – 8

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 14.3.12 ITAAC 9, to meet the regulation in 10 CFR 73.55(e)(9)(i). Specifically, what proposed alternative to NUREG-0800 Section 14.3.12 states that a numbered photo identification badge system is installed for individuals with unescorted access to vital areas, consistent with the regulation in 10 CFR 73.55(g)(6)(ii)? Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

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

14.03.12-\*\*\*

RAI 14.03.12 – 9

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 Section 14.3.12 ITAAC 11(d) to meet the regulation in 10 CFR 73.55(i)(4)(iii). Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

10 CFR 73.55(i)(4) Alarm stations. (iii) Applicants for an operating license under the provisions of part 50 of this chapter, or holders of a combined license under the provisions of part 52 of this chapter, 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.

14.03.12-\*\*\*

RAI 14.03.12 – 10

Please explain how Turkey Point Units 6 & 7, S-COL application revision 1, Part 10, License Conditions and ITAAC, Table 2.6.9-2 addresses NUREG-0800 14.3.12 ITAAC 15, to meet the regulation in 10 CFR 73.55(e)(9)(i). Specifically, please explain what proposed alternative to NUREG-0800 Section 14.3.12 states that emergency exits though the protected area perimeter will be alarmed with intrusion detection devices and secured by locking devices that allow prompt egress during an emergency. (Please explain how, in conjunction with the referenced Westinghouse DCD Tier 1 Table 2.6.9-1 item 9, the proposed alternative addresses NUREG-0800 Section 14.3.12 ITAAC 15 consistent with the regulation in 10 CFR 73.55(e)(8)(iii) and (e)(9)(ii)). Please revise Table 2.6.9-2 as needed to provide the proposed alternatives to NUREG-0800 that meet the applicable regulation.

Regulatory Basis: 10 CFR 52.80(a) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. (2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.

10 CFR 73.55(e)(8) Protected area.(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) Vital areas. (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.