PMTurkeyCOLPEm Resource

From: Comar, Manny
Sent: Wednesday, September 08, 2010 4:19 PM
To: Antonio Fernandez; orthen, Richard; TurkeyCOL Resource; William Maher
Cc: Chwasz, Chris; Huyck, Doug; Comar, Manny; TurkeyCOL Resource
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 005 RELATED TO SRP SECTION 13.06- PHYSICAL SECURITY FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COMBINED LICENSE APPLICATION
Attachments: PTN-ltr-005-rai4899.pdf

All:

Attached is the RAI letter No. 005 related to SRP section 13.06-Physical Security for the Turkey Point Units 6 and 7 Combined License Application.

The Accession number is ML102510672

If you have any further questions, please feel free to contact me. Thanks

Manny Comar
Senior Project Manager
NRO/DNRL/NWE1
Nuclear Regulatory Commission
301-415-3863
mailto:manny.comar@nrc.gov

Hearing Identifier: TurkeyPoint_COL_Public
Email Number: 153

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D026005A53E5)

Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 005 RELATED TO SRP SECTION 13.06- PHYSICAL SECURITY FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COMBINED LICENSE APPLICATION
Sent Date: 9/8/2010 4:19:28 PM
Received Date: 9/8/2010 4:19:30 PM
From: Comar, Manny

Created By: Manny.Comar@nrc.gov

Recipients:
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"William Maher" <William.maher@fpl.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	470	9/8/2010 4:19:30 PM
PTN-ltr-005-rai4899.pdf	161483	

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

TurkeyPointRAIsPEm Resource

From: Comar, Manny
Sent: Wednesday, September 08, 2010 2:48 PM
To: TurkeyPointRAIsPEm Resource
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 005 RELATED TO SRP SECTION 13.06- PHYSICAL SECURITY FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COMBINED LICENSE APPLICATION
Attachments: PTN-RAI-LTR-005.doc

Hearing Identifier: TurkeyPoint_COL_eRAIs
Email Number: 7

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D026005A5315)

Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 005 RELATED TO SRP SECTION 13.06- PHYSICAL SECURITY FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COMBINED LICENSE APPLICATION
Sent Date: 9/8/2010 2:48:19 PM
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From: Comar, Manny

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Recipients:
"TurkeyPointRAIsPEm Resource" <TurkeyPointRAIsPEm.Resource@nrc.gov>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	8	9/8/2010 2:48:21 PM
PTN-RAI-LTR-005.doc	82426	

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Priority: Standard
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Reply Requested: No
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Expiration Date:
Recipients Received:

September 8, 2010

Mano K. Nazar
Senior Vice President and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop NNP/JB
700 Universe Blvd
Juno Beach, FL 33408-0420

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 005 RELATED TO SRP SECTION 13.06-PHYSICAL SECURITY FOR THE TURKEY POINT NUCLEAR PLANT UNITS 6 AND 7 COMBINED LICENSE APPLICATION

Dear Mr. Nazar:

By letter dated June 30, 2009, as supplemented by a letter dated August 7, 2009, Florida Power and Light submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced passive pressurized water reactors pursuant to 10 CFR Part 52. The 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 you are unable to provide a response within 30 days, please state when you will be able to provide the response. In the event the response submitted is incomplete, please indicate in the response when the complete response will be provided. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes. Your response should also indicate whether any of the information provided is to be withheld as exempt from public disclosure pursuant to 10 CFR 2.390.

If you have any questions or comments concerning this matter, you may contact me at 301-415-3863 or manny.comar@nrc.gov.

Sincerely,

/**RA**/

Manny Comar, Lead Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-040
52-041

Enclosure:
Request for Additional Information

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-3863 or manny.comar@nrc.gov.

Sincerely,

/**RA**/

Manny Comar, Lead Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-040
52-041
eRAI Tracking No. 4899

Enclosure:
Request for Additional Information

Distribution:

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NRO-002

OFFICE	RSRLB/BC	NWE1/PM	OGC	NWE1/L-PM
NAME	DHuyck*	MComar*	PMoulding*	MComar*
DATE	07/21/10	08/12/10	08/197/10	9/2/10

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information No. 4899

9/8/2010

Turkey Point Units 6 and 7
Florida P and L
Docket No. 52-040 and 52-041
SRP Section: 13.06 - Physical Security
Application Section: Part 8 - Physical Security Plan

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

RAI 13.06-1

Please provide additional detail in Physical Security Plan, Section 11.1, regarding the design, operation, and use in the physical protection program of vehicle barriers at the OCA checkpoint. In response to the RAI, please include additional detail in the PSP regarding normal position, conditions of operation of the VBS, normal power, backup power and control requirements, and the role of the VBS in the protective strategy. Provide details as to the purpose and design objectives of the VBS (minimum kinetic energy rating), and additional features that enhance the effectiveness of the VBS (vehicle speed reducing features such as: sharp road turns, steep road grades, serpentine or channeling barriers).

Regulatory Basis:

10 CFR 73.55(e)(1) The licensee shall: (i) Design, construct, install and maintain physical barriers as necessary to control access into facility areas for which access must be controlled or denied to satisfy the physical protection program design requirements of paragraph (b) of this section. (ii) Describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

10 CFR 73.55(e)(6) Owner Controlled Area. The licensee shall establish and maintain physical barriers in the owner controlled area as needed to satisfy the physical protection program design requirements of § 73.55(b).

RAI 13.06-2

Please provide additional detail with respect to Physical Security Plan, Section 11.1, regarding the location and design of the retaining wall. Please provide additional detail on the location of the wall, grade height on either side of the wall, waterway access to the wall, and tidal effects on the waterway elevation on the wall. Please provide a simple description of the wall (including the information requested above) in section 11.1 of the PSP, and please revise Figure 1 in the PSP to clearly identify the location of the wall.

Regulatory Basis:

10 CFR 73.55(e)(1) The licensee shall: (i) Design, construct, install and maintain physical barriers as necessary to control access into facility areas for which access must be controlled or denied to satisfy the physical protection program design requirements of paragraph (b) of this section. (ii) Describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

10 CFR 73.55(e)(6) Owner Controlled Area. The licensee shall establish and maintain physical barriers in the owner controlled area as needed to satisfy the physical protection program design requirements of § 73.55(b).

RAI 13.06-3

Please provide details in Physical Security Plan, Section 11.1,regarding the design, operation, and use in the physical protection program of the OCA nuisance fences illustrated in figure 1 of the PTN 6&7 PSP.

Regulatory Basis:

10 CFR 73.55(e)(1) The licensee shall: (i) Design, construct, install and maintain physical barriers as necessary to control access into facility areas for which access must be controlled or denied to satisfy the physical protection program design requirements of paragraph (b) of this section. (ii) Describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

10 CFR 73.55(e)(6) Owner Controlled Area. The licensee shall establish and maintain physical barriers in the owner controlled area as needed to satisfy the physical protection program design requirements of § 73.55(b).

RAI 13.06-4

Please provide details in Physical Security Plan, Section 11.1, regarding the design, operation, and use in the physical protection program of the delay fence illustrated in figure 1 (North-West corner of site) of the PTN 6&7 PSP.

Regulatory Basis:

10 CFR 73.55(e)(1) The licensee shall: (i) Design, construct, install and maintain physical barriers as necessary to control access into facility areas for which access must be controlled or denied to satisfy the physical protection program design requirements of paragraph (b) of this section. (ii) Describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

10 CFR 73.55(e)(6) Owner Controlled Area. The licensee shall establish and maintain physical barriers in the owner controlled area as needed to satisfy the physical protection program design requirements of § 73.55(b).

RAI 13.06-5

Please provide additional detail in Physical Security Plan, Section 11.2.1, regarding the design and use in the physical protection program of the passive components of the Vehicle Barrier System adjacent to the isolation zone. Please include additional detail in the PSP (a figure or description) of how the individual passive components listed form the barrier system. Please provide details as to the purpose and design objectives of the VBS (minimum kinetic energy rating, minimum anticipated standoff distance required, additional standoff distance required due to VBS barrier choice and placement), and additional features that enhance the effectiveness of the VBS (vehicle speed reducing features such as: sharp road turns, steep road grades, serpentine or channeling barriers).

Regulatory Basis.

10 CFR 73.55(e)(10)(i)(A). Licensees shall: "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."

10 CFR 73.55(e)(1)(ii). Describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

RAI 13.06-6

Please provide additional detail in Physical Security Plan, Section 11.2.1, regarding the design, operation, and use in the physical protection program of the components of the active Vehicle Barrier System. Please include additional detail in the PSP (a figure or description) of how the active and passive components form the barrier system for the sally port. Please provide details as to the purpose and design objectives of the VBS (minimum kinetic energy rating, minimum anticipated standoff distance required, additional standoff distance required due to VBS barrier choice and placement), and additional features that enhance the effectiveness of the VBS (vehicle speed reducing features such as: sharp road turns, steep road grades, serpentine or channeling barriers).

Regulatory Basis.

10 CFR 73.55(e)(10)(i)(A). Licensees shall: "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."

10 CFR 73.55(e)(1)(ii). Describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

RAI 13.06-7

Physical Security Plan, Section 11.2.2. Please describe the location of secondary power for active vehicle barriers and describe how this back-up power source is protected to ensure availability when needed. Please revise the PSP to include the normal position of all active vehicle barriers, and what components of the active vehicle barrier systems are supplied with backup power.

Regulatory Basis:

10 CFR 73.55(e)(10)(i)(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.

RAI 13.06-8

Physical Security Plan, Section 11.3. Please explain the inclusion of the reference to Westinghouse Technical Report (TR) 94 for the minimum distance from the power block to the PA barrier. In explaining this reference, please recognize that the PSP should be a stand-alone document.

Regulatory Basis:

10 CFR 52.79(d) If the combined license application references a standard design certification, then the following requirements apply: (1) The final safety analysis report need not contain information or analyses submitted to the Commission in connection with the design certification, *provided, however*, that the final safety analysis report must either include or incorporate by reference the standard design certification final safety analysis report and must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the site characteristics fall within the site parameters specified in the design certification.

RAI 13.06-9

Physical Security Plan, Section 14.4. Please provide information on searches associated with admittance to the owner-controlled area in compliance with 10 CFR 73.55(h)(2).

Regulatory Basis:

10 CFR 73.55(h)(2) Owner controlled area searches. (i) Where the licensee has established physical barriers in the owner controlled area, the licensee shall implement search procedures for access control points in the barrier. (ii) For each vehicle access control point, the licensee shall describe in implementing procedures areas of a vehicle to be searched, and the items for which the search is intended to detect and prevent access. Areas of the vehicle to be searched must include, but are not limited to, the cab, engine compartment, undercarriage, and cargo area. (iii) Vehicle searches must be performed by at least two (2) trained and equipped security personnel, one of which must be armed. The armed individual shall be positioned to observe the search process and provide immediate response. (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.

RAI 13.06-10

Physical Security Plan, Section 14.4 first mentions the “shift manager,” a role that is referenced throughout the PSP, T&QP and SCP. Please summarize the duties of the shift manager in reactor operations, describe in detail the shift manager’s role in the protective strategy, and place this description in the glossary or section 4.1.1 of the SCP. Also describe any training or testing required as part of the shift manager’s position in reactor operations, or as part of the shift manager’s role in the protective strategy as it relates to the requirements in 10 CFR 73.55(d)(3).

Regulatory Basis:

10 CFR Part 73, Appendix C. II. B.3.a. Organizational Structure. The safeguards contingency plan must describe the organization’s chain of command and delegation of authority during safeguards contingency events, to include a general description of how command and control functions will be coordinated and maintained.

10 CFR 73.55(d)(3) The licensee may not permit any individual to implement any part of the physical protection program unless the individual has been trained, equipped,

and qualified to perform their assigned duties and responsibilities in accordance with appendix B to this part and the Training and Qualification Plan. Non-security personnel may be assigned duties and responsibilities required to implement the physical protection program and shall: (i) Be trained through established licensee training programs to ensure each individual is trained, qualified, and periodically re-qualified to perform assigned duties. (ii) Be properly equipped to perform assigned duties. (iii) Possess the knowledge, skills, and abilities, to include physical attributes such as sight and hearing, required to perform their assigned duties and responsibilities.

RAI 13.06-11

Please provide additional detail in Physical Security Plan, Section 14.5, with respect to the location of the vital areas by building, floor elevation and compass direction.

Regulatory Basis:

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 73.2, *Definitions*, *Vital area* means any area which contains vital equipment. *Vital equipment* means any equipment, system, device, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Equipment or systems which would be required to function to protect public health and safety following such failure, destruction, or release are also considered to be vital.

RAI 13.06-12

Please provide additional information in Physical Security Plan, Section 15.1, with respect to how and where alternate lighting technology is used at PTN 6&7, and how the requirements of 10 CFR 73.55(i)(6) are met. Please revise the PSP to either clearly state that at a minimum, 0.2 foot candles, measured horizontally at ground level, of illumination is provided in the isolation zone and appropriate exterior areas of the protected area, or, to the extent alternate technologies are used, describe in the PSP where, under what conditions, and for what purpose each alternate lighting technology is used.

Regulatory Basis:

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. Alternatively, the licensee may augment the facility illumination system by means of low-light technology to meet the requirements of this section or otherwise implement the protective strategy. (iii) The licensee shall describe in the security plans how the lighting requirements of this section are met and, if used, the type(s) and application of low-light technology.

RAI 13.06-13

Physical Security Plan, Section 15.1, states that “This lighting is provided with back-up power.” Please provide additional information in the PSP to clearly indicate what lighting

is provided with back-up power. In addition, if the lighting is required for assessment purposes at the protected area perimeter, please describe whether it remains operable from an uninterruptible power supply (UPS) in the event of the loss of normal power, consistent with 10 CFR 73.55(i)(3)(vii).

Regulatory Basis:

10 CFR 73.55(i)(6)(iii) The licensee shall describe in the security plans how the lighting requirements of this section are met and, if used, the type(s) and application of low-light technology.

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.

RAI 13.06-14

The last paragraph of Physical Security Plan, Section 15.1, describes some use of low-light technology. Please describe (and revise the PSP as necessary) the equipment, applications and training for using this or other low or no-light technology used by armed responders or armed security officers during contingency events.

Regulatory Basis:

10 CFR 73.55(i)(6)(iii) The licensee shall describe in the security plans how the lighting requirements of this section are met and, if used, the type(s) and application of low-light technology.

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.

RAI 13.06-15

Please provide information in Physical Security Plan, Section 15.3, with respect to how the detection and assessment requirements in 10 CFR 73.55(e)(7)(i)(B) and (C) are met consistent with 10 CFR 73.55(8)(iv), when building walls or roofs comprise a portion of the PA barrier.

Regulatory Basis:

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: (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.

RAI 13.06-16

Please explain in Physical Security Plan, Section 15.3, whether the IDS is designed to detect attempted penetration of the protected area, as required by 10 CFR 73.55(e)(7)(i)(B).

Regulatory Basis:
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: (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.

RAI 13.06-17

With respect to Physical Security Plan, Section 15.3, please explain the following text (and revise as necessary): “While the portals are manned.... (omitted) ..., these systems are used to enhance detection capabilities of the IDS inside the portal.”

Regulatory Basis:
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.

10 CFR 73.55(g)(1)(i)(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. (C) Provide supervision and control over the badging process to prevent unauthorized bypass of access control equipment located at or outside of the protected area. (E) Assign an individual the responsibility for the last access control function (controlling admission to the protected area) and isolate the individual within a bullet-resisting structure to assure the ability of the individual to respond or summon assistance.

RAI 13.06-18

Please provide additional detail in Physical Security Plan, Section 15.3, regarding PA portal monitoring and VA intrusion detection equipment. Please clearly explain (and note in the PSP), what monitoring (personnel or electronic) occurs at each PA portal or vehicle checkpoint. Please describe how the IDS requirement for VA access portals is met (as stated in section 11.4 of the PSP).

Regulatory Basis:
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(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.

RAI 13.06-19

In Physical Security Plan, Section 15.3, please describe the UPS for the IDS.

Regulatory Basis:

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.

RAI 13.06-20

Please provide additional detail in Physical Security Plan, Section 15.4, regarding the video assessment equipment. Pease clarify the relationship between this video assessment equipment and the fixed and non-fixed cameras and surveillance systems equipment identified in Sections 15.1 and 15.2 of the PSP. If there is a distinction, please revise the PSP to note this. Describe how the real time video play-back recorder captures activities before and after each alarm annunciation.

Regulatory Basis:

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.

10 CFR 73.55(i)(5)(ii). The licensee shall provide continuous surveillance, observation, and monitoring of the owner controlled area as described in the security plans to detect and deter intruders and ensure the integrity of physical barriers or other components and functions of the onsite physical protection program. Continuous surveillance, observation, and monitoring responsibilities may be performed by security personnel during continuous patrols, through use of video technology, or by a combination of both.

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

RAI 13.06-21

Physical Security Plan, Section 15.5.1 states that OCA surveillance and response may be shared between Units 3 & 4 and Units 6 & 7. Please describe in the PSP why this response between sites will not have a detrimental effect on the protective strategy on either site, and explain whether the minimum numbers detailed in section 18 of the Units 6 & 7 PSP will be maintained.

Regulatory Basis:

10 CFR 73.55(k)(6)(i) Armed security officers, designated to strengthen onsite response capabilities, shall be onsite and available at all times to carry out their assigned response duties. (ii) The minimum number of armed security officers

designated to strengthen onsite response capabilities must be documented in the security plans.

RAI 13.06-22

Physical Security Plan, Section 16.2. Please explain the inclusion of the reference to Westinghouse Technical Report (TR) 94 for the location of the non-portable security communication secondary power system. In explaining this reference, please recognize that the PSP should be a stand-alone document.

Regulatory Basis:

10 CFR 52.79(d) If the combined license application references a standard design certification, then the following requirements apply: (1) The final safety analysis report need not contain information or analyses submitted to the Commission in connection with the design certification, *provided, however*, that the final safety analysis report must either include or incorporate by reference the standard design certification final safety analysis report and must contain, in addition to the information and analyses otherwise required, information sufficient to demonstrate that the site characteristics fall within the site parameters specified in the design certification.

10 CFR 73.55(c)(1) Licensee security plans must describe: (i) How the licensee will implement requirements of this section through the establishment and maintenance of a security organization, the use of security equipment and technology, the training and qualification of security personnel, the implementation of predetermined response plans and strategies, and the protection of digital computer and communication systems and networks.

RAI 13.06-23

Physical Security Plan, Section 18 details the minimum number of armed responders continuously in the protected area. Please explain how this number correlates with the expected number detailed in Westinghouse Technical Report (TR) 94, AP1000 Safeguards Assessment Report revision 4, assuming that PTN 6&7 will have only one person that fulfills the primary and secondary responsibility of DCD responder # 11 (page 22 of TR 94) for the two units. Please provide further detail regarding how the secondary responsibility will be fulfilled in the opposite unit as the single (assumed) individual that has the primary and secondary responsibility of responder # 11.

If PTN 6&7 has two individuals (one in each unit) that will be available to fulfill the primary and secondary responsibilities of DCD responder # 11, please explain whether these two individuals are included in the commitments in section 18 consistent with the site response strategy in the AP1000 Safeguards Assessment Report, which is incorporated by reference.

If PTN 6&7 has only one individual (in one unit) that will be available to fulfill the primary and secondary responsibilities of DCD responder # 11, please explain whether another individual would be stationed at the opposite unit to fulfill the secondary responsibility of responder #11. If so, please explain in section 18 of the PSP whether this additional individual would be required to meet the response requirements stated in the site response strategy in the AP1000 Safeguards Assessment Report, which is incorporated by reference.

Regulatory Basis:
10 CFR 73.55(k)(5)(i) The licensee shall determine the minimum number of armed responders necessary to satisfy the design requirements of § 73.55(b) and implement the protective strategy. The licensee shall document this number in the security plans. (ii) The number of armed responders shall not be less than ten (10). (iii) Armed responders shall be available at all times inside the protected area and may not be assigned other duties or responsibilities that could interfere with their assigned response duties.

RAI 13.06-24

Physical Security Plan, Section 18 states that armed responders are continuously in the protected area, including another area. Explain (and revise the PSP as necessary) how Armed Responders in this other area will meet the response requirements described in TR 94, AP1000 Safeguards Assessment Report, assuming that they would have to relocate to their response positions within the timeframes assumed in TR 94.
Regulatory Basis:
10 CFR 73.55(k)(5)(iii) Armed responders shall be available at all times inside the protected area and may not be assigned other duties or responsibilities that could interfere with their assigned response duties.

RAI 13.06-25

With respect to Part 8, Physical Security Plan, Section 2, Performance Objectives (Page 3), and Section 17, Review, Evaluation and Audit of the Physical Security Program (Page 32): Describe how the requirements of 10 CFR 73.58 for managing safety/security interface will be met. Provide descriptions in the FSAR (i.e., Part 2) that describe how plant management controls and process will be applied to meet 10 CFR 73.58 to manage the safety/security for the PTN Units 6 and 7.

Regulatory Basis:
Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) applications include how the applicant will meet the requirements of 10 CFR 73. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” Title 10 CFR 73.58 states that each licensee shall assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security.