

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Wednesday, March 16, 2011 3:57 PM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; cp34-rai-luminant@mnes-us.com; Diane Yeager; Eric.Evans@luminant.com; joseph tapia; Kazuya Hayashi; Matthew.Weeks@luminant.com; MNES RAI mailbox; Russ Bywater  
**Cc:** ComanchePeakCOL Resource; Galvin, Dennis  
**Subject:** Comanche Peak RCOL Chapter 14 - RAI Number 211  
**Attachments:** RAI 5494 (RAI 211).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within **35** calendar days of March 16, 2011.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed changes.

thanks,

Stephen Monarque  
U. S. Nuclear Regulatory Commission  
NRO/DNRL/NMIP  
301-415-1544

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 1270

**Mail Envelope Properties** (9C2386A0C0BC584684916F7A0482B6CA1E09727941)

**Subject:** Comanche Peak RCOL Chapter 14 - RAI Number 211  
**Sent Date:** 3/16/2011 3:56:45 PM  
**Received Date:** 3/16/2011 3:56:46 PM  
**From:** Monarque, Stephen

**Created By:** Stephen.Monarque@nrc.gov

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**Post Office:** HQCLSTR02.nrc.gov

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RAI 5494 (RAI 211).docx	24064	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Request for Additional Information (RAI) No. 5494, COLA Revision 1

RAI Letter Number 211

3/16/2011

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035

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

Application Section: Part 2, FSAR Chapter 14; Part 10, Test Abstract dated 12-09-10

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

14.03.12-1

**(U)** Part 2, Chapter 1.0, Section 1.9.1 Conformance with Regulatory Guides (Page 1.9-1): Identify Division 5 (Materials and Plant Protection) in COLA, Part 2, Chapter 1.0, Table 1.9-201 that were applied to meet regulatory requirements of 10 CFR 73 (e.g., RG 5.7, 5.44, 5.66, 5.69, 5.75, 5.76, etc.). Also identify applicable regulatory guides for material control and accounting that were applied (and exceptions) for meeting requirements 10 CFR 74, for the requested Part 70 material license in Table 1.9-201 (Division 5 RG).

**(U)** Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i), (ii), and (iv) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and provide descriptions of implementation of the physical security plan and safeguards contingency plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the design basis threat (DBT) and maintain at all time such capabilities. RG 1.206 provides guidance on the format and content for COL applications, which conformance, provides an acceptable method for meeting requirement of content of application. RG 5.69 provides detail descriptions for adversarial characteristics for the DBT that the applicant must protect with high assurance to meet performance requirements of 10 CFR 73.55(b). The application states that Division 5 RGs provide methods in whole or in parts for meeting requirements of 10 CFR 73, and are identified in security specific sections of the COL Part 8 (security plans). However, the information in Part 8 of the application was not included in Part 2 Section 1.9 regarding conformance with RGs. For completeness and accuracy, appropriate Division 5 RGs should be identified in Section 1.9 (Table 1.9-201), along with other RGs.

14.03.12-2

**(U)** Part 10, "ITAAC and Proposed License Conditions, Appendix C, Physical Security Hardware" (Pages 47-52) and Part 2, FSAR, Chapter 14, Section 14.3.4.12, "ITAAC for Physical Security Hardware" (Page 14.4-2): Provide a reference to the "Comanche Peak Unit 3 and 4 Physical Security Hardware ITAAC Abstracts," submitted by letter dated December 9, 2010, in the appropriate section of the COL application (e.g., Part 10, Appendix C, 'Physical Security Hardware') to clearly incorporate the test abstracts supporting the site specific physical security inspections, tests, analyses, and acceptance criteria (ITAAC) identified in Appendix C.

**(U)** Regulatory Basis: Subpart C, Title 10 CFR 52.80 requires that the application must contain the proposed inspections, tests, and analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria are 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. The COL Information Item 14.3(3) of the standard US-APWR requires that COL applicant identify site specific physical security hardware ITAAC. The test abstracts provides assurance for verification of key designs, performances, and functions of security systems and hardware, the appropriate Inspections, Tests, and Analyses (ITA) needed, and the appropriate acceptance criteria to verify security performance and functions in accordance with design for closure of identified site specific ITAAC. The applicant's test abstract submitted by letter dated December 9, 2010 has not been incorporated by reference in Chapter 14.3.4.12 or appropriate section to establish the test abstracts supporting the site specific physical security ITAAC.

14.03.12-3

**(U)** Comanche Peak, Unit 3 and 4 Physical Security Hardware ITAAC Abstracts," submitted by letter dated December 9, 2010, Section 3.5, "ITAAC Nos. 4.a, 4.b, and 4.c (Protected Area Perimeter Intrusion Detection System)," (Page 4-5): Describe the test method (ITA) in item C of the test abstract for the verifying the video playback systems that will address the test objective item 3, "[t]o verify that the video playback system provide real-time and playback video after each alarm annunciation.

**(U)** Regulatory Basis: Subpart C, Title 10 CFR 52.80 requires that the application must contain the proposed inspections, tests, and analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria are 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. COL information item 14.3(3) of the standard US-APWR requires that COL applicant identify site specific ITAAC. The test abstracts provided did not specify or included the test method(s) for verifying the capabilities of video playback system of ITAAC No. 4.b.

14.03.12-4

**(U)** Comanche Peak Unit 3 and 4 Physical Security Hardware ITAAC Abstracts," submitted by letter dated December 9, 2010, Section 3.9, "ITAAC No. 7 (Vehicle Barrier System)." (Page 8-9): Describe the appropriate test method in item C of the test abstract for the physical verification that the as-built location of the VBS (passive and active systems) installed and as configured and located meet or exceeds the minimum required standoff distance as analyzed and reviewed.

**(U)** Regulatory Basis: Subpart C, Title 10 CFR 52.80 requires that the application must contain the proposed inspections, tests, and analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria are 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. COL information item 14.3(3) of the standard US-APWR requires that COL applicant identify site specifics ITAAC. The test abstracts supporting the ITAAC did not include physical inspection that the as-built location that is prudent with the analysis or review of final design and required minimum standoff distance for ITAAC No. 7.

14.03.12-5

5. **(U)** Part 10, "ITAAC and Proposed License Conditions, Appendix C, Physical Security Hardware," Table C-1, "Physical Security Hardware Inspections, Tests, Analyses, and Acceptance Criteria," ITAAC Nos. 3.a and 3.b (Page 48) and Comanche Peak, Unit 3 and 4 Physical Security Hardware ITAAC Abstracts," submitted by letter dated December 9, 2010, Section 3.4, "ITAAC #3.a.ii and #3.b.ii (Isolation Zone)," (Pages 4-5) and ITAAC Nos. 16.a-2 and 16.b-2 (Page 52) and Comanche Peak Unit 3 and 4 Physical Security Hardware ITAAC Abstracts," submitted by letter dated December 9, 2010, Section 3.26, "ITAAC #16.a.ii and #16.b.ii (SAS Communications)," (Pages 16-17): Identify physical security hardware ITAAC conforming to NUREG 0800, Standard Review Plan (SRP) 14.3.12, as ITAAC No. 3(c) and No. 16(c) in Table C-1, "Physical Security Hardware inspections, Test, Analyses, and Acceptance Criteria [6 sheets]." Specifically, identify ITAAC No. 3(c) which establishes design commitments, ITA, and acceptance criteria for areas where permanent buildings do not allow sufficient observation distance between the intrusion detection system and the protected area barrier (e.g., the building walls are immediately adjacent to, or are an integral part of the protected area barrier) will be monitored with intrusion detection and assessment equipment that is designed to detect the attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of detected activities. The ITAAC No. 16(c) establishes to the verification that nonportable communications equipment in the secondary alarm stations (which is outside the scope of the US-APWR DCD) will remain operable from an independent power source in the event of loss of normal power. In addition, provide the appropriate description of supporting test abstracts.

**(U)** Regulatory Basis: Subpart C, Title 10 CFR 52.80 requires that the application must contain the proposed inspections, tests, and analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests,

and analyses are performed and the acceptance criteria are 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. The USAPWR DCD COL information item 14.3(3) requires that COL applicant identify site specific ITAAC. The test abstract objectives and test method adequately addressed the verification of both the CAS and SAS capability to continuous communications with security personnel and remain functional when operating on uninterruptible backup power supply upon loss of normal power. Part 10, Appendix C, Table C-1, did not identify the specific design commitments as a site specific physical security ITAAC conforming to SRP 14.3.12. The revisions to the US-APWR DCD include reserved ITAAC that conforms with SRP 14.3.12, ITAAC No. 3(c) and 16(c), which are to be addressed as COL Information Item 14.3(3). Test abstract in Section 3.26, describe verification of the continued capabilities for communications with loss of normal power, but does not specifically identify ITAAC that conforms with SRP 14.3.12, ITAAC No. 16(c). Table C-1, "Physical Security Hardware Inspections, Tests, Analyses, and Acceptance Criteria," has not been updated with supporting test abstracts.