



Eugene S. Grecheck
Vice President
Nuclear Development

Dominion Energy, Inc. • Dominion Generation
Innsbrook Technical Center
5000 Dominion Boulevard, Glen Allen, VA 23060
Phone: 804-273-2442, Fax: 804-273-3903
E-mail: Eugene.Grecheck@dom.com

March 22, 2011

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Serial No. NA3-11-005R
Docket No. 52-017
COLWDC

DOMINION VIRGINIA POWER
NORTH ANNA UNIT 3 COMBINED LICENSE APPLICATION
SRP13.06: RESPONSE TO RAI LETTER 55

On February 08, 2011, the NRC requested additional information to support the review of certain portions of the North Anna Unit 3 Combined License Application (COLA). The letter contained twenty-five Request for Additional Information (RAI) Questions. The responses to the following thirteen RAIs are provided in Enclosures 1 through 13:

- RAI 5232 Question 13.06-10 Security Plans in Part 8 of the COLA
- RAI 5232 Question 13.06-13 Add Reference to Part 52 to PSP
- RAI 5232 Question 13.06-14 Clarify Physical Layout
- RAI 5232 Question 13.06-15 Clarify Requirements for Security Contractors
- RAI 5232 Question 13.06-16 Editorial
- RAI 5232 Question 13.06-19 Clarify Wording for Vital Area Access Control
- RAI 5232 Question 13.06-20 Clarify Vital Areas
- RAI 5232 Question 13.06-21 Clarify Vital Areas
- RAI 5232 Question 13.06-23 Describe Protection of Spent Fuel Pool
- RAI 5232 Question 13.06-24 Clarify Location of BREs
- RAI 5232 Question 13.06-25 Explain Description of Outer Barrier
- RAI 5232 Question 13.06-26 Clarify Site Specific Information in the PSP
- RAI 5232 Question 13.06-29 Describe Controls for SGI

A report is being prepared which will provide the detailed information requested in the remaining twelve RAIs 13.06-9, 13.06-11, 13.06-12, 13.06-17, 13.06-18, 13.06-22, 13.06-27, 13.06-28, 13.06-30, 13.06-31, 13.06-32, and 13.06-33. The report and responses to these RAIs will be submitted by June 1, 2011.

This information will be incorporated into a future submission of the North Anna Unit 3 COLA, as described in the enclosures.

Please contact Regina Borsh at (804) 273-2247 (regina.borsh@dom.com) if you have questions.

Very truly yours,

Eugene S. Grecheck

D089
NRO

Enclosures:

1. Response to RAI Letter Number 55, RAI 5232 Question 13.06-10
2. Response to RAI Letter Number 55, RAI 5232 Question 13.06-13
3. Response to RAI Letter Number 55, RAI 5232 Question 13.06-14
4. Response to RAI Letter Number 55, RAI 5232 Question 13.06-15
5. Response to RAI Letter Number 55, RAI 5232 Question 13.06-16
6. Response to RAI Letter Number 55, RAI 5232 Question 13.06-19
7. Response to RAI Letter Number 55, RAI 5232 Question 13.06-20
8. Response to RAI Letter Number 55, RAI 5232 Question 13.06-21
9. Response to RAI Letter Number 55, RAI 5232 Question 13.06-23
10. Response to RAI Letter Number 55, RAI 5232 Question 13.06-24
11. Response to RAI Letter Number 55, RAI 5232 Question 13.06-25
12. Response to RAI Letter Number 55, RAI 5232 Question 13.06-26
13. Response to RAI Letter Number 55, RAI 5232 Question 13.06-29

Commitments made by this letter:

1. Incorporate proposed changes in a future COLA submission.
2. Submit responses to remaining RAIs by June 1, 2011.

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

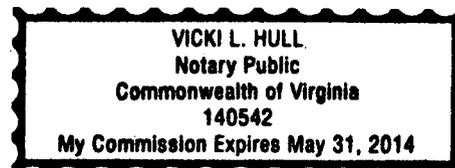
The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President-Nuclear Development of Virginia Electric and Power Company (Dominion Virginia Power). He has affirmed before me that he is duly authorized to execute and file the foregoing document on behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 22nd day of March, 2011.

My registration number is 140542 and my

Commission expires: May 31, 2014

Vicki L. Hull
Notary Public



cc: U. S. Nuclear Regulatory Commission, Region II
C. P. Patel, NRC
T. S. Dozier, NRC
J. T. Reece, NRC

ENCLOSURE 1

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-10

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

North Anna Unit 3

Dominion

Docket No. 52-017

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-10

U) Part 2, Section 13.6,1, Physical Security - Combined License (Page 13-78): Indicate that security plans are submitted as Part 8 of the COL application.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for COL 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."

The indication that Part 8 of the COL application contains security plans would clarify that security plans are not in a separate licensing document, but is part of the COL application.

Dominion Response

FSAR Sections 13.6 and 13.6.1 will be revised as indicated on the attached markup to clarify that security plans were submitted as part of the COL application.

Proposed COLA Revision

FSAR Sections 13.6 and 13.6.1 will be revised as indicated on the attached markup.

Markup of North Anna COLA

The attached markup represents Dominion's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by revisions to the DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

13.6 Physical Security

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

STD COL 13.6(1)

Replace the first paragraph in DCD Subsection 13.6 with the following:

The Security Plan consists of the physical security plan, training and qualification plan, the safeguards contingency plan. The Security Plan and Cyber Security Plan provided in COLA Part 8 are submitted to the NRC ~~as separate licensing documents~~ to fulfill the requirements of 10 CFR 52.79(a)(35) and 10 CFR 52.79(a)(36). The Security Plan and Cyber Security Plan meet the requirements contained in 10 CFR 26 and 10 CFR 73 and will be maintained in accordance with the requirements of 10 CFR 52.98. The Security Plan is categorized as security safeguards Information and is withheld from public disclosure pursuant to 10 CFR 73.21.

NAPS COL 13.6(1)

Table 13.4-201 provides milestones for security program implementation.

13.6.1 Physical Security – Combined License

STD COL 13.6(2)**

Replace the content of DCD Subsection 13.6.1 with the following:

As stated above, the Security Plan and the Cyber Security Plan are submitted to the NRC ~~as separate licensing documents~~ to fulfill the requirements of 10 CFR 52.79(a)(35) and 10 CFR 52.79(a)(36). The site specific physical security features and capabilities that are beyond the scope of the certified standard plant design are described in the physical security plan (PSP) (Ref. 13.06-201) and in Section 13.6.2 below.

13.6.2 US-APWR Physical Security

NAPS COL 13.6(2)
NAPS COL 13.6(3)

Insert the following after the second paragraph in DCD Subsection 13.6.2:

Non-standard plant vital area and vital equipment information is included in the North Anna Power Station Unit 3 Supplement to US-APWR Design Certification Physical Security Element Review (Reference 13.6-204). Non-standard plant design information is included in the North Anna Power Station Unit 3 Supplement to US-APWR High Assurance Evaluation assessment (Reference 13.6-203). Because these

ENCLOSURE 2

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-13

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-13

(U) Part 8, Physical Security Plan, Section 1.0, Introduction (Page 1): Since Dominion has submitted a combined corporate plan to include operating reactor sites, indicate reference to regulatory requirements set forth in 10 CFR 52.79(a)(35)i, 52.79(a)(36)(i) and (ii) (North Anna Unit 3) in addition to “10 CFR 50.34(c) and (d),” for the COL application.

(U) Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided “shall be complete and accurate in all material respects.” Subpart C of 10 CFR 52 establishes the regulatory requirements for North Anna Unit 3 combined license application. Since this is a corporate security plan, the security plans must meet requirements of 10 CFR 50 and 52 and the reference to the requirements of 10 CFR 50 alone, as stated is not entirely accurate.

Dominion Response

This section is black text in the NEI 03-12 template. Black text is verbatim language from the NRC endorsed NEI 03-12, Revision 6, template. NEI and industry peers have discussed revising the template to include reference to regulatory requirements 10 CFR 52.79(a)(35)i, 52.79(a)(36)(i) and (ii) for the licensees who are pursuing a COL application. This section of the Physical Security Plan will be revised when the NEI 03-12 template is revised.

Proposed COLA Revision

None

ENCLOSURE 3

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-14

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-14

(U) Part 8, Physical Security Plan (PSP), Section 1.1, Facility Physical Layout (page 2): It is not acceptable to only reference the NAPS UFSAR, Early Site Permit (ESP), and Part 2, FSAR, Chapter 2 in this section. Provide clarification on whether Part 2, FSAR, Chapter 2, Site Characteristics, (i.e., Sections 2.1, Geography and Demography, 2.1.1, Site Location and Descriptions, 2.1.2, Exclusion Area Authority and Control, and 2.2, Nearby Industrial, Transportation, and Military Facilities), the ESP and the NAPS UFSAR is applicable in providing additional details of the descriptions and Figures 7, 9, 10, and maps of and drawings in relation to surrounding towns in PSP Section 1.1 for the meeting regulatory requirement of 10 CFR 73, Appendix C, Section II (B)(3)(b), Physical Layout. In addition, provide explanation as to why the detailed information (paragraph 2, from Revision 1) of this section was removed.

(U) Regulatory Basis: Title 10 CFR 73, Appendix C, Section II (B)(3)(b), Physical Layout, requires the safeguards contingency plan to "include a site map depicting the physical structures located on the site, including onsite independent spent fuel storage installations (if applicable), and a description of the structures depicted on the map. Plans must also include a descriptions and map of the site in relation to nearby towns, transportation routes (e.g., rail, water, and roads), pipelines, airports, hazardous material facilities, and pertinent environmental features that may have an effect upon coordination of response activities. Descriptions and maps must indicate main and alternate entry routes for law enforcement or other offsite response and support agencies and the location for marshaling and coordinating response activities.

Dominion Response

The North Anna Unit 3 FSAR (S-COLA Part 2), Chapter 2, Site Characteristics, and the NAPS UFSAR provide additional detailed information that supplements the information provided in PSP Figures 7, 9, and 10. FSAR Chapter 2 also incorporates the ESP Application Site Safety

Analysis Report (SSAR) by reference. The combined documents provide additional information on the site location with a description of the area surrounding the site, as well as geography and nearby industrial and transportation facilities. The references to the FSAR, Part 2, Chapter 2 and the ESP in Section 1.1 of the Physical Security Plan (PSP) will be revised to correct these references to FSAR Chapter 2 and the ESP SSAR. This section will also be expanded to state that North Anna is located in a rural area with no military bases, manufacturing plants, industrial facilities, chemical plants, chemical or other storage facilities, oil and gas pipelines, and major water transportation within 5 miles of the site. The closest railroad line to the site is the main line of the Chesapeake and Ohio Railway, which passes through the towns of Louisa, Mineral, Fredericks Hall, and Bumpass. Its closest approach to the site is about 5.5 miles southwest. A spur line connects the site with this railroad line.

In Revision 1 of the PSP, Paragraph 2 of Section 1.1 provided names of the buildings applicable to the former reactor technology. The information was removed because the information was no longer applicable with the change in technology. In Revision 2 of the PSP, Figure 9 provides the location and names of the structures for North Anna Unit 3.

Proposed COLA Revision

COLA Part 8, The Physical Security Plan, will be revised as described in the response.

ENCLOSURE 4

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-15

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-15

(U) Part 8, Physical Security Plan, Section 4, Establishment of Security Organization (Page 4):
1) Clarify and indicate that the contract services, the security organization contractor, plans to meet and implement all remaining requirements of 10 CFR 73 applicable to a power reactor licensee, in addition to the requirements "10 CFR 73.55(b)(1)(i) through (iv) and (b)4(i)" indicated in Section 4.

(U) Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

The performance and prescriptive requirements for physical protection of power reactors are described in various sections of 10 CFR 73, in addition to requirements stated in 10 CFR 73.55. Clarification is needed to ensure that Dominion contracted service plans to meet and implement all applicable requirements of 10 CFR 73 and not only 10 CFR 73.55.

Dominion Response

As discussed with the NRC in a call on March 9, 2011, the reference in the question above to "10 CFR 73.55(b)(1)(i) through (iv) and (b)4(i)" is not intended as a quotation from the North Anna Unit 3 Physical Security Plan.

North Anna Unit 3 does not intend to use contracted security services. Revision 2 to the Physical Security Plan (PSP) is a fleet plan and includes information relevant to the operating units as well as North Anna Unit 3. The statement about contracted security services is suggested bracketed text from NEI 03-12, Revision 6 template and is included in the PSP to ensure that written contracts are retained as required by the regulations for the operating units that use contracted security services.

To improve readability of the PSP, the next revision of the PSP for the COL application will separate the North Anna units from the remainder of the Dominion operating fleet. The COLA PSP will be developed using NEI 03-12, Revision 6 template and will provide information applicable to North Anna Units 1, 2, and 3 only. Dominion will meet the applicable regulatory requirements.

Proposed COLA Revision

None

ENCLOSURE 5

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-16

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-16

(U) Part 8, Physical Security Plan, Section 4.1, Security Organization Management (Page 4): Delete "Update" in "Updated Final Safety Analysis Report" and delete "U" from "UFSAR."

(U) Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

The facility management organization is outlined in the Updated Final Safety Analysis Report, as titled in the COL application, Part 2. For the purpose the COL application, FSAR is the appropriate and accurate reference to Part 2 of the application. Update to FSAR is performed after licensing and would be identified as "UFSAR".

Dominion Response

Revision 2 to the Physical Security Plan (PSP) is a fleet plan and includes information relevant to the operating units as well as North Anna Unit 3. The "Updated" in "Updated Final Safety Analysis Report" refers to the operating units. In addition, this section is black text in the NEI 03-12 template. Black text is verbatim language from the NRC endorsed NEI 03-12, Revision 6, template. NEI and industry peers have discussed revising the template to include applicable references, such as FSAR, for the licensees who are pursuing a COL application.

To improve readability of the PSP, the next revision of the PSP for the COL application will separate the North Anna units from the remainder of the Dominion operating fleet. The COLA PSP will be developed using NEI 03-12, Revision 6, template and will provide information applicable to North Anna Units 1, 2, and 3 only. Since this section is black text in the template, the reference to FSAR will not be included in the COLA PSP until the NEI 03-12 template is revised as necessary for licensees who are pursuing a COL application.

Proposed COLA Revision

None

ENCLOSURE 6

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-19

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-19

(U) Part 8, Physical Security Plan, Sections 14.4 and 14.5, Vital Area Access Control (Page 24):
1) Clarify "or other types of active alarm system".

(U) Title 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.

(U) Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for additional information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

Dominion Response

The words "or other types of active alarm system" are used to allow flexibility for use of equipment equivalent to the active alarm system specified in this sentence. The other types of active alarm system will meet the requirements of 10 CFR 73.55(e)(9)(ii).

Proposed COLA Revision

None

ENCLOSURE 7

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-20

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-20

(U) Does the addition of the equipment found in the table in Appendix D to the North Anna 3 Supplement to the US-APWR Physical Security Element Review require any additional vital areas to what is shown in Appendix E to the US-APWR Physical Security Element Review rev 3 of the standard plant design? If so, revise the figures in Appendix E to the North Anna 3 Supplement to the US-APWR Physical Security Element Review to clearly identify these areas, also describe and document in section 5 of the North Anna 3 Supplement to the US-APWR High Assurance Evaluation Assessment, locking devices and intrusion detection equipment for vital area portal access and penetrations, consistent with the description provided in Section 5.2.2 of the US-APWR High Assurance Evaluation Assessment rev 2.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for COL include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and maintain at all time such capabilities. Title 10 CFR 73.55(b)(9)(ii) and (iii) requires openings in VA barriers to be alarmed for detection of unauthorized access.

The MHI Technical Report UAP-SGI-08002 technical contains descriptions design and performance requirements of physical protection systems that are described in Part 2, FSAR Chapter 13.6 and may be incorporated by reference.

(U) Note: The information addressing specific details related to security features or providing security functions will be safeguards information (SGI) and should be marked and protected in accordance with 10 CFR 73.21. The applicant should portion mark text in the response to request for additional information (RAI) as appropriate to identify SGI (or Official-Use-Only Security-Related Information) that reveals the specific details of physical protection.

Dominion Response

This is a timing issue between the revisions to DCD Technical Report UAP-SGI-08001, "Physical Security Element Review" (Revision 3, October 2010) and Technical Report UAP-SGI-08002, "High Assurance Evaluation Assessment" (Revision 2, October 2010), the DCD, and the North Anna Unit 3 COLA. The current North Anna COLA (Rev 3, June 2010) incorporated US-APWR DCD Rev 2, which in turn incorporates Rev 2 (Nov 2009) of Technical Report UAP-SGI-08001, "Physical Security Element Review." The next revision of the DCD will adopt Rev 3 (Oct 2010) of Technical Report UAP-SGI-08001, "Physical Security Element Review." After the next revision of the DCD, Dominion will revise its North Anna 3 Supplement to the US-APWR Physical Element Review to address the DCD Rev 3 changes and revise FSAR Section 13.6. Likewise, the North Anna 3 Supplement to the US-APWR High Assurance Evaluation Assessment will be revised after the next revision of the DCD. Dominion will revise the North Anna 3 Supplement to the US-APWR Physical Element Review and the North Anna 3 Supplement to the US-APWR High Assurance Evaluation Assessment with the next COLA revision.

Proposed COLA Revision

None attached to this response. As stated above, a COLA revision will be provided with the next COLA revision submittal.

ENCLOSURE 8

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-21

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-21

(U) Part 8, Physical Security Plan, Section 14.5, Vital Area Access Control (Pages 26-27) and Physical Security Element Review: Physical Security Element Review 1) Clarify whether or not North Anna Unit 3 added vital areas. If so, state that in the addendum to the physical security element review.

2) If North Anna Unit 3 did add vital areas, what changes to the DCD (reactor design) was made to properly protect and monitor the vital areas.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for COL include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and maintain at all time such capabilities. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for COL include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan. Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and maintain at all times such capabilities. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

The DCD, referenced technical report, MHI Technical Report UAP-SGI-08001 identifies vital areas in Appendix E. Appendix E figures appear to identify additional vital areas that are not described in Section 14.5. The vital areas described in the PSP and those described and shown on figures of the DCD referenced MHI Technical Report UAP-SGI-08001 must be consistent.

Dominion Response

North Anna Unit 3 did not add vital areas. Following submittal of the COLA Physical Security Plan (PSP) (Revision 2 June 2010), MHI revised figures in DCD technical report UAP-SGI-08001, "Physical Security Element Review" (Revision 3 October 2010), to clarify standard plant vital areas. Specifically, applicable figures in the DCD technical report were revised to illustrate the spent fuel pool as a separate vital area. Previously, the DCD technical report showed the spent fuel pool enveloped within a larger vital area. The next revision of the DCD will adopt technical report UAP-SGI-08001, "Physical Security Element Review" (Revision 3 October 2010). After the next revision of the DCD, Dominion will revise its North Anna 3 Supplement to the US-APWR Physical Security Element Review to address the DCD Rev 3 changes.

Proposed COLA Revision

None attached to this response. As stated above, a COLA revision will be provided with the next COLA revision submittal.

ENCLOSURE 9

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-23

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-23

(U) Part 8 Physical Security Plan, Section 14.5, Vital Access Controls, (Pages 24-27),

(U) Address how North Anna Unit #3, spent fuel pool, is protected as a vital area.

(U)Regulatory Basis: 10 CFR 73.55(e)(9)(v). At a minimum, the following shall be considered vital areas: (A) The reactor control room; (B) The spent fuel pool; (C) The central alarm station;

Dominion Response

The controls stated under Section 14.5 of the Physical Security Plan are applicable to the spent fuel pool. Following submittal of the COLA Physical Security Plan (PSP) (Revision 2 June 2010), MHI revised figures in DCD technical report UAP-SGI-08001, "Physical Security Element Review" (Revision 3 October 2010), to clarify standard plant vital areas. Specifically, applicable figures in the DCD technical report were revised to illustrate the spent fuel pool as a separate vital area. Previously, the DCD technical report showed the spent fuel pool enveloped within a larger vital area. The next revision of the DCD will adopt technical report UAP-SGI-08001, "Physical Security Element Review" (Revision 3 October 2010). After the next revision of the DCD, Dominion will revise its North Anna 3 Supplement to the US-APWR Physical Security Element Review to address the DCD Rev 3 changes.

Proposed COLA Revision

None attached to this response. As stated above, a COLA revision will be provided with the next COLA revision submittal.

ENCLOSURE 10

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-24

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-24

(U) Part 8 Physical Security Plan, Figure 23. It is shown on Figure 23 the locations of the BREs for North Anna Units 1 and 2. Provide justification for not having the locations of the BREs for North Anna Unit 3.

(U) Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

(U) Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan.

Dominion Response

Physical Security Plan (PSP) Figure 23, North Anna Inner Vehicle Barrier System, initially was a drawing for North Anna Units 1 and 2 to which the Unit 3 outline was added. The BRE locations for Units 1 and 2 were already on the drawing, but are not necessary for the purpose of presenting the Unit 3 information. The BRE locations for Unit 3 have not yet been determined. When the additional BRE locations are determined, the information will be provided in the separate report referenced in the cover letter.

Proposed COLA Revision

None

ENCLOSURE 11

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-25

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-25

(U) Part 8 Physical Security Plan, Section 11.2.1, Protection Against... (Page 9, 1st paragraph, 4th sentence) and Section 8 last paragraph, (pages C-25 thru C-26). Explain why these statements were made in these sections, specifically the last 10 words of the 1st paragraph, 4th sentence of Section 11.2.1, and the last sentence of page C-25.

(U) Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

(U) Title 10 CFR 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for combined license (COL) include how the applicant will meet the requirements of 10 CFR 73 and descriptions of implementation of the physical security plan.

Dominion Response

These statements are in the originally approved operating fleet Physical Security Plan (PSP) dated October 15, 2004. The statements were included to take credit for the protection capability of the barriers consistent with the blast analysis information provided in a letter dated March 31, 2004 from Jason Baird, Ph.D., Lt. Col. USAF, Retired, Research Assistant Professor, Explosives Research Lab regarding Kontek Industries Barrier System.

Proposed COLA Revision

None

ENCLOSURE 12

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-26

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**North Anna Unit 3
Dominion
Docket No. 52-017**

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-26

(U) Part 8 Physical Security Plan, Section 15.5.1, Owner Controlled Area (OCA) Surveillance and Response

(U) It is difficult to determine the site specifics for the proposed North Anna Unit 3 from the operating corporate sites language (e.g. North Anna Units 1 and 2, Millstone, etc.). In order to complete this review for the proposed North Anna Unit 3, separate the corporate sites' language from the proposed language meant to be used for North Anna Unit 3. Make these changes in all appropriate sections of the PSP, T&QP and SCP.

(U) Title 10 CFR 73.55(b)(3)(i) requires applicant to ensure that the capabilities to detect, assess, interdict, and neutralize the DBT and maintain at all time such capabilities. Title 10 CFR 73.55(b)(ii) requires defense-in-depth through integration of engineered and administrative controls for effective physical protection.

(U) Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

Dominion Response

Revision 2 to the Physical Security Plan (PSP) is a fleet plan and includes information relevant to Dominion's operating units as well as North Anna Unit 3. To improve readability of the PSP, the next revision of the PSP for the COL application will separate the North Anna units from the remainder of the Dominion operating fleet. The COLA PSP will provide information applicable to North Anna Units 1, 2, and 3 only.

Proposed COLA Revision

COLA Part 8, The Physical Security Plan, will be revised as described in the response.

ENCLOSURE 13

Response to NRC RAI Letter 55

RAI 5232 Question 13.06-29

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

North Anna Unit 3

Dominion

Docket No. 52-017

RAI NO.: 5232 (RAI Letter 55)

SRP SECTION: 13.06 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/08/2011

QUESTION NO.: 13.06-29

(U) Part 2, Section 13.5.1.2, Preparation of Procedure, Plant Security Procedures (page 13.5-6) and Section 13.6, Security (1st paragraph, Page 13.6-1): Describe the management controls for ensuring "information concerning specific design features and administrative provisions of the security plan" will be protected to limit access to only individuals with "a need-to-know basis." Specifically, describe the requirements for management and administrative controls (e.g., policies, processes, and procedures) that will be established for protection of safeguards information in accordance with requirements of 10 CFR 73.21 during constructions and operations of North Anna Unit 3.

(U) Regulatory Basis: Subpart C of Title 10 CFR (10 CFR) 52, § 52.79(a)(35)(i) and (ii) requires that information submitted for COL include how the applicant will meet the requirements of 10 CFR 73. Security systems and procedures that are considered safeguards information are required to be protected in accordance with requirements of 10 CFR 73.21. Security plans submitted under Part 8 of the COLA did not describe how program will be established to meet requirements of 10 CFR 73.21.

As an applicant, North Anna has established an acceptable management and administrative controls for meeting 10 CFR 73.21 for preparing COL application. However, the COL application did not include plans to apply similar or appropriate management controls required for construction (e.g., information on security systems, features, and hardware design, construction, and installation) and operations phases of North Anna Unit 3.

Dominion Response

As discussed with the NRC in a call on March 9, 2011, the references to Part 2, Section 13.5.1.2 (Page 13.5-6) and Section 13.6 (Page 13.6-1) are not correct for the North Anna 3 FSAR. However, the remainder of the question applies.

Dominion already maintains a procedure that describes the management controls for ensuring information concerning specific design features and administrative provisions of the Physical Security Plan (PSP) are protected against unauthorized disclosure. This procedure ensures protection against unauthorized disclosure which meets the requirements of 10 CFR 73.21 and limits access to only individuals with "a need to know" in accordance with the requirements of 10 CFR 73.22. Dominion personnel will continue to implement and maintain this procedure for the control of safeguards information during the construction and operation of North Anna Unit 3.

Proposed COLA Revision

None