

CCNPP3COLA NPEmails

From: Canova, Michael
Sent: Thursday, September 08, 2011 1:53 PM
To: 'Infanger, Paul'
Cc: Arora, Surinder; CCNPP3COL Resource
Subject: Predecisional - Draft Calvert Cliffs RCOLA Security Audit Plan 08-30-11.doc
Attachments: Draft Calvert Cliffs RCOLA Security Audit Plan 09-06-11 - Rev 1.doc

The attached document is being forwarded in its predecisional draft form to allow UNE to determine their supporting participants for audit scheduling purposes. The final plan will be forwarded at a future time.

Mike Canova

Project Manager
EPR Branch
Division of New Reactor Licensing
Office of New Reactors
301-415-0737

From: Miernicki, Michael
Sent: Thursday, September 08, 2011 1:25 PM
To: Canova, Michael
Cc: Arora, Surinder
Subject: Calvert Cliffs RCOLA Security Audit Plan 08-30-11 Rev 0 (2) wth JS comments.doc

Mike, please forward the attached draft audit plan to UNE. UNE needed to see this draft audit plan in order to determine their participants for audit scheduling purposes. We are proposing a 2-day audit during the week of 9/26 at the UNE/ Excel offices in Rockville. Ask UNE to propose which dates during this week they have personnel available to conduct the audit.

Mike

Michael J. Miernicki
Sr. Project Manager
NRC/NRO/DNRL/NARP
301-415-2304

Hearing Identifier: CalvertCliffs_Unit3Cola_NonPublic_EX
Email Number: 6515

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Subject: Predecisional - Draft Calvert Cliffs RCOLA Security Audit Plan 08-30-11.doc
Sent Date: 9/8/2011 1:52:49 PM
Received Date: 9/8/2011 1:52:50 PM
From: Canova, Michael

Created By: Michael.Canova@nrc.gov

Recipients:

"Arora, Surinder" <Surinder.Arora@nrc.gov>
Tracking Status: None
"CCNPP3COL Resource" <CCNPP3COL.Resource@nrc.gov>
Tracking Status: None
"Infanger, Paul" <paul.infanger@unistarnuclear.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

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|---|-------------|------------------------|-------|
| MESSAGE | 1053 | 9/8/2011 1:52:50 PM | |
| Draft Calvert Cliffs RCOLA Security Audit Plan 09-06-11 - Rev 1.doc | | | 49146 |

Options

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

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CALVERT CLIFFS UNIT 3 COL APPLICATION UniStar Nuclear Energy Docket No. 52-016

PHYSICAL SECURITY AUDIT PLAN

Location: **TBD:** Excel Services Corporation
11921 Rockville Pike, Suite 100, Rockville, Maryland 20852

Purpose:

The purpose of this licensing security audit is to examine and evaluate supporting technical information on selected topics of the UniStar Nuclear Energy (UniStar) plan for design of a physical protection system to protect the Calvert Cliffs Nuclear Power Plant Unit 3 (CCNPPU3) combined license (COL) application under Docket No. 52-016. The outcome of the audit may result in identification of additional information or documentation that will require docketing to support NRC findings on high assurance of adequate protection and regulatory decisions.

Background

Ongoing NRC staff review of the applicant's docketed information has resulted in identification of an open item related to complete and accurate descriptions related to the technical bases, assumptions, and results subject areas of the audit. Specifically, additional information is needed to further address what must be protected in order to prevent radiological sabotage. Additional information will assist the NRC in determining how the applicant meets performance and regulatory requirements and allows NRC staff to develop informed security findings. The docketed information on the subject of the audit scope requires additional focus for the NRC staff in preparation of supplemental Requests for Additional Information (RAIs) and/or closure/resolutions of open items.

Regulatory Audit Bases:

Subpart B of Title 10 Code of *Federal Regulations* (10 CFR) Part 52, Section 79 (52.79), requires that information submitted for a Combined Operating License Application (COLA) must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement specifications and construction and installation specifications by an applicant. Title 10 CFR 52.79(a)(35) requires a COLA to contain a physical security plan describing how the applicant will meet the requirements of 10 CFR Part 73. The performance requirements of 10 CFR 73.55(b) requires a licensee (applicant) to provide high assurance of protection against the Design Basis Threat (DBT) of radiological sabotage.

The audit is required to identify technical information needed to address the integration of the design and licensing bases for physical protection systems and security programs within the scope of the COLA. The information on the docket includes Part 2 of the application, the Final Safety Analysis Report (FSAR) and referenced technical report, the Calvert Cliffs Nuclear Power Plant Unit 3 Security Assessment (Revision 6) submitted by letter dated July 29, 2011, Part 8 (Security Plans), and information incorporated by reference to the U.S. EPR design certification document for meeting performance and prescriptive requirements of 10 CFR 73.

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The docketed information that contains safeguards and security-related information are withheld from public disclosure in accordance with 10 CFR 2.390.

Regulatory Audit Scope:

This licensing security audit is a follow-up of a subject audit conducted on June 28-30, 2010, at Lusby, Maryland, based on new information provided on the docket (i.e., submitted on July 29, 2011 as a result of response to staff RAI No. 727, Question No. 13.06.01-19).

The scope for the audit will focus on the descriptions and representations contained in the CCNPPU3 Security Assessment, Section 6.1, "Target Set Analysis," and Appendix G of Technical Report (TR), CCNPPU3 Security Assessment, Revision 6, along with information referenced in Appendix F of ANP-10925, and review of supporting documentations providing the technical basis for the summary of results and information provided in Table G-1, including locations of equipment relied for operator actions credited. The topics of discussion will include but are not limited to: Modular Accident Analysis Program runs, comparison of Target Sets to the MAAP results, adversary capabilities; interpreting target sets; process for identifying target set groups, cable trays and conduit information, , and cited information incorporated by reference.

Types of Supporting Documents Requested for Review at the Audit:

NRC staff requests UniStar to provide an overview of the topics described above as they relate to identification of complete and accurate target sets protected by the security envelope proposed for the CCNPPU3 Plant. The NRC staff requests that UniStar provide all documentation supporting the discussions and results presented in the Calvert Cliffs Nuclear Power Plant Unit 3 Security Assessment, Revision 6, in the examination and evaluation of the topic indicated above. The referenced and supporting documents needed for the audit should include those supporting the information described and presented in the following sections of the TR: Section 6.1, Target Set Analysis, Appendix G, Target Sets (subsections G.1 through G.3), Table G-1, Target Set Equipment/System Combinations, Tables, Target Sets, Pages G-9 through G-13, and AREVA TR ANP-10295, U.S. EPR Security Design Features, Appendix F and Appendix C (reference 27 latest).

Audit Team:

- Surinder Arora, NRC Project Manager (Audit Team Lead)
- Mike Miernicki, NRC Project Manager
- Pete Lee, NRC, Technical Reviewer
- Richard Costa, NRC, Technical Reviewer (Bell Bend COLA)
- Mike Buckley, NRC, Reactor Risk Analyst
- Bruce Mrowca, NRC Contractor (ISL)
- Chris Chwasz, NRC Contractor (ISL)

No quality assurance (DCIP) support is required for this audit. Any materials deemed to be suitable for submittal or citation will be identified for future quality assurance program audit activities.

Logistics

The audit will be conducted at Rockville, Maryland. The audit is scheduled to begin at 9:00 a.m.

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September _____, 2011 and end at 5:00 p.m. on September _____, 2011. Participating individuals will meet at the audit location.

Special Requests

Appropriate handling and protection of Safeguards Information (SGI) shall be acknowledged and implemented throughout the audit.

Deliverables

An audit report will be generated after completion of the audit. The audit outcome will be used to identify information not currently addressed on the docket and the submittal of additional information for making security findings and regulatory decisions. The audit will inform the NRC staff preparation and issuance of any supplemental RAIs for the CCNPP Unit 3 technical review based on currently docketed information (e.g., Parts 2, 7, and 8, and referenced technical report) for demonstration of a high assurance of adequate protection supporting the requested combined license for CCNPP Unit 3. The audit will assist the NRC staff in the preparation and issuance of appropriate supplemental RAI for clarification of documented information for resolution of open items for the licensing review.