

PMNorthAnna3COLPEmails Resource

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Sent: Thursday, October 20, 2011 4:00 PM
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Cc: Weisman, Robert; NorthAnna3COL Resource; Johnson, Judy; Takacs, Michael
Subject: Draft RAI 6008, FSAR Section 13.6, North Anna 3 COLA
Attachments: Draft RAI 6008.doc

Hi All,

Please see attached draft RAI 6008 (Section 13.6) for North Anna 3 COLA. I would like to request Dominion to let me know if it needs any clarification on this RAI before COB October 25, 2011. Otherwise, it will be issued as final after October 25, 2011. For other people, it is for information only.

Thanks,
Chandu Patel

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Request for Additional Information No. 6008 (Draft)
North Anna, Unit 3
Dominion
Docket No. 52-017
SRP Section: 13.06.01 - Physical Security - Combined License
Application Section: 13.6 - Physical Security

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

13.06.01-***

Physical Security Plan, page 1, section 1.1. List all site structures, (e.g. ISFSI etc.)
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.

13.06.01-***

Physical Security Plan, page 2, section 2, second sentence from the bottom. Justify the added language "or equivalent measure that meet the same high assurance objectives provided by paragraphs (a) through (r)".
Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

13.06.01-***

Physical Security Plan, page 8, section 11.2.1, third sentence. The system description is inconsistent with the description stated in section 11.1. Clarify the statement about OCA barriers.
Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

13.06.01-***

Physical Security Plan, page 10, section 11.3. Clarify whether or not North Anna Power Station has a SSACB.
Regulatory Basis: Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

13.06.01-***

Physical Security Plan, page 15, section 14.4.1, Vehicle Type table. Clarify/justify the intent of setting a PA vehicle search criteria (minimum explosive weight) in excess of that discussed in RG 5.69 for hand-carried explosive amounts. The explosive amounts discussed in RG 5.69 are intended to provide a standard for use by licensees when performing site-specific analyses and/or force-on-force testing, and are not applicable to PA vehicle search criteria. 10 CFR 73.55(h)(1) requires all personnel, vehicles, and materials to the search process prior to granting access to the PA to detect, deter, and prevent the introduction of firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage. The establishment of a minimum explosive amount for PA vehicle searches is contrary to 10 CFR 73.55(h)(1). Please provide additional clarification and justification for this search criterion.

Regulatory Basis: 10 CFR 73.55(h)(1). The objective of the search program is to detect, deter, and prevent the introduction of firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage.

13.06.01-***

Physical Security Plan, page 19, section 14.4.6. Clarify if the sentence that contains "The applicable site at which access is being requested" is corporate language or language that pertains only to North Anna Power Station. If corporate language, clarify the statement for this COL application.

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

13.06.01-***

T&QP pages B-18 and B-19, Tasks 20, 27 and 28. In the Dominion response to letter dated August 14, 2009, RAI 5232, Question 13.06-1 Dominion committed to revising the Appendix B, Table 1 Critical task Matrix by placing an "X" in the appropriate boxes for Armed Security Officer qualifications in a future submission of the North Anna Unit 3 COLA. The revised Revision 3 physical security plan dated June 2011 does not have the above tasks marked. When does Dominion propose to update these Critical Tasks?

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.

13.06.01-***

North Anna Power Station Unit 3, Supplement to US-APWR High Assurance Evaluation Assessment, Revision 0, dated April 2010: 1) Provide clarification as to if the North Anna Power Station Unit 3, "Supplement to US-APWR High Assurance Evaluation Assessment," Revision 0, dated April 2010 is still applicable or has it been replaced in its entirety by the North Anna Power Station Unit 3, "Physical Security Protection System Report," Revision 1, dated July 2011?

2) If the "Supplement to US-APWR High Assurance Evaluation Assessment," Revision 0, is still applicable, then the following statement that is utilized in multiple locations throughout the report needs to be clarified: "No supplemental information. This section of

the High Assurance Evaluation is not part of the certification and is not incorporated by reference into the FSAR.”

3) If the “Supplement to US-APWR High Assurance Evaluation Assessment,” Revision 0, has been replaced in its entirety by the North Anna Power Station Unit 3, “Physical Security Protection System Report,” Revision 1, is Figure 1, “MSSD Boundary for the North Anna Unit 3,” from the “Supplement to US-APWR High Assurance Evaluation Assessment” going to be included in the next revision of the “Physical Security Protection System Report?”

Regulatory Basis: 10 CFR 73.55 (c), Security Plans, states that the Licensee security plans must describe the site-specific conditions that affect how the licensee implements Commission requirements. In addition, Title 10 CFR 73.55(b)(3) requires the applicant design the physical protection program to prevent significant core damage and spent fuel sabotage with assurance of the capabilities to detect, assess, interdict, and neutralize the DBT, and maintain at all times such capabilities with defense-in-depth. Title 10 CFR 73.55(b)(4) requires the applicant to analyze and identify site specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of 10 CFR 73 and account for conditions in the design of the physical protection program. Complete and accurate information (i.e., descriptions) is needed for the staff to perform its review.

13.06.01-***

The following is a supplemental Question for RAI 5232, Question No. 13.06.01-33 for closure and development of an SE with O/I:

Regarding TR UAP-SGI-08002, Revision 2 Section 4.0 discussions and Table 4.1 and discussions in the PPSR, Sections 3.0 through 3.3 to include Target Set Groups that were not selected based on application of criteria greater than 8-hours as a threshold for eliminating sequences of events leading to core damage and loss of SFP cooling. The inclusion of all Target Set Groups currently identified as “not selected” in Section 4 discussions including Table 4-1 of UAP-SGI-08002, Revision 2 would provide an accurate and complete target sets acceptable for what must be protected for the USAPWR standard design for radiological sabotage.

Regulatory Basis: Subpart C of Title 10 CFR Part 52, § 52.79(a)(35)(i), (ii), and (iv) requires that the Combined license (COL) applicant submit information in the COL application that discusses how the applicant will meet the requirements of 10 CFR 73. Title 10 CFR 73.55(b)(3) requires the applicant design the physical protection program to prevent significant core damage and spent fuel sabotage with assurance of the capabilities to detect, assess, interdict, and neutralize the DBT, and maintain at all times such capabilities with defense-in-depth. Title 10 CFR 73.55(b)(4) requires the applicant to analyze and identify site specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of 10 CFR 73 and account for conditions in the design of the physical protection program. Target sets must be sufficiently complete and accurate and describe what must be protected for meeting performance requirements of Title 10 CFR 73.55(b)(3). Deletion of TSG identified based on time constraints is contrary to regulatory requirements and does not conform to guidance provided RG 5.81. Based on review of RAI response, including the revised PPSR and TR UAP-SGI-08002, Revision 2, High Assurance Evaluation Assessment, that is incorporated by reference, the supplemental questions to RAI previously issued is required to achieve full closure and development of an SE with no Open Item.

The supplemental follow-up question above relates to RAI Question No. 13.06.01-33 (RAI No. 5232), that requested the following:

- a. (U) Provide the technical bases for applying the criteria of greater than 8-hours as a threshold for core damage or the loss of spent fuel pool cooling in selecting TSG identified in the PSPSR Sections 3.0 through 3.3 and UAP-SGI-08002, Revision 2, Table 4.1. Justify how both the PSPSR and the referenced technical report meets the requirement of 10 CFR 73.55(b)(3) that the physical protection program must be designed to prevent significant core damage and spent fuel sabotage. This regulation does not establish constraints based on duration to core damage and excluded TSG, which would be unprotected to prevent the adversary capabilities of the design basis threat (DBT) to initiate the sequence of events for radiological sabotage.

Regarding TR UAP-SGI-08002, Revision 2 and discussions in the PSPSR, Sections 3.0 through 3.3, it may be retained to describe the possible capabilities of recovering or possible outcome as from a DBT event (i.e., defense-in-depth). The applicant's licensing basis described in the COLA does not address the capabilities of required engineered, administrative, and management controls, including training and pre-planning, to support the assumption of "regain[ing] control of the plant after a security event," within a time frame (i.e., 8 hrs) . Specifically, the plans and strategy described do not describe how engineered and administrative controls and management measures, including the assurance of the reliability and availability of offsite law enforcement agencies and licensee's personnel and equipment, provide the response capabilities necessary to support the assumption stated.

13.06.01-***

Physical Security Plan, Revision 3, (North Anna Station Units 1 and 2, and 3 Combined Operating License Application (COLA) Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan) Section 18, details the minimum number of armed responders continuously in the protected area and the minimum number of armed responders who are available onsite to implement the protective strategy.

Provide a detailed metric of your staffing conclusion whereby you compared the minimum number of armed responders as described in Section 18 of the PSP with the actions and/or protective strategies described in the North Anna Power Station Unit 3 Physical Security Protection Systems Report, Revision 1, the US-APWR High Assurance Evaluation Assessment (UAP-SGI-08002), Revision 2 and the protective strategies needed to support North Anna Units 1 and 2. Include in your staffing matrix, the armed responders located in the BREs/BBREs.

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.