

PMNorthAnna3COLPEmails Resource

From: Takacs, Michael
Sent: Monday, April 02, 2012 1:42 PM
To: Wanda D Craft
Cc: NorthAnna3COL Resource; Patel, Chandu; Petrucelli, Judy; Frost, John
Subject: RE: clarification call for RAI 6282
Attachments: DRAFT RAI 6282 responses.pdf

Good Afternoon Wanda,

Unfortunately, the lead reviewer is out of the office until Tuesday April 10th, 2012. I'll check with the staff to see if April 11th or 12th are doable and get back to you.

Thanks

Mike Takacs
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Office of New Reactors
U.S. Nuclear Regulatory Commission
(301) 415-7871

From: Wanda D Craft [<mailto:wanda.d.craft@dom.com>]
Sent: Thursday, March 29, 2012 1:28 PM
To: Takacs, Michael
Subject: clarification call for RAI 6282

Mike,
Attached are draft responses to RAI 6282. Thanks for setting up a call. Monday at 1pm or 3pm works for us, but we can wait for later in the week or the next week if that works better for you. If you have any questions, please call me.

Wanda D. Craft
Nuclear Licensing and Operations Support
Dominion Resources Services, Inc
(804) 273-4687
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Subject: RE: clarification call for RAI 6282
Sent Date: 4/2/2012 1:42:13 PM
Received Date: 4/2/2012 1:42:14 PM
From: Takacs, Michael

Created By: Michael.Takacs@nrc.gov

Recipients:

"NorthAnna3COL Resource" <NorthAnna3COL.Resource@nrc.gov>
Tracking Status: None
"Patel, Chandu" <Chandu.Patel@nrc.gov>
Tracking Status: None
"Petrucelli, Judy" <Judy.Petrucelli@nrc.gov>
Tracking Status: None
"Frost, John" <John.Frost@nrc.gov>
Tracking Status: None
"Wanda D Craft" <wanda.d.craft@dom.com>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

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Options

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SAFEGUARDS INFORMATION

Serial No. NA3-12-006R
SRP 13.06.01: Response to RAI Letter No. 95

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

North Anna Unit 3

Dominion

Docket No. 52-017

RAI NO.: 6282 (RAI Letter 95)

SRP SECTION: 13.06.01 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/16/2012

QUESTION NO.: 13.06.01-60

Physical Security Plan (PSP), Revision 3, Section 18: In the response to RAI 6008, question No. 13.06.01-59,

1) the spelled out number of positions that is stated do not align with the number shown on the provided table common to the site. Provide a revised response to correct the editorial error.

2) In reviewing the applicant's response to RAI 6008 question No. 13.06.01-59, the provided table (Enclosure 2 of transmittal) appears to be in alignment with Section 4.3, "Implementation of the NAPS Unit 3 Protective Strategy," of the PSPSR (Revision 1). However, the total number of X personnel identified in Section 18 of the PSP does not appear to be consistent with the response to the RAI.

One of the tables provided with the RAI response define "Site security response personnel other than X's and Y's (Common to the site)." In that section, it identifies the personnel at the Access Control Station as not being included in the X's or Y's. However, when the X value is provided in the PSP, the PSP states that the X value includes the protected area access control point.

Provide clarification as to the total number of X personnel as well as their originating pre-event responsibilities.

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

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UPON SEPARATION OF ENCLOSURES 4 AND 5, THIS ENCLOSURE IS DECONTROLLED.

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SAFEGUARDS INFORMATION

Serial No. NA3-12-006R
SRP 13.06.01: Response to RAI Letter No. 95

responsibilities that could interfere with their assigned response duties. Title 10 CFR 52.6, Completeness and accuracy of information, requires information provided "shall be complete and accurate in all material respects."

Dominion Response

1) The response to RAI Q13.06.01-59 states "There are four positions that are common to Units 1 and 2, and Unit 3, which are shown in the table in Enclosure 2 as Site security response personnel other than X's and Y's." As discussed during the clarification call on February 9, 2012, these four positions refer to the positions listed in the table, Central Alarm Station, Secondary Alarm Station, Security Shift Supervisor, and Access Control Station. There is more than one location for the position of Access Control Station so the staffing number for that position is also more than one. Because two Access Control Stations may be active, the table in Enclosure 2 shows a total of five personnel for these four positions. The number of positions (four) refers to the title of the positions rather than the number of personnel staffing those positions. The response does not contain an editorial error.

2) The total number of X personnel provided in the COLA PSP is accurate and consistent with the number provided in the response to RAI Q13.06.01-59. As identified in the table in the response to RAI Q13.06.01-59, the response personnel manning the access control station are not included in the X and Y numbers.

Section 18 of the COLA PSP is template language. As discussed during the clarification call on February 9, the parenthetical phrase in Section 18, "(including the protected area access control point)," refers to the access control point as a location which is acceptable for an X position. Refer to NEI's Security Frequently Asked Questions (SFAQ) 09-05 "Location of Armed Responders" for a discussion of this part of Section 18. Locations for response personnel are not designated in the COLA PSP. North Anna has elected to not position an X at the access control point. The X value provided in the COLA PSP does not include the person manning the protected area access control station.

The total number of X personnel as well as their originating pre-event locations were provided in the table in Enclosure 2 to the response to RAI Q13.06.01-59. The X personnel have no pre-event responsibilities that would interfere with their ability to respond to an event within their response timeline.

Proposed COLA Revision

None

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RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

North Anna Unit 3

Dominion

Docket No. 52-017

RAI NO.: 6282 (RAI Letter 95)

SRP SECTION: 13.06.01 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/16/2012

QUESTION NO.: 13.06.01-61

Physical Security Plan (PSP) Revision 3, section 11.3 and PSPSR Revision 1, Figure 1: In RAI 13.06.01-55, the NRC asked Dominion to clarify whether or not North Anna Power Station has a SSACB.

In its response, Dominion clarified that the North Anna Power Station does have a SSACB, however, in the COLA PSP, Revision 3, the security access buildings are called by their names, the Security Access Control Building and Southeast Security Building, rather than by the titles of SACB and SSACB.

There is an inconsistency between what is written in section 11.3, and section 2.6 of the North Anna PSPSR and the provided Figures.

Provide the title with the depictions of the Southeast Security Building and the Unit 3 Vehicle Access Building on Figures 3, 6 and 7 of the North Anna PSP. In addition, provide a clearly labeled drawing for Figure 1 of the North Anna's PSPSR Revision 1.

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

Dominion Response

As discussed during the clarification call on February 9, 2012, Figures 3, 6, and 7 of the COLA PSP and Figure 1 of the Physical Security Protection Systems Report (PSPSR) will be revised to consistently identify the SACBs and the SSACB for North Anna Unit 3.

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Also discussed during the clarification call, the reference to Figure 1 in Section 2.6.1 of the PSPSR, "Protected Area Access Controls," will be removed. The PSPSR was created to provide detailed information not included in the COLA PSP. Since figures in the COLA PSP provide the details of access points along the PA, the reference to Figure 1 in Section 2.6.1 of the PSPSR is not needed.

Also discussed during the clarification call, PSPSR Figure 1 provides the general layout of the Vehicle Barrier System. PSPSR Figure 1 contains security-related information and is requested to be withheld in accordance with 10 CFR 2.390. An enlarged copy of the revised PSPSR Figure 1 is provided in Enclosure 5.

Proposed COLA Revision

The COLA PSP Figures 3, 6, and 7 will be revised as shown in Enclosure 4. The PSPSR will be revised as described in the response.

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Serial No. NA3-11-006R
SRP 13.06.01: Response to RAI Letter No. 89

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

North Anna Unit 3

Dominion

Docket No. 52-017

RAI NO.: 6282 (RAI Letter 95)

SRP SECTION: 13.06.01 – PHYSICAL SECURITY

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

DATE OF RAI ISSUE: 02/16/2012

QUESTION NO.: 13.06.01-62

Physical Security Plan (PSP) Revision 3, Figures 3 and 6: In the North Anna Units 1 and 2 PSP Revision 13, Figures 9 and 22 show rail spurs on the site drawings.

In Figures 3 and 6 of the North Anna Units 1, 2 and 3 PSP Revision 3, the rail spurs appear to be removed.

There is an inconsistency in what is described in the Units 1, 2 and 3 PSP Sections 1.1, Facility Layout, 4.2 Physical Layout, 11.3 Protected Area Barriers (last paragraph), and in Section 2.4.1, Outer Vehicle Barrier System of North Anna's PPSR. Provide justification for the removal of the railroad spurs on the drawings.

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

Dominion Response

As discussed in the clarification call on February 9, 2012, Figure 6 of the COLA PSP will be revised to add the rail spur at its intersection with the outer vehicle barrier. No revision is needed to Figure 3 since the outer vehicle barrier is not shown.

Proposed COLA Revision

The COLA PSP Figure 6 will be revised as described in the response and shown in Enclosure 4.

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