

## NorthAnnaRAIsPEm Resource

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**From:** Patel, Chandu  
**Sent:** Tuesday, July 03, 2012 9:43 AM  
**To:** 'na3raidommailbox@dom.com'  
**Cc:** NorthAnnaRAIsPEm Resource; Weisman, Robert; Galvin, Dennis; Petrucelli, Judy  
**Subject:** Draft RAI 6568, FSAR Section 14.3.12, North Anna 3 COLA  
**Attachments:** Draft RAI 6568.doc

Hi All,

Please see attached draft RAI 6568 (Section 14.312), 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 July 9, 2012. Otherwise, it will be issued as final after July 9, 2012. For other people, it is for information only.

Thanks,  
Chandu Patel, Lead Project Manager  
North Anna 3 COLA

**Hearing Identifier:** NorthAnna3\_eRAI  
**Email Number:** 37

**Mail Envelope Properties** (8C658E9029C91D4D90C6960EF59FC0D68CD27DE577)

**Subject:** Draft RAI 6568, FSAR Section 14.3.12, North Anna 3 COLA  
**Sent Date:** 7/3/2012 9:42:44 AM  
**Received Date:** 7/3/2012 9:42:45 AM  
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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	411	7/3/2012 9:42:45 AM
Draft RAI 6568.doc	32250	

**Options**

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

Request for Additional Information No. 6568 (Draft)  
North Anna, Unit 3  
Dominion  
Docket No. 52-017

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

Application Section: NUREG-0800

QUESTIONS for Advanced Reactor Branch 1 (ARB1)

14.03.12-\*\*\*

(U) Part 10, "ITAAC and Proposed License Conditions, Appendix C, Physical Security Hardware" and Part 2, FSAR Chapter 14, Section 14.3.4.12, "ITAAC for Physical Security Hardware" in regards to NAPS COL 14.3(3):

(U) 1) Provide Test Abstracts for the North Anna Unit 3 Physical Security Hardware ITAAC that support the site specific physical security inspections, tests, analyses, and acceptance criteria (ITAAC) identified in Appendix C.

(U) 2) With provision of the Test Abstracts, appropriate changes to the North Anna 3 Part 2 FSAR, NAPS COL 14.3(3) should be made to remove the last sentence that states "Physical security ITAAC test abstracts supporting the site-specific physical security ITAAC are available for review and inspection prior to implementation."

(U) 3) The provided test abstract may be similar to descriptions submitted by the R-COLA in letter dated December 9, 2010. Update the appropriate sections of the North Anna Unit 3 COL application (e.g., Part 10, Appendix C, 'Physical Security Hardware') to clearly describe or incorporate the test abstracts.

(U) Regulatory Basis: Subpart C, Title 10 CFR 52.80(a). "The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria 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."

(U) The COL Information Item 14.3(3) of the standard US-APWR requires that the COL applicant identify site specific physical security hardware ITAAC. The test abstracts provide the information necessary for verification of key designs, performance, 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. This provides adequate information for staff to determine reasonable assurance as required in the regulations.

(U) The statement provided in "ITAAC for Physical Security Hardware" NAPS COL 14.3(3) refers to a future action that does not provide the information needed for determination of reasonable assurance.

(U) Lastly, the statement does not meet the COL action stated in the US-APWR Design Control Document, section 14.3.4.12 "ITAAC for Physical Security Hardware" and section 14.3.6 "Combined License Information" COL 14.3(3) Revision 3. These sections state, "The COL Applicant provides ITAAC for the facility's physical security hardware not addressed in the DCD, in accordance with RG 1.206 (Reference 14.3-1) as appropriate, and provides abstracts describing the specific inspections, tests, and analysis for the facility's physical security hardware ITAAC not addressed in the DCD".