

From: Hughey, John
Sent: Friday, October 05, 2012 10:27 AM
To: Hughey, John; 'michelle.patti@pseg.com'
Cc: 'Duke, Paul R.'; Khanna, Meena
Subject: Clarifying Information for Question No. 4 (with attachment)
Attachments: Salem and Hope Creek Generating Stations - Request for Additional Information Regarding August 1, 2012, Security Plan Submittal

Michelle,

As discussed on yesterday's teleconference call, NSIR has provided clarifying information below regarding Question #4 in the attached RAI request. Please contact me at 301-415-3204, or by reply e-mail, to discuss the need for an additional teleconference and the originally requested response due date of October 19, 2012.

Thank you,
John

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Clarifying Information for Question No. 4

In section 15.3 of the PSP, the licensee describes intrusion detection equipment at the site. The last paragraph of this section includes a description of an early warning system (EWS). Describe how the EWS barrier and associated intrusion detection and assessment equipment that are identified in Section 15.3 of the PSP meets the requirements of 10 CFR 73.55. Specifically:

- a. Describe the function of the EWS barrier by identifying how it and the associated intrusion detection and assessment capabilities are integrated within the physical protection program and protective strategy and how these capabilities are used to support the initiation of the protective strategy. Describe how the detection and assessment capability at the EWS barrier facilitates the initiation of operator actions that are credited as target elements within target sets. Describe how the implementation of the EWS barrier and associated intrusion detection and assessment equipment have been included in the drills and exercises of the site's protective strategy that have been conducted to meet the Performance Evaluation Program requirements of 10 CFR Part 73, Appendix B VI, C.3. Describe the percentage of drills and exercises, conducted since implementation of the EWS barrier and associated intrusion detection and assessment equipment, in which initiation of the protective strategy resulted from adversary detection at the EWS barrier.

Regulatory Basis:

Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(e)(1)(ii), the licensee shall describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

- b. Describe how the openings in the EWS barrier are secured and monitored to prevent exploitation of the openings.

Regulatory Basis:

In accordance with 10 CFR 73.55(e)(4), consistent with the stated function to be performed, openings in any barrier or barrier system established to meet the requirements of this section must be secured and monitored to prevent exploitation of the opening.

- c. Describe how vehicle and material access through the EWS barrier is controlled.

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Regulatory Basis:

In accordance with 10 CFR 73.55(g)(1), consistent with the function of each barrier or barrier system, the licensee shall control personnel, vehicle, and material access, as applicable, at each access control point in accordance with the physical protection program design requirements of 10 CFR 73.55, and 10 CFR 73.55(b).

- d. Describe the personnel, vehicle and material access control portals of the EWS barrier, specifically whether they are located outside of, or co-located with, the EWS barrier.

Regulatory Basis:

Consistent with 10 CFR 73.55(g)(1)(i)(A), access control portals must be located outside of, or concurrent with, the physical barrier system through which it controls access.

- e. Describe how the locking devices, intrusion detection equipment, and surveillance equipment implemented at the EWS personnel, vehicle, and material access control portals meet regulatory requirements.

Regulatory Basis:

Consistent with 10 CFR 73.55(g)(1)(i)(B), access control portals must be equipped with locking devices, intrusion detection equipment, and surveillance equipment consistent with the intended function.

- f. Describe the search procedures that have been implemented at EWS access control portals. _

Regulatory Basis:

Consistent with 10 CFR 73.55(h)(2)(i), where the licensee has established physical barriers in the owner controlled area, the licensee shall implement search procedures for access control points in the barrier.

- g. Describe how the intrusion detection and assessment equipment at the EWS provides, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the protective strategy.

Regulatory Basis:

Consistent with 10 CFR 73.55(i)(1), the licensee shall establish and maintain intrusion detection and assessment systems that satisfy the design requirements of 10 CFR 73.55(b) and provide, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the licensee's protective strategy.

- h. Describe how the intrusion detection and assessment equipment at the EWS is designed to annunciate and display concurrently in two continuously staffed onsite alarm stations.

Regulatory Basis:

Consistent with 10 CFR 73.55(i)(2), intrusion detection equipment must annunciate and assessment equipment shall display concurrently, in at least two continuously staffed onsite alarm stations, at least one of which must be protected in accordance with the requirements of the central alarm station within this section.

- i. Describe how the EWS intrusion detection and assessment systems are designed to: 1) provide visual and audible annunciation of an alarm; 2) provide a visual display from which assessment of the detected activity can be made; 3) ensure that the annunciation of an alarm indicates the type and location of the alarm; 4) ensure that alarm devices to include transmission lines to annunciators are tamper indicating and self-checking; 5) provide an automatic indication when the alarm system or a component of the alarm system fails, or when the system is operating on the back-up power supply; and 6) support the initiation of a timely response in accordance with the security plans, protective strategy, and associated implementing procedures.

Regulatory Basis:

Consistent with 10 CFR 73.55(i)(3)(i) through (i)(3)(vi), the licensee's intrusion detection and assessment systems must be designed to: (i) provide visual and audible annunciation of the alarm; (ii) provide a visual display from which assessment of the detected activity can be made; (iii) ensure that annunciation of an alarm indicates the type and location of the alarm; (iv) ensure that alarm devices to include transmission lines to annunciators are tamper indicating and self-checking; (v) provide an automatic indication when the alarm system or a component of the alarm system fails, or when the system is operating on the back-up power supply; and (vi) support the initiation of a timely response in accordance with the security plans, protective strategy, and associated implementing procedures.

- j. Describe how unattended openings that intersect the EWS barrier have been addressed to detect exploitation by surreptitious bypass.

Regulatory Basis:

Consistent with 10 CFR 73.55(i)(5)(iii), unattended openings that intersect a security boundary such as underground pathways must be protected by a physical barrier and monitored by intrusion detection equipment or observed by security personnel at a frequency sufficient to detect exploitation.

- k. Describe the type of illumination assets that are implemented to ensure the area of the EWS is provided with the illumination necessary to satisfy the design requirements of 10 CFR 73.55(b) and implement the protective strategy.

Regulatory Basis:

Consistent with 10 CFR 73.55(i)(6)(i), the licensee shall ensure that all areas of the facility are provided with illumination necessary to satisfy the design requirements of 10 CFR 73.55(b) and implement the protective strategy.

- l. Describe how the implementation of the EWS barrier and associated intrusion detection and assessment equipment is included in security program reviews.

Regulatory Basis:

Consistent with 10 CFR 73.55(m)(1), as a minimum the licensee shall review each element of the physical protection program at least every 24 months.

- m. Describe how the EWS barrier and associated intrusion detection and assessment equipment is included in the site maintenance, testing, and calibration program and the intervals that the security equipment (intrusion detection and assessment, access control, and if applicable search equipment) at the EWS are tested for operability and performance.

Regulatory Basis:

Consistent with 10 CFR 73.55(n)(1)(i), the licensee shall establish, maintain, and implement a maintenance, testing and calibration program to ensure that security systems and equipment, including secondary power supplies and uninterruptible power supplies, are tested for operability and performance at predetermined intervals, maintained in an operable condition, and are capable of performing their intended function.

- n. Describe the compensatory measures that are implemented when the EWS barrier, intrusion detection, assessment, access control, and if applicable search equipment fails or becomes degraded.

Regulatory Basis:

Consistent with 10 CFR 73.55(n)(1)(v), licensees shall implement compensatory measures that ensure the effectiveness of the onsite physical protection program when there is a failure or degraded operation of security-related component or equipment.

Additionally, appropriate changes should be made during the next revision of the site's security plans to ensure the language clearly describes the intended function of

this EWS barrier as it pertains to the implementation of certain aspects of the physical protection program (e.g., access control, initiation of the protective strategy, etc.) in accordance with 10 CFR 73.55(e)(1)(ii).

Regulatory Basis:

Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(e)(1)(ii), the licensee shall describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.