REQUEST FOR ADDITIONAL INFORMATION

NSIR REVIEW - TAC D91660

10 CFR 50.54(p)(2) CHANGES TO SECURITY PLAN

ENTERGY NUCLEAR OPERATIONS, INC

INDIAN POINT ENERGY CENTER, UNITS 1, 2, AND 3

DOCKET NOs: 50-03, 50-247, and 50-286

LICENSE NOs: DPR 5, DPR-26, and DPR-64

By letter dated August 7, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12170A457), Entergy Nuclear Operations, Inc., (Entergy or the Licensee) submitted the Indian Point Energy Center (IPEC) Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 14, referred to hereafter as Security Plan. The Security Plan and Attachment NL-12-113, "Summary of Changes to "Physical Security, Training and Qualification, Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program," contained safeguards information that is protected in accordance with requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.21 and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission (NRC) staff is currently reviewing the submittal to ensure changes complied with 10 CFR 73 and that the changes implemented are authorized without prior NRC approval in accordance with the requirements in Section 50.54(p)(2) of 10 CFR.

The changes described in Revision 14 to the IPEC Security Plan are related to incorporating physical security systems and measures in the owner controlled areas (OCA) of IPEC, referred to as a Security Owner Controlled Area (SOCA), and are described in the following sections:

- PSP, Section 11,1, "Owner Control Area (OCA) Barriers" (Page 6-7)
- PSP, Section 15.3, "Intrusion Detection Equipment" (Page 18)
- PSP, Figure 2, "Site Map" (Page 34)
- PSP, Appendix A, "Glossary of Terms and Acronyms" (Pages A-6 and A-9)
- SCP, Section 8, "Protective Strategy" (Pages C-18 to C-19)

The NRC staff requests the following additional information for the licensee's changes to the Security Plan and the change basis to confirm that the changes: (1) meet all applicable prescriptive requirements of 10 CFR 73; (2) continue to meet the performance requirement of 10 CFR 73.55(b) and meet the license conditions of Facility Operating Licenses Nos. DPR-26 and DPR-64, as stated in Section 2 of the PSP, to "provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety;" (3) revised the licensing basis in the Security Plan to capture sufficient details of how regulatory requirements are met; and (4) did not decrease the effectiveness of the Security Plan, therefore provide at least

equivalent methods or approaches for physical security systems, administrative controls, and/or management systems previously established in the Security Plan to justify the application of the provisions of 10 CFR 50.54(p)(2), which allows Entergy to make changes without prior NRC approval:

1. PSP, Section 11.1, "Owner Controlled Area (OCA) Barriers," (Page 7, 1st paragraph of Section 11.1, 7th sentence), SCP, Section 8, "Protective Strategy," (Page C-18),and Attachment NL-12-113 (Pages 1 and 4): Describe how the SOCA physical barrier system meets the applicable requirements in 10 CFR 73.55(e), the performance requirements in 10 CFR 73.55(b) to protect against the design basis threat (DBT), and provides security functions that are at least equivalent to (or increase of) that previously established in the Security Plan. Specifically, describe the design and licensing bases, along with the change basis, that the SOCA physical barrier system provides an "additional layer of delay in attempted unauthorized entry" and supports the changes to the SCP, Section 8, "Protective Strategy," as stated on Page C-18, Outer Defense (1st sentence).

   a. Describe design and performance requirements for the SOCA physical barrier system and how it provides delay functions (e.g., drawings showing section and plan views, specific dimensions – including height above grade, material construction, installation specifications below grade, etc.). Incorporate the descriptions for design and performance requirements of the physical barrier system in Section 11.1 of the PSP.

   b. Describe the cumulative minimum delay provided by the design and location of the SOCA physical barrier system. Describe the licensing basis assumptions for the bounding minimum delay from breaching (mechanical or explosive) and the task times to bypass over and beneath the physical barrier system in the SOCA. Indicate the bounding minimum delay time credited for the separation distances between the physical barrier systems in the SOCA and in the protected area (PA), including the assumptions for the required minimum distance and maximum travel rate of the DBT adversary on foot and by other means of transport.

   c. Describe how openings for the passage of vehicles, personnel, and material, are controlled and secured. Describe the design and performance requirements for doors and physical barriers provided to secure the openings and confirm that the minimum delay is at least equivalent to the rest of the SOCA physical barrier system.

   d. Describe the change basis for how the SOCA physical barrier system provides additional delay that is at least equivalent to (or an increase of) the minimum delay previously established in the PSP, for implementing security response to interdict and neutralize the DBT. Specify the revised minimum time available for security response due to the change implemented.

   Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section

73.55(c)(3) of 10 CFR requires that 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. Sections 73.55(b)(3)(i) and 10 CFR 73.55(b)(3)(ii) of 10 CFR establish the requirements for a physical protection system to ensure capabilities to detect, assess, interdict, and neutralize threats up to and including the DBT and provide defense-in-depth through the integration of systems, technologies, programs, equipment, supporting processes, and implementation procedures needed to ensure effectiveness of the physical protection program, respectively. Sections 73.55(e)(1)(i), 73.55(e)(3)(i)(A), 73.55(e)(3)(ii), 73.55(e)(4), and 73.55(e)(6) of 10 CFR establish prescriptive regulatory requirements that are applicable to the design of a physical barrier system.

Additional information is needed to confirm that the licensee's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The descriptions of changes in the Revision 14 to the IPEC Security Plan did not provide sufficient descriptions for the physical barrier system at the SOCA. The licensee's change basis accompanying the submittal did not provide descriptions of the supporting technical bases demonstrating that the changes implemented did not decrease the effectiveness of the Security Plan. The changes to Section 11.1 of the PSP did not include the design and licensing bases for the SOCA physical barrier system and how the design meets the applicable requirements in 10 CFR 73.55(e), including the licensing basis capturing the minimum required delay.

2. <u>PSP, Section 11.1, "Owner Controlled Area (OCA) Barriers," (Page 6-7), PSP, Section 15.3, "Intrusion Detection Equipment," (Page 18), SCP, Section 8, "Protective Strategy," (Page C-18), and Attachment NL-12-113 (Pages 2 and 4)</u>: Describe how the changes incorporating the intrusion detection system (IDS) at the SOCA meet the applicable prescriptive requirements of 10 CFR 73.55(i) and the performance requirements in 10 CFR 73.55(b), to protect against the DBT. Provide the technical basis supporting that the changes are at least equivalent to that previously established for intrusion detection in the Security Plan. Provide the following specific design and licensing bases, along with justified change basis, that the dedicated IDS operate separately from the existing IDS (i.e., as stated in the 1st paragraph of Section 11.1, 3rd sentence), and incorporate the descriptions for the IDS in the SOCA in Section 15.3 of the PSP:

   a. Describe the design and performance requirements for the IDS in the SOCA. Specifically describe how the IDS meet the following requirements of 10 CFR 73.55(i) for intrusion detection:

      (1) Describe how the design of the IDS meets the requirement of 10 CFR 73.55(i)(1), to provide detection of unauthorized persons and facilitate the effective implementation of security response. Describe the reliability and provisions providing defense-in-depth for intrusion detection.

      (2) Describe how the Intrusion detection equipment meets the requirement of 10 CFR 73.55(i)(2) for annunciations and video assessment displays in at least two onsite alarm stations.

(3) Describe how the IDS meets the regulatory requirements to: (a) provide visual and audible annunciation of an alarm; (b) provide a visual display from which assessment of the detected activity can be made; (c) ensure that the annunciation of an alarm indicates the type and location of the alarm; (d) ensure that alarm devices to include transmission lines to annunciators are tamper indicating and self-checking; (e) 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 (f) support the initiation of a timely response in accordance with the security plans, protective strategy, and associated implementing procedures, in accordance with requirements of 10 CFR 73.55(i)(3)(i), 10 CFR 73.55(i)(3)(ii), 10 CFR 73.55(i)(3)(iii), 10 CFR 73.55(i)(3)(iv), 10 CFR 73.55(i)(3)(v), and 10 CFR 73.55(i)(3)(vi)), respectively.

b. Describe how the protection of unattended openings that intersect the physical barrier system at the SOCA meet the requirement of 10 CFR 73.55(i)(5)(iii) for detecting exploitation.

c. Provide the change basis for how the intrusion detection capability at the SOCA is at least equivalent to (or increase of) the intrusion detection capability previously established in Section 15.3. Describe how the additional IDS equipment at the SOCA provides at least equivalent (or increased) performance capability and reliability for intrusion detection. Indicate clearly, in Section 15.3, how the IDS at the SOCA changes or revises the previous licensing basis for the IDS that initiates the security response (i.e., starts all time lines for security response).

d. Provide the change basis that supports the replacement of the intrusion detection equipment (i.e., near Unit 2), previously specified in Section 15.3, with the type of intrusion detection equipment described in revised Section 15.3 and item No.1 in Attachment NL-12-113 (Page 2). Specifically describe how the change resulted in at least equivalent (or increased) effectiveness of intrusion detection previously established for meeting requirements of 10 CFR 73.55(i) and 10 CFR 73.55(b).

e. Incorporate, in Section 15.3, the design and performance descriptions and intended security functions of the intrusion detection equipment in the SOCA, to clearly establish the design basis for IDS equipment and the licensing basis for initiating security response (i.e., as described in revision of SCP Section 8, Page C-18).

f. Clarify whether the changes to the type of IDS equipment near Unit 2 [intentionally not stated] is a combination of intrusion detection technologies in a single system (as described in item No.1 in Attachment NL-12-113) or two separate complementary systems. Specifically address the following in Section 15.3: (1) Describe the design and performance requirements for the new [intentionally not stated] intrusion detection equipment that replaced the IDS equipment near Unit 2; (2) Describe how the new IDS equipment meets regulatory requirements for intrusion detection; (3) Clarify whether the replacement IDS equipment is a part of or is independent of the IDS equipment

in the SOCA; and (4) Provide the change basis supporting that the "change in detection improves range of detection capability, while reducing safety hazard during testing and improvement to alarm point reliability."

Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.55(c)(3) requires that 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. Sections 73.55(b)(3)(i) and 73.55(b)(3)(ii) of 10 CFR, establish the requirements for a physical protection system, as previously stated above.

Section 73.55(i)(2) of 10 CFR requires that 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. Sections 73.55(i)(3)(i) through 73.55(i)(3)(vi) of 10 CFR, requires that 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.

Section 73.55(i)(5)(iii) of 10 CFR requires that 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.

Additional information is needed to confirm that the licensee's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The descriptions of change basis submitted with Revision 14 to the IPEC Security Plan did not provide sufficient descriptions for the changes related to the IDS in the SOCA. The changes to Section 15.3 of the PSP did not include specific descriptions of IDS equipment that establish the design basis and capture the changes to the licensing basis for the intrusion detection function relied-on to initiate security response. In addition, the changes to Section 15.3 did not describe the design and performance requirements for the new IDS equipment that replaced those previously provided near Unit 2. The Attachment NL-12-113 did not provide a change basis supporting that the new IDS equipment provides at least equivalent (or increased) performance and reliability of the IDS equipment replaced for intrusion detection.

3. PSP, Section 11.1, "Owner Controlled Area (OCA) Barriers," (Page 6-7), PSP, Section 15.2, "Surveillance Systems," (Page 17), SCP, Section 8, "Protective Strategy," (Page C-18), and Attachment NL-12-113 (Page 1 and 4): Describe how the changes incorporating the surveillance system at the SOCA provide intrusion assessment capability and security functions that are at least equivalent to the previously established in Section 15.2, "Surveillance Systems," for meeting the applicable prescriptive requirements in 10 CFR 73.55(i) and the performance requirements in 10 CFR 73.55(b). Provide the following specific design and licensing bases, along with justified change basis, for the surveillance system, which operate separately from the PA (i.e., as stated in the 1st paragraph of Section 11.1, 3rd sentence), and incorporate the descriptions and the required security functions of the surveillance system for the SOCA in Section 15.2, "Surveillance System:"

   a. Describe design and performance requirements for the SOCA surveillance system, which assists security organization members in observing, detecting, and assessing alarms in Section 15.2. Specifically address how the SOCA surveillance system is "separate" from the previous surveillance system described in Section 15.2. Provide the following:

      (1) Indicate the type and describe the design and performance requirements for the surveillance system overseeing the SOCA. Describe how the surveillance system meets the requirements of 10 CFR 73.55(i)(5)(i) for surveillance, observation, and monitoring for satisfying the requirements of 10 CFR 73.55(b). Describe the system design provisions for ensuring reliability of intrusion assessment at the SOCA.

      (2) Describe how illumination is provided at the SOCA to satisfy the requirement of 10 CFR 73.55(i)(6)(i) and how it facilitates the performance assessment and security response for meeting the requirements of 10 CFR 73.55(b).

   b. Provide the change basis for how the surveillance system at the SOCA provides at least equivalent (or increased) performance capability and reliability for assessment, observation, and monitoring previously established in the PSP, Section 15.2, for initiating security response of the protective strategy.

   c. Describe, in Section 15.2, how the SOCA surveillance system provides the assessment capability relied-on to initiate security response, and how it is integrated with previously established requirements for surveillance system for intrusion assessment.

   Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.55(c)(3) requires that 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. Sections 73.55(b)(3)(i) and 73.55(b)(3)(ii) of 10 CFR establish the requirements for a physical protection system, as previously stated above. .

   Section 10 CFR 73.55(i)(5)(i) of 10 CFR requires that the physical protection program must include surveillance, observation, and monitoring as needed to satisfy the design

requirements of 10 CFR 73.55(b), identify indications of tampering, or otherwise implement the site protective strategy. Section 73.55(i)(5)(iii) of 10 CFR requires that 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. Section 73.55(i)(6)(i) of 10 CFR requires that all areas of the facility are provided with illumination necessary to satisfy the design requirements of 10 CFR 73.55(b), assessment, to implement security response of the protective strategy.

Additional information is needed to confirm that the licensee's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The descriptions of change bases submitted with Revision 14 to the IPEC Security Plan did not provide sufficient descriptions addressing the changes related to the surveillance system(s) for the SOCA. No changes were identified in Section 15.2 of the revised PSP to establish the design bases for the surveillance system(s) and capture the changes to the licensing basis for intrusion assessment function relied-on for initiating security response.

4. PSP, Section 11.1, "Owner Controlled Area (OCA) Barriers," (Page 6-7) and Section 15.1, "Illumination," (Page 17, 3rd paragraph), SCP, Section 8, "Protective Strategy," (Page C-18), and Attachment NL-12-113 (Pages 1 and 4): Describe design and performance requirements of the security lighting system providing illumination of the SOCA for performing assessment and security response. Provide the following specific design and licensing bases for the SOCA, along with update to Section 15.1 to address illumination:

   a. Describe the design and performance requirements for the SOCA security lighting system and how it provides illumination. Provide the descriptions for the design and performance requirements and capacity of primary and secondary power supplies to ensure required illumination. Describe the specific design criteria provided for illumination at the SOCA, that satisfy the requirements of 10 CFR 73.55(b) for implementing security response of the protective strategy, in accordance with the requirement of 10 CFR 73.55(i)(6)(i).

   b. Clarify and describe whether alternative technologies are provided to augment illumination at the SOCA. Specifically address the following: (1) describe how the alternative technology, as stated in Section 15.1, applies to the SOCA for assuring the capability to perform assessment in no-light or low-light conditions, and specifically during the loss of normal power; (2) describe how the alternative technology is integrated within the PA perimeter intrusion detection and assessment system meeting the requirements of 10 CFR 73.55(e)(7)(i)(C), 10 CFR 73.55(i)(2), and 10 CFR 73.55(i)(3)(vii); and (3) revise Section 15.1 to incorporate appropriate descriptions above to clearly capture the licensing basis describing the technology used to augment illumination for the assessment of the SOCA in no-light or low light conditions and during the loss of normal power, to enable assessment and security response meeting the requirements of 10 CFR 73.55(i)(6)(i).

c. Incorporate, in Section 15.1, the descriptions of the plant lighting system providing illumination required for the SOCA, and update the licensing basis to clearly capture the technology used to augment illumination for assessment in the SOCA in no-light or low light conditions and during the loss of normal power.

Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.55(c)(3) requires that 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. Sections 73.55(b)(3)(i) and 73.55(b)(3)(ii) establish the requirements for a physical protection system, as previously stated above.

Section 73.55(i)(6)(i) requires 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. Revision 14 of SCP, Section 8, established a licensing basis change capturing the protective strategy for meeting the requirements of 10 CFR 73.55(b), as described on Page C-18. Illumination is required for performing assessment and security responses for interdiction and neutralization. Section 73.55(i)(6)(iii) requires the licensee to describe in the security plans how the lighting requirements of this section are met and, if used, the type(s) and application of low-light technology.

Additional information is needed to confirm that the licensee's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The descriptions of change basis submitted with Revision 14 to the IPEC Security Plan did not provide sufficient descriptions for the change related to the illumination at the SOCA for assessment to initiate security response. No changes were identified in Section 15.1 of the revised PSP to establish the design basis for illumination and the alternative technology used to augment illumination, and capture the changes to the licensing basis for illumination relied-on for assessment and security response.

5. SCP, Section 8, "Protective Strategy," (Page C-18) and T&QP, Section 3.6.3, Tactical Weapon Qualifications" (Pages B-8 through B-9) and Attachment NL-12-113 (Pages 1-6): Describe the following related to the implementation of changes to the protective strategy based on the SOCA:

a. Describe how the physical security systems (e.g., detection/assessment systems, physical barrier system, illumination, etc.) in the SOCA affect the security response for interdiction and neutralization. Describe how the combination of the detection/assessment and delay capabilities are at least equivalent to (or increase) the required available time and opportunity for security response previously established in the PSP implementing the protective strategy. Describe how the detection and assessment capabilities at the SOCA facilitate the initiation of operator actions that are credited within target sets.

b. Describe how the changes affect security personnel training requirements described in the T&QP for tactical weapon qualifications, due to changes in the

distances (i.e., increased distances to SOCA). Confirm whether the established tactical training implemented and procedures for meeting T&QP Section 3.6.3(2) of 10 CFR are bounding or addressed the increased distances for interdiction and neutralization.

c. Describe how the implementation of the SOCA physical barrier system and 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 Section 73.55(b)(6) and Appendix B to 10 CFR Part 73 (Section VI, C.3). Describe the percentage of drills and exercises, conducted since implementation of the SOCA barrier, in which initiation of the protective strategy resulted from adversary detection at the SOCA.

d. Describe how the changes indicated in SCP Section 8 complied with state regulations on the use of deadly (or lethal) force for interdiction and neutralization at the location of the SOCA. Describe how the changes affected and resulted in updates to implementation procedures capturing details for justifying and training for the use of deadly force.

Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.55(c)(3) of 10 CFR requires that 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. Sections 73.55(b)(3)(i) and 73.55(b)(3)(ii) of 10 CFR establish the requirements for a physical protection system, as previously stated above.

Section 73.55(b)(6) of 10 CFR requires that the licensee shall establish, maintain, and implement a performance evaluation program in accordance with Appendix B to this part, to demonstrate and assess the effectiveness of armed responders and armed security officers to implement the licensee's protective strategy. Sections VI(C)(3)(a) through (3)(m) of Appendix B to 10 CFR Part 73 establish the prescriptive requirements applicable to the performance evaluation program, which included drills and exercises for evaluating security responses in implementing the licensee's protective strategy.

.

Additional information is needed to confirm that Entergy's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The changes implemented revised the previous licensing basis for initiating security response, and locations for interdiction and neutralization. The changes to distances may affect the T&QP course of fire established for qualifications of weapons using representative of distances to ensure reliability of the capability to perform interdiction and neutralization. Also, the changes implemented may substantively affect the location at which deadly force is used. Attachment NL-12-113 did not describe or confirm: (1) whether the changes implemented required the update of tactical training due to changes in the distances for neutralization; (2) whether the performance evaluation program incorporated and reviewed/tested the changes implemented; and (3) whether the changes complied with State regulations regarding the use of deadly force.

Additional information is required to confirm that the effects of implemented changes have been considered and adequately addressed.

6. PSP, Section 11.1, "Owner Controlled Area (OCA) Barriers," (Page 6-7), PSP, Section 14.4, "Searches," Section 14.4.1, "Vehicle Barrier System Access Control Point," PSP, Section 14.4.2, "PA Packages and Material Search, and Section 14.4.4, "PA Personnel Search," (Pages 12-14), SCP, Section 8, "Protective Strategy," (Page C-18), and Attachment NL-12-113 (Pages 1 and 4): Describe how the requirements for access control in 10 CFR 73.55(g) are met and clarify how searches of personnel, vehicle, and materials in Sections 14.4.2 through 14.4.4 are applicable to the SOCA. Specifically address the following:

   a. Describe how personnel, vehicle, and material access through the SOCA barrier are controlled in accordance with requirements of 10 CFR 73.55(g)(1).

   b. Describe design and performance requirements for personnel, vehicle and material access control portals at the SOCA. Indicate the location of the access control portals on Figure 2, Site Map, of the PSP. Confirm whether there is a second access control point at the SOCA, and indicate access point locations in Figure 2 of the PSP. Specify whether the access control portal is located outside of, or co-located with, the physical barrier system, in accordance with the requirement of 10 CFR 73.55(g)(1)(i)(A).

   c. Describe how the locking devices, intrusion detection equipment, and surveillance equipment implemented at the SOCA for personnel, vehicle, and material access control portal(s) meet the requirements of 10 CFR 73.55(g)(1)(i)(B).

   d. Describe how the access control portal physical barrier, intrusion detection, and assessment systems at the SOCA are integrated with adjacent physical security systems to provide equivalent performance and meet the required delay, detection, and assessment functions.

   e. Describe how the change to design of the access control system (i.e., a single access point) meets the requirement of 10 CFR 73.55(g)(4) for emergency conditions. Describe how the changes affect rapid ingress and egress for emergency conditions.

   f. Describe any fixed or portable physical security systems provided in the access control portal for meeting the requirements of 10 CFR 73.55(h)(2)(iv). Describe the search procedures implemented at the SOCA for meeting the requirements of 10 CFR 73.55(h)(2)(i).

   g. Confirm whether the descriptions in Sections 14.4.2 through 14.4.5 of the PSP apply to the search of packages and material, vehicles, and personnel at the access point at the SOCA. Clarify whether the PA access controls described in the PSP also remain in effect for meeting the requirements of 10 CFR 73.55(h)(3), and were not changed with the implementation of the SOCA.

Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.55(c)(3) of 10 CFR requires that 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. Sections 73.55(b)(3)(i) and 73.55(b)(3)(ii) of 10 CFR establish the requirements for a physical protection system, as previously stated above.

Section 73.55(g)(5)(i) of 10 CFR requires the licensee to design the access control system to accommodate the potential need for rapid ingress or egress of authorized individuals during emergency conditions or situations that could lead to emergency conditions.

Section 73.55(h)(2)(i) and (h)(2)(ii) of 10 CFR requires, where a licensee has established physical barriers in the OCA, implementation of search procedures for access control points in the barrier and at each vehicle access control point, the licensee shall describe in implementing procedures areas of a vehicle to be searched, and the items for which the search is intended to detect and prevent access. Areas of the vehicle to be searched must include, but are not limited to, the cab, engine compartment, undercarriage, and cargo area, respectively. Section 73.55(h)(2)(iii) of 10 CFR requires that vehicle searches must be performed by at least two trained and equipped security personnel, one of which must be armed. The armed individual shall be positioned to observe the search process and provide immediate response.

Section 73.55(h)(2)(i) of 10 CFR requires, where the licensee has established physical barriers in the OCA, that the licensee shall implement search procedures for access control points in the barrier. Section 73.55(h)(2)(iv) of 10 CFR requires that vehicle searches must be accomplished through the use of equipment capable of detecting firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage, or through visual and physical searches, or both, to ensure that all items are identified before granting access.

Additional information is needed to confirm that the licensee's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The changes to the PSP did not establish how the requirement of access control in 10 CFR 73.55(g) are met at the SOCA. The descriptions of the processes, security measures and systems for searches of personnel, vehicle, and material are conducted in Section 14.4.2 through 14.4.4 have not been updated to specify the applicability at the SOCA. Attachment NL-12-113, change basis, identified additional physical security systems inside the new personnel access point for the SOCA, but it is not described in the PSP.

7. PSP, Section 17, "Review, Evaluation, and Audit of the Physical Security Program," (Page 17), PSP, Section 20, "Maintenance, Testing, and Calibration," (Page 20-24), PSP, Section 21, "Compensatory Measures," (Pages 24-27), and Attachment NL-12-113 (Pages 1 and 4): Describe how the descriptions in Sections 17, 20, and 21, for program reviews, maintenance, testing, and calibration, and compensatory measures for the

physical security systems, are applied to implemented engineered and administrative controls, and management systems at the SOCA. Specifically address the following:

a. Describe how the implementation of the SOCA is included in security program reviews.

b. Describe how the SOCA 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 physical security systems in the SOCA are tested for operability and performance.

c. Describe how compensatory measures that are implemented for failure or degradation of SOCA physical security systems to perform their intended security functions (e.g., barriers, intrusion detection, assessment, access control, search, etc.). Revise Section 20 to incorporate changes in the licensing basis to specifically address the physical security systems and components for the SOCA.

Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.55(c)(3) of 10 CFR requires that 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. Sections 10 CFR 73.55(b)(3)(i) and 10 CFR 73.55(b)(3)(ii) of 10 CFR establish the requirements for a physical protection system, as previously stated above.

Section 73.55(m)(1) of 10 CFR requires, as a minimum, that the licensee shall review each element of the physical protection program at least every 24 months. Section 73.55(n)(1)(i) of 10 CFR requires that 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. Section 73.55(n)(1)(v) of 10 CFR requires that 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 components or equipment.

Additional information is needed to confirm that the licensee's changes to the licensing basis may be completed without NRC prior approval to implementation under the provisions of 10 CFR 73.55(p)(2) and that the Security Plan (i.e., licensing basis document) are appropriately revised to capture the changes and describe how regulatory requirements are met. The Revision 14 to the IPEC Security Plan and Attachment NL-12-113 did not adequately incorporate changes in the PSP to address the SOCA, therefore did not appropriate update licensing basis for reviews, maintenance, testing, and calibration, and compensatory measures to ensure availability and reliability of physical security systems and measures described in the SOCA to perform intended security functions. For example, Section 21 of the PSP only

addresses compensatory measures for the PA and Vital Area (VA) and does not specify whether they are applicable or what is required for the SOCA.

8. SCP, Section 8, "Protective Strategy," "Outer Defense – Vehicle Barrier System (VBS) and OCA Land-Based Assault", (Page C-18), and Attachment NL-12-113 (Page 4): Describe the process applied, supporting technical bases, and resulting conclusions for managing the safety/security interface, in accordance with the requirements of 10 CFR 73.58, "Safety/security interface requirements for nuclear power reactors." Specifically address the change from the availability of "two main points of access through the barrier" (Revision 13 of the PSP) to "a single point of access through the barrier" (Revision 14 of the PSP) for the changes implemented. Specifically address the following, including references to 10 CFR 73.58 assessment documentation, for the implementation and compliance with the requirements of 10 CFR 73.58:

   a. Describe the management system (processes and procedures) established for how the licensee meets the requirement of 10 CFR 73.58 and where it is described in the licensing basis document (i.e., Security Plan, Final Safety Analysis Report (FSAR), or others). Provide references for the plant procedures that captured the details for implementing the management of safety/security interface.

   b. Describe the implementation of the process, the scope of the assessment completed, and provide the results from the assessment of the safety/security interface for the plant configuration change that reduced two access points to a single access point. Include information (e.g., summaries and references) related to the assessment of possible effects on the operator actions for conduct of operations, emergency planning and response, and security contingency responses established for safety related emergencies or security contingency events.

   c. Describe how the plant configuration change, as described, was addressed under licensee's review and determination process for meeting requirements for 10 CFR 50.59 (i.e., plant configuration changes affecting the IPEC licensing basis (e.g., Updated FSAR). Provide summary of the results, including reference to the specific review and determination, of the 10 CFR 50.59 review and the resulting determination supporting that the change to the plant configuration may be implemented without prior NRC approval. Indicate whether the plant configuration change had been or will be appropriately incorporated in descriptions of the plant and site layout and characteristics in IPEC licensing documents (e.g., Updated FSAR, emergency plan/procedures, environmental report, etc.).

   Regulatory Basis: Section 50.34(c) of 10 CFR requires that the licensee's PSP describe how the requirements of 10 CFR Part 73 are met and implemented. Section 73.58 of 10 CFR require the management of safety/security interface. Section 10 CFR 73.58(b) of 10 CFR requires the licensee to assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security.

Section 73.58(c) of 10 CFR requires that the scope of changes to be assessed and managed must include planned and emergent activities (such as, but not limited to, physical modifications, procedural changes, changes to operator actions or security assignments, maintenance activities, system reconfiguration, access modification or restrictions, and changes to the security plan and its implementation). Section 73.58(d) of 10 CFR requires that where potential conflicts are identified, the licensee shall communicate them to appropriate licensee personnel and take compensatory and/or mitigative actions to maintain safety and security under applicable Commission regulations, requirements, and license conditions. In addition, Section 50.59 of 10 CFR requires the review and determination of changes affecting licensing basis described in the FSAR (or as updated).

The changes implementing the SOCA resulted in a plant configuration change, as described for access points to the plant. The plant configuration change potentially affects safety, emergency preparedness, and/or security. Entergy is required by 10 CFR 73.58(b) to assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to the plant configurations, including procedures changes. The PSP did not describe or incorporate by reference the Entergy's management systems (i.e., processes and procedures) for how the requirements of 10 CFR 73.58 will be met. The change basis submitted with Revision 14 of the Security Plan did not address how it complied with the requirements of 10 CFR 73.58. In addition, the change basis did not address whether the plant configuration changes for security affected the descriptions, analyses, and assumptions for rapid egress and access in updated FSAR, Emergency Plan, fire hazards analysis, and other licensing documents, and whether the review and determination under 10 CFR 50.59 process also supports that the changes to plant configuration may be made without prior NRC approval.