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To: [Madden, Fred](#)
Cc: [Singal, Balwant](#)
Subject: Request for Additional Information - Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 7 for the CPNPP
Date: Thursday, November 01, 2012 3:12:00 PM
Attachments: [NSIR Review TAC D91660 RAI to licensee ML12298A422.pdf](#)

Fred,

By letter dated July 26, 2012 (Agencywide Documents Access and Management System Accession No. ML12216A147), Luminant Generation Company LLC (Luminant Power), submitted the Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 7 for the Comanche Peak Nuclear Power Plant (CPNPP). The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure.

The Nuclear Regulatory Commission staff is currently reviewing the submittal to ensure compliance with Title 10 of the *Code of Federal Regulations*, Section 50.54(p)(2). The staff has determined that additional information is necessary to complete its review.

The Request for Additional Information (RAI) is attached. Please review the RAI and please provide the response within 60 days (in view of the ensuing holidays) from the receipt of the request. If for any reason, additional time is needed, please let us know as soon as you can so that the resources here can be properly planned.

Thanks

Kaly N. Kalyanam
Backup PM, CPNPP. Units 1 and 2

NSIR REVIEW - TAC D91660

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

COMANCHE PEAK NUCLEAR POWER PLANT UNITS 1 AND 2

LUMINANT GENERATION COMPANY LLC (LUMINANT POWER)

DOCKET NOS. 50-445 AND 50-446

LICENSE NOS. NPF-87 AND NPF-89

By letter dated July 26, 2012 (Agencywide Documents Access and Management System Accession No. ML12216A147), Luminant Generation Company LLC (Luminant Power) submitted the Comanche Peak Nuclear Power Plant's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan, Revision 7. The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission (NRC) staff is currently reviewing the submittal to ensure compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(p)(2). The NRC staff has determined that the additional information requested below is needed to complete its review.

1. Section 15.1 of the PSP describes illumination at the facility that supports the physical protection program. The last sentence of the third paragraph within Section 15.1 of the PSP indicates that the lighting levels within the isolation zones and select exterior areas of the protected area (PA) are maintained through a power source that is independent of the back-up power source. Describe the capabilities of the power source for the illumination assets within the isolation zones and select exterior areas of the PA during the loss of normal power. Describe how the illumination within the isolation zones, during the loss of normal power, enables the use of the camera systems at the PA boundary to meet the PA perimeter assessment requirements of 10 CFR 73.55. Section 15.3 describes alternative technology used for the assessment of the PA boundary. Describe how the alternative technology provides the capability to perform PA perimeter assessment in no-light or low-light conditions and specifically during the loss of normal power. Describe how the alternative technology is integrated within the PA perimeter intrusion detection and assessment systems to meet 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). See Security Frequently Asked Question 10-15. Additionally, appropriate changes should be made during the next revision of the site's PSP to ensure the language clearly describes the illumination and alternative technology capabilities for PA perimeter assessment during a loss of normal power, and how the alternative technology meets 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).

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.

Enclosure

Consistent with 10 CFR 73.55(e)(7)(i)(C), the isolation zone shall be monitored with assessment equipment designed to satisfy the requirements of Section 73.55(i) and provide real-time and play-back/recorded video images of the detected activities before and after each alarm annunciation.

Consistent with 10 CFR 73.55(i)(2), intrusion detection equipment must annunciate and video 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.

Consistent with 10 CFR 73.55(i)(3)(vii), the licensee's intrusion detection and assessment systems must be designed to ensure intrusion detection and assessment equipment at the PA perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

Consistent with 10 CFR 73.55(i)(6)(iii), the licensee shall 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.

2. Section 3.3 of the T&QP provides a description of the Critical Task Matrix (CTM) used within the security training and qualification program at the site. This section contains a duty position listing that is applicable to the CTM (Table 1) of the T&QP; however, the listing within Section 3.3 and the duty positions of the CTM within Table 1 are not consistent. The CTM within Table 1 does not identify armed security officers that are not assigned response duties. The CTM within Table 1 of the T&QP has two columns (second and third columns from the left) for armed responders, one of which identifies security officers with armed response duties. The duties of the armed responders that are identified within the critical task matrix (second column from the left) appear to conflict with the requirement of 10 CFR 73.55(k)(5)(iii). Provide clarifying descriptions of the duty positions identified in the second and third columns of the CTM, Table 1 of the T&QP. Describe the duties and responsibilities of the armed responders identified in the CTM, Table 1 of the T&QP, second column from the left. Describe the differences in the duties and responsibilities of the armed responders identified in the CTM, Table 1 of the T&QP, second and third columns from the left. Additionally, appropriate changes should be made during the next revision of the site's T&QP to ensure the language clearly describes the duty positions of the security organization and the critical tasks in which each duty position must be trained and qualified to implement the site's physical protection program and protective strategy.

Regulatory Basis:

Consistent with 10 CFR 73.55(k)(5)(iii), armed responders shall be available at all times inside the PA and may not be assigned other duties and responsibilities that could interfere with their assigned response duties.

Consistent with 10 CFR 73.55(c)(4), the licensee shall establish, maintain, and implement and follow a T&QP that describes how criteria set forth in Appendix B of 10 CFR Part 73, "General Criteria for Security Personnel" will be implemented.

Consistent with 10 CFR 73 Appendix B VI.A.6, the licensee may not allow any individual to perform any security function, assume any security duties or responsibilities, or return

to security duty, until that individual satisfies the training and qualification requirements of this appendix and the Commission-approved T&QP, unless specifically authorized by the Commission.