

VoglecolRAIsPEm Resource

From: Joshi, Ravindra
Sent: Thursday, January 10, 2013 7:57 AM
To: VoglecolRAIsPEm Resource
Subject: RE: Request for Additional InformationLetter No.1 Related to License Amendment request (LAR) 12-006 for the VEGP Units 3 and 4
Attachments: VOG-LAR-12-006-RAI-LTR-001.doc

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Subject: RE: Request for Additional Information Letter No.1 Related to License Amendment request (LAR) 12-006 for the VEGP Units 3 and 4
Sent Date: 1/10/2013 7:56:35 AM
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From: Joshi, Ravindra

Created By: Ravindra.Joshi@nrc.gov

Recipients:
"VogtlecolRAIsPEm Resource" <VogtlecolRAIsPEm.Resource@nrc.gov>
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January 10, 2013

Mr. B. L. Ivey
Vice President, Regulatory Affairs
Southern Nuclear Operating Company
P.O. Box 1295
Bin B022
Birmingham, AL 35201

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 01 RELATED TO
LICENSE AMENDMENT REQUEST (LAR) 12-006 FOR THE VOGTLE
ELECTRIC GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES

Dear Mr. Ivey:

In accordance with the provisions of 10 CFR 50.90, by letter dated October 17, 2012, Southern Nuclear Operating Company (SNC), submitted a license amendment request (LAR) 12-006 to the U. S. Nuclear Regulatory Commission (NRC) for its Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Combine licenses (Licenses Nos.NPF-91 and NPF-92, respectively). The NRC staff is performing a detailed review of this LAR to enable the staff to reach a conclusion on the safety of the proposed LAR.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, you may contact me at 301-415-6191 or ravindra.joshi@nrc.gov.

Sincerely,

/RA/

Ravindra G. Joshi, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 6592

Enclosure:
Request for Additional Information

CC: see next page

If you have any questions or comments concerning this matter, you may contact me at 301-415-6191 or ravindra.joshi@nrc.gov.

Sincerely,

/RA/

Ravindra G. Joshi, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 6592

Enclosure:
Request for Additional Information

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NAME	RFelts	RJoshi*	RJoshi *
DATE	12/13/12	1/9/13	1/9/13

*Approval captured electronically in the electronic RAI system.

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Request for Additional Information

Issue Date: 1/10/2013

Application Title: Vogtle Nuclear Site, Units 3 and 4, Dockets 52-0025 and 52-0026

Operating Company: Southern Nuclear Operating Co.

Docket No. 52-0025 and 52-0026

Review Section: 13.06 - Physical Security

Application Section: LAR-12-006, Enclosure 1, Section 3

QUESTIONS

13.06-1

In Section 3 of Enclosure 1 (Page 12 of 19) of LAR-12-006, Security Considerations, bullet 3, states, "No lighting is credited in TR-94 as originating from the Turbine Building; therefore the proposed changes have no impact on lighting."

With the overall height of the turbine building increasing by approximately 9 feet, clarify how the increased height of the turbine building structure does not impact the protected area lighting requirements. Explain what actions the licensee will implement to meet regulatory requirements as described in APP-GW-GLR-066, "AP1000 Safeguards Threat Assessment," (TR-94, Section 4.1, Page 18) and Physical Security Plan, (Dated July 30, 2010, Rev 2, Section 15.1).

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.

Regulatory Basis: Consistent with 10 CFR 73.55(i)(6)(ii), the licensee shall provide a minimum illumination level of 0.2 foot-candles, measured horizontally at ground level, in the isolation zones and appropriate exterior areas within the protected area. Alternatively, the licensee may augment the facility illumination system by means of low-light technology to meet the requirements of this section or otherwise implement the protective strategy.

Regulatory Basis: Consistent with 10 CFR 73.58(a), each operating nuclear power reactor licensee with a license issued under part 50 or 52 of this chapter shall comply with the requirements of this section. (b) The licensee shall 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. (c) 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). (d) 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.

13.06-2

In Section 3 of Enclosure 1 (Page 12 of 19) of LAR-12-006, Security Considerations, bullet 6, states, "The increase in overall height of the external fighting positions located on the turbine building exterior has no adverse impact on lines of sight or field of fire from these positions." Also Section 3 of Enclosure 1 (Page 12 of 19) of LAR-12-006, Security Considerations, bullet 8, "The overall height of the fighting position increases by only 9 feet (increasing the floor from approximately 87 feet above ground level to approximately 96 feet above ground level) and as such has no adverse impact on any lines of sight from these positions. Because the change does increase the height, the line of sight from the Turbine Building fighting positions is actually improved."

Explain the analysis and data the licensee used or developed that supports the conclusion that a 9 foot increase in height of all external fighting positions located on the turbine building exterior has no adverse impact on lines of sight or fields of fire and target engagements at these higher elevations. Also describe how the licensee will replicate this elevation and fields-of-fire as part of the Tactical Weapons Qualification as described in the Physical Security Plan, Appendix B, Section 3.6.3 (Dated July 30, 2010, Rev 2,)

Regulatory Basis: Consistent with 10 CFR 73.55(b)(4) The licensee shall analyze and identify site-specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of this section and shall account for these conditions in the design of the physical protection program.

Regulatory Basis: Consistent with 10 CFR Part 73, Appendix B, Section VI.A.5 The licensee shall ensure that the training and qualification program simulates, as closely as practicable, the specific conditions under which the individual shall be required to perform assigned duties and responsibilities.

Regulatory Basis: Consistent with 10 CFR Part 73, Appendix B, Section 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 training and qualification plan, unless specifically authorized by the Commission.

Regulatory Basis: Consistent with 10 CFR Part 73, Appendix B, Section VI.F.2, Tactical weapons qualification. The licensee Training and Qualification Plan must describe the firearms used, the firearms qualification program, and other tactical training required to implement the Commission-approved security plans, licensee protective strategy, and implementing procedures. Licensee developed tactical qualification and requalification courses must describe the performance criteria needed to include the site specific conditions (such as lighting, elevation, fields-of-fire) under which assigned personnel shall be required to carry-out their assigned duties.

13.06-3

Section 3 of Enclosure 1 (Page 12 of 19) of LAR-12-006, Security Considerations, final comment states, "...the review confirmed that this change does not impact any of the existing ITAAC related to physical security."

Clarify why the changes to the overall height of the turbine building and the modification to the first bay does not impact any of the existing PS-ITAAC.

a. Clarify how the increased height of the turbine building structure will be address as described in ITAAC 2.6.09.08 (Table 2.6.9-1 of Appendix C to Vogtle Units 3 COL and Appendix C to Vogtle Unit 4 COL). (NUREG-0800, SRP 14.3.12, PS-ITAAC # 5). Will any additional modification be made (for example, will lighting towers be relocated, increased in height or will additional lighting Units be added) to meet the established requirement?

b. Explain why the modification to the first bay as describe in Section 1 of LAR-12-006 was not included in Section 3 of Enclosure 1 of LAR-12-006, Security Considerations. Clarify the relationship to the first bay as described in Physical Security Plan, (Dated July 30, 2010, Rev 2, Section 14.5, AP1000 DCD PS-ITAAC # 7b). (NUREG-0800, SRP 14.3.12, PS-ITAAC # 1b).

Regulatory Basis: Consistent with 10 CFR 50.90, whenever a holder of a license, including a construction permit and operating license under this part, and an early site permit, combined license, and manufacturing license under part 52 of this chapter, desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.

Regulatory Basis: Consistent with 10 CFR 52.98(f), any modification to, addition to, or deletion from the terms and conditions of a combined license, including any modification to, addition to, or deletion from the inspections, tests, analyses, or related acceptance criteria contained in the license is a proposed amendment to the license. There must be an opportunity for a hearing on the amendment.