

Burkhardt, Janet

From: Sebrosky, Joseph
Sent: Wednesday, January 23, 2013 2:43 PM
To: Soenen, Philippe R
Cc: 'Baldwin, Thomas (DCPP)'; Burkhardt, Janet; Lent, Susan; Padovan, Mark; OKeefe, Neil
Subject: Request for Additional Information associated physical security plan update

Philippe Soenen
Regulatory Services – Diablo Canyon Power Plant

By letter dated August 3, 2012 (Agencywide Documents Access and Management System Accession No. ML12219A358), Pacific Gas and Electric Company, (the licensee) submitted Diablo Canyon Power Plant's Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 7. The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission 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).

Based on a review of the submittal, the NRC staff has determined that the following additional information (RAI) is required in order to complete its review. The request for additional information was discussed with Mr. Baldwin and Mr. Padovan on January 23, 2013. It was agreed that a response to these RAIs would be provided by March 8, 2013. Should the NRC determine that this RAI is no longer necessary prior to the scheduled date, the request will be withdrawn. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1132 or via e-mail at joseph.sebrosky@nrc.gov. The NRC staff has determined that no security-related or proprietary information is contained herein.

Sincerely,

Joe Sebrosky
Diablo Canyon Project Manager

REQUEST FOR ADDITIONAL INFORMATION

1. Section 15.1 of the PSP describes illumination at the site. Describe the type of alternative technology being implemented at the protected area (PA) perimeter to augment illumination. 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), 73.55(i)(2), and 73.55(i)(3)(vii). See Security Frequently Asked Question (SFAQ) 10-15. Additionally, appropriate changes should be made during the next revision of the site's PSP to ensure the language clearly describes the type(s) of technology used to augment illumination for the assessment of the PA perimeter in no-light or low light conditions and during the loss of normal power, and how the technology meets the requirements of 10 CFR 73.55(e)(7)(i)(C), 73.55(i)(2), and 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.

Consistent with 10 CFR 73.55(e)(7)(i)(C), isolation zones 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 protected area 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. The Critical Task Matrix (CTM), in Appendix B of the T&QP describes the training and qualification requirements for security personnel at the site. It is unclear within the CTM whether armed security officers and/or armed responders are trained and qualified on critical task 13. Describe whether armed security officers or armed responders are assigned to perform the duties and responsibilities associated with critical task 13, and if so, describe how they are trained and qualified to do so. Additionally, appropriate changes should be made during the next revision of the site's security plans to ensure that plans clearly describe specific duties and responsibilities of security personnel. If applicable, appropriate changes to the CTM should be made to delineate the security personnel that are trained and qualified on critical task 13 consistent with their duties and responsibilities.

Regulatory Basis:

Consistent with 10 CFR 73.55(c)(4), the licensee shall establish, maintain and implement, and follow, a Training and Qualification Plan that describes how the criteria set forth in appendix B, to this part, "General Criteria for Security Personnel," will be implemented.

Consistent with 10 CFR 73.55(d)(3), the licensee may not permit any individual to implement any part of the physical protection program unless the individual has been trained, equipped, and qualified to perform their assigned duties and responsibilities in accordance with appendix B of this part and the T&QP.

Consistent with 10 CFR 73.55(o)(2), compensatory measures must provide a level of protection that is equivalent to the protection that is equivalent to the protection that was provided by the degraded or inoperable, equipment, system, or components.

Consistent with 10 CFR Part 73, Appendix, B VI, A.1., the licensee shall ensure that all individuals who are assigned duties and responsibilities required to prevent significant core damage and spent fuel sabotage, implement the Commission approved security plans, licensee response strategy, and implementing procedures, meet minimum training and qualification requirements to ensure each individual possesses the knowledge, skills, and abilities required to effectively perform assigned duties and responsibilities.