

VoglecolRAIsPEm Resource

From: Jaffe, David
Sent: Wednesday, October 23, 2013 10:19 AM
To: VoglecolRAIsPEm Resource
Cc: CMEADORS@SOUTHERNCO.COM; Aughtman, Amy G.
(AGAUGHTM@SOUTHERNCO.COM)
Subject: RAI Concerning LAR 13-008
Attachments: RAI_7144.docx

The NRC staff has identified that additional information is needed to continue portions of the Review associated with LAR 13-008. 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.

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From: Jaffe, David

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Tracking Status: None

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Options

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Request for Additional Information

Issue Date:

Application Title: VEGP Units 3 and 4 - LARs

Operating Company: Southern Nuclear Operating Co.

Docket No. 52-025 and 52-026

Review Section: 13.06 - Physical Security

Application Section:

QUESTIONS

Question 1

In the Vogtle Electric Generating Plant (VEGP) License Amendment Request (LAR) regarding Fire Area Boundaries (LAR-13-008), the licensee indicated that a review of the VEGP Physical Security Plan was completed. The licensee's review determined that the proposed changes do not adversely affect the Physical Security Plan.

Explain why the LAR-13-008 does not address the Safety/Security interface requirements of 10 CFR 73.58 as described in FSAR Subsection 13.5.1, "Administrative Procedures."

"A process for implementing the safety/Security interface requirements of 10 CFR 73.58"

Describe the process used at Vogtle Units 3 & 4 to evaluate each of the proposed changes in LAR-13-008 to ensure that potential adverse effects from implementation of changes to safety and security measures were considered and how they will be addressed prior to implementation.

The licensee's response should confirm that LAR-13-008 changes do not compete or conflict with the capability of the site physical protection program to provide high assurance of adequate protection and common defense and security.

Confirm that the changes described in LAR-13-008 do not impact ingress and egress routes (not just the routes in the vital area) such that security force response personnel and operations personnel are able to respond to plant events during contingency or emergency situations uninhibited and unobstructed.

Confirm that the normal security configuration of the exterior door for the new stairway did not change.

Describe Vogtle Units 3 & 4's change process for LAR's to ensure that effective communications between the operations (safety) and security staffs is maintained through-out the construction phase until both units meet operational requirements.

Regulatory Reference:

10 CFR 73.58(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.

Question 2:

In the Vogtle Electric Generating Plant (VEGP), License Amendment Request (LAR) regarding Fire Area Boundaries (LAR-13-008), the licensee stated that a review of VEGP Physical Security Plan was completed regarding the changes identified in LAR-13-008. The licensee's review determined that the proposed changes do not adversely affect the Physical Security Plan.

Section 7, of the Safeguards Contingency Plan (SCP), describes a process for an Expert Panel to identify the necessary structures, systems and components to be protected. Was the expert panel as described in SCP Section 7, used during the review of the proposed changes described in LAR 13-008? If not, describe the expertise in security and key areas of plant design and operations of the panel members that was used during the review of the proposed changes described in LAR 13-008.

Confirm the that the panel's review included an evaluation of how the additional pathways within the turbine building, created by the new stairwell, as described in LAR 13-008, will not impact the armed responders located outside the vital areas, since these armed responders may be required to redeploy to other location to engage intruders.

Regulatory Reference:

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 10 CFR 73.55 and shall account for these conditions in the design of the physical protection program." Each applicant or licensee is responsible for analyzing and identifying site-specific conditions that affect how NRC requirements are implemented and to account for these site-specific conditions in the design and implementation of the onsite physical protection program.