

## NRR-PMDAPEm Resource

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**From:** Wengert, Thomas  
**Sent:** Tuesday, May 27, 2014 10:23 AM  
**To:** kmhenderson@aep.com  
**Cc:** hletheridge@aep.com; 'mkscarpello@aep.com' (mkscarpello@aep.com); Frost, John  
**Subject:** D.C. Cook Nuclear Plant - Revised Draft RAI Concerning Physical Security Plan Revision 10 Submittal  
**Attachments:** DC Cook - Revised Draft RAI Concerning PSP Rev 10 Submittal.pdf

By letter dated August 30, 2013, Indiana Michigan Power Company (I&M) submitted the Donald C. Cook Nuclear Plant's security plan Revision 10, which consists of the Physical Security Plan (PSP), Training and Qualification Plan, and Safeguards Contingency Plan (SCP). The enclosure to the letter contained Safeguards Information and, therefore, 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 is needed to complete its review.

Please see the attached revised draft request for additional information, which was clarified by the NRC staff during a conference call on May 20, 2014. During the call, I&M agreed to provide a response within 30 days.

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**From:** Wengert, Thomas

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**REQUEST FOR ADDITIONAL INFORMATION**  
**REGARDING TITLE 10 OF THE CODE OF FEDERAL REGULATIONS 50.54(p)(2)**  
**CHANGES TO THE SECURITY PLANS**  
**DONALD C. COOK NUCLEAR POWER PLANT UNITS 1 AND 2**  
**DOCKET NOS. 50-315 AND 50-316**

By letter dated August 30, 2013, Indiana Michigan Power Company (the licensee) submitted the Donald C. Cook Nuclear Power Plant's security plan Revision 10, which consists of the Physical Security Plan (PSP), Training and Qualification Plan, and Safeguards Contingency Plan (SCP). 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.

**RAI-1:** The NRC staff requests clarification of the Owner Controlled Area (OCA) Barrier as described in Section 11.1, Revision 10 of PSP.

Section 11.1 of the PSP describes safeguards systems that support the implementation of the protective strategy at the site. However, Section 7 of the SCP does not address these safeguards systems.

The second paragraph on page 10 of the PSP describes a barrier that is equipped with intrusion detection and assessment equipment. Describe the characteristics of this barrier and associated intrusion detection and assessment equipment, and how this barrier and associated intrusion detection and assessment equipment meets the requirements of 10 CFR 73.55. Specifically:

- a. Describe the function of this barrier by identifying how it and the associated intrusion detection and assessment capabilities are integrated within the physical protection program and protective strategy and how these capabilities are used to support the initiation of the protective strategy. Describe how the detection and assessment capability at this barrier facilitates the initiation of operator actions that are credited as target elements within target sets. Describe how the implementation of this barrier and associated 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 10 CFR Part 73, Appendix B VI, C.3. Describe the percentage of drills and exercises, conducted since implementation of this barrier and associated intrusion detection and assessment equipment, in which initiation of the protective strategy resulted from adversary detection at the barrier.

**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)(1)(ii), the licensee shall describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.

- b. Describe how the openings in this barrier are secured and monitored to prevent exploitation of the openings.

**Regulatory Basis:**

In accordance with 10 CFR 73.55(e)(4), consistent with the stated function to be performed, openings in any barrier or barrier system established to meet the requirements of this section must be secured and monitored to prevent exploitation of the opening.

- c. Describe how vehicle and material access through this barrier is controlled.

**Regulatory Basis:**

In accordance with 10 CFR 73.55(g)(1), consistent with the function of each barrier or barrier system, the licensee shall control personnel, vehicle, and material access, as applicable, at each access control point in accordance with the physical protection program design requirements of 10 CFR 73.55, and 10 CFR 73.55(b).

- d. Describe the personnel, vehicle and material access control portals of the barrier, specifically whether they are located outside of, or co-located with, the barrier.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(g)(1)(i)(A), access control portals must be located outside of, or concurrent with, the physical barrier system through which it controls access.

- e. Describe how the locking devices, intrusion detection equipment, and surveillance equipment implemented at the personnel, vehicle, and material access control portals within this barrier meet regulatory requirements.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(g)(1)(i)(B), access control portals must be equipped with locking devices, intrusion detection equipment, and surveillance equipment consistent with the intended function.

- f. Describe the search procedures that have been implemented at access control portals within this barrier.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(h)(2)(i), where the licensee has established physical barriers in the OCA, the licensee shall implement search procedures for access control points in the barrier.

- g. Describe how the intrusion detection and assessment equipment at this barrier provides, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the protective strategy.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(i)(1), the licensee shall establish and maintain intrusion detection and assessment systems that satisfy the design requirements of 10 CFR 73.55(b) and provide, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the licensee's protective strategy.

- h. Describe how the intrusion detection and assessment equipment at this barrier is designed to annunciate and display concurrently in two continuously staffed onsite alarm stations.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(i)(2), 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.

- i. Describe how the intrusion detection and assessment systems at this barrier are designed to: 1) provide visual and audible annunciation of an alarm; 2) provide a visual display from which assessment of the detected activity can be made; 3) ensure that the annunciation of an alarm indicates the type and location of the alarm; 4) ensure that alarm devices to include transmission lines to annunciators are tamper indicating and self-checking; 5) 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 6) support the initiation of a timely response in accordance with the security plans, protective strategy, and associated implementing procedures.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(i)(3)(i) through (i)(3)(vi), 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.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(i)(5)(iii), 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.

- j. Describe the type of illumination assets that are implemented to ensure the area of this barrier is provided with the 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)(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.

- k. Describe how the implementation of this barrier and associated intrusion detection and assessment equipment is included in security program reviews.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(m)(1), as a minimum the licensee shall review each element of the physical protection program at least every 24 months.

- l. Describe how this barrier and associated intrusion detection and assessment equipment 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 this barrier are tested for operability and performance.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(n)(1)(i), 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.

- m. Describe the compensatory measures that are implemented when the barrier, intrusion detection, assessment, access control, and, if applicable, search equipment fails or becomes degraded.

**Regulatory Basis:**

Consistent with 10 CFR 73.55(n)(1)(v), 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 component or equipment.

Additionally, appropriate changes should be made during the next revision of the site's security plans to ensure the language clearly describes the intended function of this barrier as it pertains to the implementation of certain aspects of the physical protection program (e.g., access control, initiation of the protective strategy, etc.) in accordance with 10 CFR 73.55(e)(1)(ii).

**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)(1)(ii), the licensee shall describe in the security plan, physical barriers, barrier systems, and their functions within the physical protection program.