

From: Graf, Timothy [mailto:TAG3@pge.com]
Sent: Wednesday, June 08, 2016 10:46 AM
To: Sullivan, Frederick <Frederick.Sullivan@nrc.gov>
Subject: [External_Sender] Letter to Diablo Canyon re: Early Warning Systems

Dear Mr. Sullivan,

Diablo Canyon (DCPP) received the attach letter entitled, "The U.S. Nuclear Regulatory Commission Inspection Approach Related to Industry Implementation of Early Warning Systems." We understand that the letter is primarily about requirements to credit voluntary early warning systems (EWS), however, it is not clear on EWS that is required to implement the protective strategy.

At DCPP, we rely on our EWS to implement our strategy (i.e. adversary timelines begin with detection prior to the protected area intrusion detection system).

The second paragraph describes the requirements for non-voluntary EWS such as DCPP's, however, it only discusses barriers described in 10 CFR 73.55(e). The next paragraph describes the requirements for voluntary EWS and must meet the requirements of both 10 CFR 73.55(e) and § 73.55(i).

Our question is if the strategy requires early detection, does this also have to be described in the Physical Security Plan and does the detection system need to meet the requirements of 10 CFR 73.55(i)?

Thank you,

Tim

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