

Duke Power Company Nuclear Security and Contingency Plan  
Revision 8 Synopsis of Changes

<u>Item</u>	<u>Section</u>	<u>Page</u>	<u>Description of Change</u>
1	LOEP	1,2,3	Changed the page references affected by Revision 8.
2	6.2.1	6-2	Revised the last paragraph on page 6-2 to address a change to 10 CFR 73.55 (d) (7) (i) (A) concerning the vital area access authorization list.
3	6.4	6-5	Revised section 6.4 to address a change to 10 CFR 73.55 (d) (4) concerning the requirements for vehicle escort.
4	15.0	15-1 > 15-6	This text has been declassified in accordance with Appendix 5 Safeguards and Information Control and Duke Power Company Nuclear System Directive 206 Safeguards and Information Control. SGI portion marking has been removed from the applicable paragraphs.

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Revision 8 Insertion Instructions

Upon receipt of Revision 8, insert these pages into the main body of the Plan in accordance with the following instructions:

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The superseded Chapter 15 pages are portion marked as Safeguards Information. If these pages are to be retained for historical record, the pages should be de-classified in accordance with NSD 206. If not retained, the pages should be destroyed in accordance with NSD 206.

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an acceptable contractor/vendor access authorization program. Establishment may be verbal. NRC personnel previously designated, in writing, by the Regional Administrator, Nuclear Regulatory Commission (NRC) Region II, as necessary for inspection of the station pursuant to 10 CFR 50.70, shall be considered authorized persons. In lieu of specification of need and authorization for access by the Regional Administrator, NRC Region II or his designee, determination of authorization and necessity for access shall be exercised by the Site Vice President or designee(s).

Persons allowed access to the protected area shall be identified prior to entry. Such identification shall include comparison of the individual with photo identification, such as photo drivers license or other similar document. Where such documents are unavailable, the Site Security Manager or designee(s) may verbally authorize access using other means of identification except for temporary clearance authorization which requires photo identification.

An access authorization list for all vital areas shall be maintained. The access authorization list shall be updated by cognizant licensee or non-licensee individuals designated by the Site Vice President at least every 31 days and shall be reapproved at least quarterly. Only individuals whose specific duties require access to vital areas during non-emergency conditions shall be included on the vital area access authorization list. Individuals granted unescorted

access shall be issued a picture identification badge coded to indicate access as follows to applicable areas:

Area 1 - PROTECTED AREA ONLY.

Area 2 - VITAL AREA - Includes all vital areas and security access areas excluding control room and security areas.

Area 3 - CONTROL ROOM ONLY.

Area 4 - SECURITY AREAS - Allows access to security areas which are

[McGuire & Oconee] CAS, SAS, ACS  
[Catawba] CAS, SAS, ACS and Security Computer Room.

Individuals not authorized unescorted access to areas 2, 3 or 4 shall be escorted while within the area(s).

#### 6.2.2 Escorted

All persons requiring escort into the protected area shall be escorted by a person or persons allowed unescorted access. The escort ratio shall not exceed one (1) to ten (10) for protected area and one (1) to five (5) for vital and SAA areas. The Site Security Manager may, in accordance with procedures, approve provisions allowing escort of more individuals than specified above provided an equivalent degree of protection against acts of radiological sabotage is assured.

### 6.3 SECURITY BADGES

All personnel allowed access to the protected, vital areas, security access areas or security access of the station shall be provided with a security badge, except under emergency conditions or during emergency drills. Persons authorized access without escort shall be provided with a picture identification badge coded to indicate authorized areas of access. Persons not allowed access without escort shall be badged to indicate an escort is required.

Picture badges shall be numbered for accountability and coded to indicate areas to which unescorted access is permitted. The badge consists of a data card and a photograph of the individual. The data card provides the individual's name, badge number, company affiliation and indicated it is a Catawba, McGuire or Oconee Nuclear Station badge. The photograph provides a pictorial identification of the individual and the color coding indicates either protected or vital area access authorization. The security computer badging information program shall indicate a badge expiration date for non-licensee personnel only.

Badges shall be displayed while inside the protected area. The badge should be worn on the upper front portion of the body so as to be clearly visible (except when operational or Radiation Protection reasons dictate otherwise).

Badges shall remain within the protected area except when under the physical control of station security personnel. Security force personnel and individuals escorted by security force personnel may wear picture badges exterior to the protected area while in the performance of their duties.

Picture identification badges shall be issued, controlled and accounted for by approved station security procedures. Procedures shall include, but not be limited to, issue and receipt and accountability.

An accountability check of badges shall be conducted daily and shall consist of a visual comparison of badges to storage locations and accounting for badges not in storage.

#### 6.4 VEHICLE ACCESS

Designated licensee vehicles or licensee owned or leased vehicles do not require an escort inside the protected area provided they are driven by personnel with unescorted access. The Site Security Manager or designee(s) shall designate those contractor owned vehicles pursuant to 10 CFR 73.55 as not requiring escort while within the protected area.

Designated licensee vehicles shall be limited in their use to onsite plant functions and shall remain in the protected area except for operational, maintenance, repair, security and emergency purposes. Contractor owned vehicles that are



not normally assigned to onsite plant functions may also be designated as licensee vehicles temporarily for short period (but not less than 24 hours) provided they are searched prior to entry and are subjected to the same controls as permanent designated licensee vehicles.

All contractor owned vehicles not designated for unescorted access shall be escorted by a security officer while within the protected area except under emergency conditions. A vehicle escort is not required if the vehicle is immobilized.

## 15.0 STANDBY SHUTDOWN SYSTEM

The Standby Shutdown System (SSS) is employed as the vital protection strategy. The SSS is designed to bring one or all units to hot standby in the event of a sabotage incident. Therefore, systems and components which perform a direct function in the operation of the SSS are classified as vital and located in vital areas. Appendix 1 provides a listing of vital areas, equipment, function or material.

### 15.1 DEGRADED STANDBY SHUTDOWN FACILITY OPERATIONS

#### [Catawba]

Compensatory measures shall be provided when the Standby Shutdown Facility (SSF) is considered inoperable as described in the Technical Specifications. The Technical Specification associated with SSF operability applies to plant operational modes 1, 2 and 3. Compensatory measures shall include, as applicable, but not limited to:

- (a) A continuous patrol within the cable room area by a security officer or watchman with continuous communications capability with the CAS and SAS to protect against successful radiological sabotage attempts, or
- (b) Secure cable room portals with mechanical locks which meet security requirements for mechanical locks and provide a patrol at least twice per shift.
- (c) Secure RN pump structure within fifteen (15) minutes of receipt of notification of an SSF degrade by posting a security officer or watchman with continuous communications capability with CAS and SAS at one (1) of

the pump structure doors to control access. The other door, if not manned, shall be equipped with a local alarm which will alert the officer or watchman of any unauthorized access attempt. In addition, the security officer or watchman shall conduct a walk-through patrol of the ground level elevation at least once every two (2) hours.

[McGuire] Compensatory measures shall be provided when the Standby Shutdown Facility (SSF) is considered inoperable as described in the Select Licensee Commitment (SLC). The SLC associated with SSF operability applies to plant operational modes 1,2 and 3. Compensatory measures shall include, as applicable, but not limited to:

- (a) A continuous patrol within both cable rooms by a security officer or watchman with continuous communications capability with the CAS and SAS to protect against successful radiological sabotage attempts, or
- (b) Secure cable room portals with mechanical locks which meets security plan requirements for mechanical locks and provide a patrol at least once per shift.

[Oconee]

The Standby Shutdown Facility (SSF) shall be considered degraded for security purposes when any system of the SSF is declared inoperable by Operations personnel. The Operations Shift Manager or designee shall be responsible for ensuring the Security Shift Supervisor is notified when the SSF is in a degraded condition. Station specific Technical

Specifications address the SSF system, testing and operability requirements.

Compensatory measures shall be initiated immediately and shall be fully implemented within two (2) hours after a system is declared inoperable by Operations personnel. Areas provided physical protection include Keowee Hydro Station, Unit 1 and 2 blockhouse, I&C battery rooms and electrical equipment rooms. Compensatory measures for each area are discussed below.

#### Keowee Hydro Station

Station vital power supplies are provided by Keowee Hydro Station via a buried cable to the Unit 1 and 2 blockhouse. Keowee Hydro Station is within the Oconee Nuclear Station owner controlled area but exterior to the station protected area. By design, Keowee Hydro Station does not meet protected or vital area barrier and alarm criteria as addressed in this plan.

The following compensatory measures shall be provided at Keowee Hydro Station during SSF inoperability.

- (1) All portals (excluding the roof hatch which is secured and considered inaccessible) shall be provided with a local alarm system which annunciates in the Keowee entrance area. In addition, a single alarm point for Keowee shall annunciate in the CAS and SAS for both portal alarms and duress alarm. The CAS operator shall assess duress and portal alarms for Keowee and direct response, if necessary. Portal alarms shall be tested prior to being used for compensatory measures and at least once every seven (7) days of continuous use.

- (2) Two (2) armed security officers shall be posted at Keowee Hydro Station to provide assessment and response capability. These armed security officers shall also control access, as specified by procedure, to Keowee Hydro Station.
- (3) Individuals with specific access needs shall be allowed unescorted access into Keowee based on an access authorization list which indicates those individuals which have been authorized access to the protected area. All individuals allowed unescorted access into Keowee shall be badged except under emergency conditions. All visitors shall be escorted by those individuals allowed unescorted access. The escort ratio shall not exceed 1 to 10. All visitors allowed escorted access into Keowee shall be badged to indicate that an escort is required.
- (4) Vehicles with specific access needs shall be allowed access as specified by procedure.

#### Unit 1 and 2 Blockhouse

Station vital power supplies are provided by Keowee Hydro Station via a buried cable to a standby transformer (CT-4) located in the Unit 1 and 2 blockhouse. A standby bus feeding power from the transformer to various station systems is also located in this area.

The following compensatory measures shall be provided at the Unit 1 and 2 blockhouse during SSF inoperability.

- (1) All portals shall be provided with a local access control system which allows access into the Unit 1 and 2 blockhouse by individuals authorized vital area access, or the portal

shall be secured in such a manner that would prevent unauthorized access (i.e., welded shut, mechanically locked, or a security officer posted at the portal). Where local access control hardware is provided, tamper alarms shall be provided to annunciate in the CAS and SAS per room or area. The portal access control system shall be tested when placed in service (use for compensatory measures) and at least once every seven (7) days of continuous use.

(2) Portals and observable portions of the barrier shall be patrolled by a armed security officer at least once per shift.

#### Battery Rooms (Unit 1, 2, 3)

Battery rooms contain 120 volt DC vital power batteries which provide backup power to various station systems.

The following compensatory measures shall be provided at the battery rooms (Unit 1, 2, 3) during SSF inoperability.

(1) All portals shall be provided with a local access control system which allows access into the battery rooms by individuals authorized vital area access shall be secured in such a manner that would prevent unauthorized access (i.e., welded shut, mechanically locked or a security officer posted at the portal). Where local access control hardware is provided, tamper alarms shall be provided to annunciate in the CAS and SAS per room or area. The portal access control system shall be tested when placed in service (use for compensatory measures) and at least once every seven (7) days of continuous use.

(2) Portals and observable portions of the barrier shall be patrolled by a armed security officer at least once per shift.

Equipment Rooms (Unit 1, 2, 3)

Equipment rooms contain 125 volt DC vital power equipment, i.e., battery chargers, distribution centers, etc., and 120 volt AC vital power equipment, i.e., inverters, etc.

The following compensatory measures shall be provided at the equipment rooms (Unit 1, 2, 3) during SSF inoperability:

(1) All portals shall be provided with a local access control system which allows access into the equipment rooms by individuals authorized vital area access or the portal shall be secured in such a manner that would prevent unauthorized access (i.e., welded shut, mechanically locked or a security officer posted at the portal). Where local access control hardware is provided, tamper alarms shall be provided to annunciate in the CAS and SAS per room or area.

The portal access control system shall be tested when placed in service (use for compensatory measures) and at least once every seven (7) days of continuous use.

2) Portals and observable portions of the barrier shall be patrolled by a armed security officer at least once per shift.

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Revision 8 Insertion Instructions

Upon receipt of Revision 8, insert these pages into Appendix 6 of the Plan in accordance with the following instructions:

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an acceptable contractor/vendor access authorization program. Establishment may be verbal. NRC personnel previously designated, in writing, by the Regional Administrator, Nuclear Regulatory Commission (NRC) Region II, as necessary for inspection of the station pursuant to 10 CFR 50.70, shall be considered authorized persons. In lieu of specification of need and authorization for access by the Regional Administrator, NRC Region II or his designee, determination of authorization and necessity for access shall be exercised by the Site Vice President or designee(s).

Persons allowed access to the protected area shall be identified prior to entry. Such identification shall include comparison of the individual with photo identification, such as photo drivers license or other similar document. Where such documents are unavailable, the Site Security Manager or designee(s) may verbally authorize access using other means of identification except for temporary clearance authorization which requires photo identification.

An access authorization list for all vital areas shall be maintained. The access authorization list shall be updated by cognizant licensee or non-licensee individuals designated by the Site Vice President at least every 31 days and shall be reapproved at least quarterly. Only individuals whose specific duties require access to vital areas during non-emergency conditions shall be included on the vital area access authorization list .

Individuals granted unescorted access shall be issued a picture identification badge and assigned access to the following areas, as applicable:

Area 1 -PROTECTED AREA ONLY.

Area 2 -VITAL AREA - Includes all vital areas and security access areas excluding control room and security areas.

Area 3 -CONTROL ROOM ONLY.

Area 4 -SECURITY AREAS - Allows access to security areas which are

[McGuire & Oconee] CAS, SAS, & ACS  
[Catawba] CAS, SAS, ACS and Security Computer Room.

Individuals not authorized unescorted access to areas 2, 3 or 4 shall be escorted while within the area(s). Administrative procedures are in place describing the methodology for personnel enrollment in and deletion from the electronic access control system.

Administrative procedures ensure the names of personnel whose employment is terminated, for whatever reason, are purged from the system and that their security badge or other entry devices, if applicable is/are retrieved. Any security badge which is not recovered shall be treated as lost or stolen and shall be invalidated.

#### 6.2.2 Escorted

All persons requiring escort into the protected area shall be escorted by a person or persons allowed

unescorted access. The escort ratio shall not exceed one (1) to ten (10) for protected area access and one (1) to five (5) for vital and SAA access. The Site Security Manager may, in accordance with procedures, approve provisions allowing escort of more individuals than specified above provided an equivalent degree of protection against acts of radiological sabotage is assured.

### 6.3 SECURITY BADGES

All personnel allowed access to the protected, vital areas, security access areas or security areas of the station shall be provided with a security badge, except under emergency conditions or during emergency response drills. Persons authorized access without escort shall be provided with a picture identification badge. Persons not allowed access without escort shall be badged to indicate an escort is required. These (visitor) badges will be assigned a number which will be used for tracking by the security access control system. Visitor badges do not unlock security doors; however, visitor badges unlock exit turnstiles to allow protected area exit.

Picture badges shall be encoded with the users ID number in a secure, encrypted format for accountability. The badge consists of a photograph with the individual's name and badge number. The photograph provides a pictorial identification of the individual. The security computer badging information program shall indicate a badge

expiration date for non-licensee personnel only, except for NRC personnel.

Badges shall be displayed while inside the protected area. The badge should be worn on the upper front portion of the body so as to be clearly visible (except when operational or Radiation Protection reasons dictate otherwise).

Authorized individuals retain possession of their assigned security badges when they exit the PA.

Security badges shall be assigned and controlled by approved procedures. Procedures shall include, but not be limited to, retrieval of terminated badges and accountability for lost and stolen badges.

#### 6.4 VEHICLE ACCESS

Designated licensee vehicles or licensee owned or leased vehicles do not require an escort inside the protected area provided they are driven by personnel with unescorted access. The Site Security Manager or designee(s) shall designate those contractor owned vehicles pursuant to 10 CFR 73.55 as not requiring escort while within the protected area.

Designated licensee vehicles shall be limited in their use to onsite plant functions and shall remain in the protected area except for operational, maintenance, repair, security and emergency purposes. Contractor

owned vehicles that are not normally assigned to onsite plant functions may also be designated as licensee vehicles temporarily for short periods (but not less than 24 hours) provided they are searched prior to entry and are subjected to the same controls as permanent designated licensee vehicles.

All contractor owned vehicles not designated for unescorted access shall be escorted by a security officer while within the protected area except under emergency conditions. A vehicle escort is not required if the vehicle is immobilized.