Southern Nuclear

B. H. Whitley
Director
Regulatory Affairs

Southern Nuclear
Operating Company, Inc.
3535 Colonnade Parkway
Birmingham, AL 35243
Tel 205.992.7079

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Docket No.: 52-026

ND-22-0000
10 CFR 50.90
10 CFR 52.63

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Request for License Amendment and Exemption:
Unit 4 Security ITAAC (LAR-22-001)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requests an amendment to the combined license (COL) for Vogtle Electric Generating Plant (VEGP) Unit 4 (License Number NPF-92).

The requested amendment proposes to depart from plant-specific Design Control Document Tier 1 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) information, and the corresponding COL Appendix C information by removing the uncompleted Unit 4 Design Description elements for the plant security system (SES) and security-related aspects of the VEGP Unit 4 buildings and the associated Unit 4 Physical Security (PS) ITAAC, also referred to as PS-ITAAC, and non-system based ITAAC. These changes reflect the interpretation and understanding discussed during the public telecom with NRC Staff held March 31, 2022.

Enclosure 1 provides the regulatory evaluation, technical evaluation, exemption evaluation, and environmental considerations for the proposed changes.

Enclosure 2 provides the significant hazards consideration.

Enclosure 3 provides a description of the requested changes and includes markups depicting the requested changes to the VEGP Units 3 and 4 licensing basis documents.

This letter contains no regulatory commitments. This letter has been reviewed and determined not to contain security-related or other sensitive or proprietary information.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia by transmitting a copy of this letter and its enclosures to the designated State Official.

Should you have any questions, please contact Amy Chamberlain at (205) 992-6361.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 24th of April 2022.

Respectfully submitted,

_____

Brian H. Whitley
Director, Regulatory Affairs
Southern Nuclear Operating Company

Enclosures
1) Vogtle Electric Generating Plant (VEGP) Unit 4 – Request for License Amendment and Exemption: Unit 4 Security ITAAC (LAR-22-001)
2) Vogtle Electric Generating Plant (VEGP) Unit 4 – Significant Hazards Consideration (LAR-22-001)
3) Vogtle Electric Generating Plant (VEGP) Unit 4 – Proposed Changes to Licensing Basis Documents (LAR-22-001)

cc: **NEED TO REPLACE WITH CURRENT LIST**

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Mr. P. P. Sena III (w/o enclosures)
Mr. M. D. Meier (w/o enclosures)
Mr. G. Chick
Mr. S. Stimac
Mr. P. Martino
Mr. D. L. McKinney (w/o enclosures)
Mr. T. W. Yelverton (w/o enclosures)
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Mr. W. Levis
Ms. C. A. Gayheart
Ms. M. Ronnlund
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Mr. J. Haswell
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State of Georgia

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Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Mr. L. Oriani (w/o enclosures)
Mr. T. Rubenstein (w/o enclosures)
Mr. M. Corletti
Mr. Z. Harper

Other

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Ms. L. A. Matis, Tetra Tech NUS, Inc.
Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.
Mr. S. Roetger, Georgia Public Service Commission
Mr. R. L. Trokey, Georgia Public Service Commission
Mr. K. C. Greene, Troutman Sanders
Mr. S. Blanton, Balch Bingham

Southern Nuclear Operating Company

ND-22-0000

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 4

Request for License Amendment and Exemption:

Unit 4 Security ITAAC
(LAR-22-001)

(This Enclosure consists of XX pages, including this cover page.)

AMENDMENT AND EXEMPTION REQUEST

VOGTLE ELECTRIC GENERATING PLANT UNIT 4

DOCKET NO. 52-026

1. SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.98(c) and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requests that the U.S. Nuclear Regulatory Commission (NRC or the Commission) amend the Vogtle Electric Generating Plant (VEGP) Unit 4 Combined License (COL) Number NPF-92. By this License Amendment Request (LAR), SNC proposes to depart from plant-specific Tier 1 Design Control Document (DCD) information, with corresponding changes to the associated COL Appendix C information.

The requested amendment proposes changes that would remove the Unit 4 Design Description elements for the plant security system (SES) and security-related aspects of the VEGP Unit 4 buildings and the associated Unit 4 Physical Security (PS) Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC), also referred to as PS-ITAAC, and non-system based ITAAC.

The requested amendment proposes changes that would identify the following Unit 4 ITAAC as "Not used":

Index No.	ITAAC No.	Index No.	ITAAC No.
	Plant Security System – Table 2.6.9-1		
644	2.6.09.05a	652	2.6.09.13a
646	2.6.09.05c	654	2.6.09.13c
647	2.6.09.06	655	2.6.09.15a
650	2.6.09.08		
	Site-Specific PS-ITAAC – Table C.2.6.9-2		
659	C.2.6.09.02	666	C.2.6.09.06
660	C.2.6.09.03a	667	C.2.6.09.07
661	C.2.6.09.03b	668	C.2.6.09.08a
664	C.2.6.09.05a	670	C.2.6.09.09
	Buildings – Table 3.3-6		
820	3.3.00.14	822	3.3.00.17
821	3.3.00.01		

Two Unit 4 PS-ITAAC [2.6.09.05b (645) and C.2.6.09.01 (658)] have already been closed and verified and, therefore, will are not affected by this activity.

The Commission regulations at 10 CFR Part 73, “Physical Protection of Plants and Materials,” provide the security regulatory framework pertaining to nuclear power reactors, including administrative, programmatic, and hardware-based requirements. The regulatory basis for the physical security ITAAC is found in 10 CFR 73.55 and conformance with these regulations is verified by testing and inspection activities throughout the construction of the VEGP units. Further, many aspects of the Vogtle security structures and systems are shared between the two AP1000 nuclear units at the Vogtle site and have already been confirmed to have been constructed as designed through the verification of the identical PS-ITAAC for Unit 3. Because the Unit 4 PS-ITAAC provide verbatim duplication of the security hardware requirements in 10 CFR 73.55 and share many commonalities with the PS-ITAAC for adjoining Unit 3 security structures and equipment, SNC finds completion of the Unit 4 PS-ITAAC involves an unnecessary burden on the facility’s staff and proposes a license amendment to remove the outstanding PS-ITAAC from the VEGP Unit 4 COL Appendix C, with corresponding changes to the plant-specific Tier 1 ITAAC.

Pursuant to Section 52.63(b)(1) and 52.98(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), SNC also requests an exemption in accordance with 10 CFR Part 52, Appendix D, “Design Certification Rule for the AP1000 Design,” Section VIII.A.4. This exemption request will allow a departure from the corresponding portions of the certified information in Tier 1 of the generic DCD.

This enclosure requests approval of the license amendment and exemption necessary to implement the changes identified and shown in Enclosure 3. The discussions of changes to the plant-specific Tier 1 information also impact the corresponding COL Appendix C information.

2. DETAILED DESCRIPTION AND TECHNICAL EVALUATION

Background

The COL application for VEGP Units 3 and 4 described the COL applicant’s physical protection program, which is intended to meet the NRC’s regulations for protection against the design-basis threat (DBT) of radiological sabotage as stated in 10 CFR 73.1, “Purpose and Scope,” and provide a high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety. Part 10 of the VEGP COL application incorporated by reference the AP1000 Design Certification Document (DCD) Tier 1 Section 2.6.9, which includes 17 PS-ITAAC that are in the scope of the AP1000 standard design, three non-system based ITAAC addressing security design characteristics DCD Tier 1 Section 3.3, Buildings, and 13 site-specific PS-ITAAC that were based on generic PS-ITAAC, which were developed in a coordinated effort between the NRC and the Nuclear Energy Institute (NEI). To improve the efficiency of the ITAAC completion and closure process, SNC requested license amendments, which were approved as VEGP Units 3 & 4 Amendment Nos. 85 & 84 and Amendment Nos 113 & 112, respectively, consolidating the original 33 PS ITAAC to a total of 20 PS-ITAAC for each unit.

To date, SNC has submitted ITAAC Closure Notifications (ICNs) for each of the 20 PS-ITAAC for VEGP Unit 3; 18 of which have been verified complete by the NRC staff[1] as indicated by issuance of Federal Register Notices (FRNs) of the staff's determination of the successful completion of the ITAAC. Additionally, two VEGP Unit 4 PS-ITAAC have been identified as closed via ICN submittals and verified complete by the NRC staff's issuance of FRNs.

Security System (SES) Description

The function of the AP1000 plant security system (SES) is to protect the plant against acts of radiological sabotage that could threaten the health and safety of the public. The SES provides surveillance, intrusion detection, deterrence and delay, and communication capabilities to permit response and countermeasures by plant security forces and law enforcement authorities against potential intrusion to plant protected and vital areas. The key elements of the subsystems that comprise the SES include physical barriers, defensive positions, access control, intrusion detection, alarm stations, communications, and security power. Additionally, the design and configuration of the structures housing the SES equipment are instrumental in supporting SES functions.

The entire system is designed to meet the requirements established in 10 CFR 73.55. The SES meets or supports the four functional objectives of deterrence, detection, delay (denial), and response. The SES is designed to deter intruders, provide detection capability at critical locations throughout the plant, provide delay features, and provide the ability for the security force to efficiently respond to the threat. The SES does not perform or support any safety-related functions; however, it does provide protection of safety-related equipment, so that in the event of a threat, up to and including the design basis threat, the equipment will not be prevented from performing its safety-related function.

The design objective of the SES is to provide engineered features within the plant design that meet specific design objectives, including the following:

- Providing access control capability for the plant protected and vital areas by limiting entry to authorized personnel, vehicles, and material only.
- Providing video surveillance and assessment capability for the plant protected and vital areas.
- Providing a centralized command-and-control computer network and communications for the plant security response force.
- Providing or utilizing communications capability for the plant security response force, operations, and emergency response personnel.
- Providing deterrence and delay of attempted unauthorized entry into the plant vital areas.

[1] The number of Unit 3 ITAAC submitted via ICN and the number verified to be closed by NRC will have to be updated prior to submittal of the LAR. As of 3/24, 19 ICNs were submitted and 18 were verified.

- Providing hardened defensive positions for protection of the plant security response force from the elements of the design basis threat.
- Ensuring adequate lighting as necessary for essential elements of the surveillance and assessment security systems and to allow effective response by the plant security response force.
- Providing a power supply as necessary for subsystems of the security system, including but not limited to, intrusion detection, access control, lighting, and video assessment/surveillance security systems.
- Providing detection of attempted unauthorized entry or exit to the plant vital areas.

These design objectives are achieved by providing an SES, supported by security-related structural features, that satisfies the following design description elements:

1. The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4. **[73.55(e)(5)]**
3. Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area. **[73.55(e)(9)(vi), (vi)(A), and (vi)(B)]**
4. Vital areas are locked and alarmed with active intrusion detection systems that annunciate in the central and secondary alarm stations upon intrusion into a vital area.
5. a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after each alarm annunciation within the perimeter barrier.

   b) The central and secondary alarm stations are located inside the protected area, and the interior of each alarm station is not visible from the perimeter of the protected area. **[73.55(i)(4)(ii)(A)]**

   c) The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel.
6. The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs.
7. a) Vital equipment is located only within a vital area.

   b) Access to vital equipment requires passage through the vital area barrier.
8. Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles.
9. Emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

13. a) The central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities.

    b) The central and secondary alarm stations are capable of continuous communications with security personnel.

    c) Non-portable communication equipment in the central and secondary alarm stations remains operable from an independent power source in the event of loss of normal power.

15. a) Security alarm devices including transmission lines to annunciators are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location.

    b) Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm station.

16. Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Need for Change

1. Transitional Security Measures and Integration with U1 & 2 Security System

   The VEGP Units 3 and 4 COL Physical Security Plan (PSP) describes the completed VEGP site protected area that will encompass Units 1 through 4. Appendix E, “Measures During New Plant Construction,” of the COL PSP describes security provisions that are implemented during construction of a new commercial power reactor within one mile of the operating plant’s protected area. For Unit 3 to load fuel and start operation while Unit 4 is still under construction, protective measures were determined to be needed on the western boundary of Unit 3 to meet 10 CFR 73.55 requirements for a contiguous protected area, delay barriers and vehicle barrier system (VBS).

   To address this need SNC requested a license amendment to modify Appendix E. This licensing action, identified as VEGP Units 3 and 4 License Amendment Request (LAR) 18-008, “Physical Security Plan, Appendix E Additions for Unit 3 Transitional Security Measures and Unit 4 Plant-Specific Emergency Planning ITAAC Revision,” was submitted by letter ND-18-0060, dated September 28, 2018 [ML18271A116], and approved as Amendment Nos. 160 and 158 for VEGP Units 3 and 4, respectively [ML19092A449].

   The changes modified Appendix E by adding information describing the protected area barrier, intrusion detection, assessment, lighting, and VBS in addition to delay features and other security-related features determined to be needed for protective strategy development (hereafter referred to as Transitional Security Measures (TSMs)) to be installed on the western boundary of Unit 3. These TSMs, combined with the permanent security features, created a contiguous protected area barrier, delay barriers, and VBS that circumscribe VEGP Units 1 through 3. This amendment allowed establishment of the western-most protected area barrier

and VBS supporting contiguous boundaries for VEGP Units 1, 2, and 3 in accordance with regulatory requirements in 10 CFR 73.55 while Unit 4 is still under construction.

With Unit 3 construction nearing completion, the TSMs allow Unit 3 to load fuel and start operation and they also allow the integration of Units 1 through 3 with permanent shared security features, while Unit 4 is still under construction. The TSMs will remain in place until the physical security measures for the four-unit site are in their final configuration. The TSMs in Appendix E will subsequently be removed or altered to reflect the final site status.

2. Redundant Regulatory Requirements

The Commission regulations at 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," delineate the administrative, physical (i.e., hardware), and operational requirements for a physical protection program for a nuclear power reactor licensee. The general performance objective of the physical protection program, including the security organization, is to "provide high assurance that the activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and security." [73.55(b)(1)] To satisfy this objective, the physical protection program must "provide defense-in-depth, through the integration of systems, technologies, programs, equipment, supporting processes, and implementing procedures as needed to ensure the effectiveness of the physical protection program." [73.55(b)(3)(ii)] Paragraph 73.55(a)(4) requires that "… holders of a combined license under the provisions of part 52 of this chapter, shall implement the requirements of this section before fuel is allowed onsite (protected area)." [emphasis added]

By SNC's letter ND-21-0977, dated November 1, 2021 [ML21305B797], SNC requested a schedular exemption to allow the implementation milestone for the physical security requirements of 10 CFR 73.55(a)(4) to be extended to a period "after the NRC declares the requirements of 10 CFR 52.103(g) are satisfied and prior to each unit's initial fuel load into the reactor." The Commission granted this exemption by letter dated November 23, 2021 [ML21320A043], effectively modifying the required implementation date for both VEGP Unit 3 and Unit 4. However, SNC plans to implement the requirements of 10 CFR 73.67 for the receipt and storage of new fuel as special nuclear material (SNM) prior to implementing the 10 CFR 73.55 requirements for physical protection of licensed activities against radiological sabotage. As discussed in SNC's letter ND-11-0313, dated March 3, 2011 [ML110660153], SNC has developed (and implemented) an SNM Physical Protection Program (SNMPPP) that provides the 10 CFR Part 70 licensing basis applicable to implementing the 10 CFR 73.67(d), (e), (f), and (g) requirements between the time period beginning prior to the receipt of SNM and ending with the declaration of an operational protected area. The letter further explains that new fuel as SNM may be received and stored in a controlled access area (CAA) in accordance with the requirements of 10 CFR 73.67, until such time as an operational protected area that satisfies the requirements of 10 CFR 73.55(e)(8) is established. Because SNM will be stored inside the CAA, which is entirely encompassed within the boundary of the proposed protected area, upon declaration of an operational protected area, the remaining requirements of 10 CFR 73.55 shall be implemented. The protected area shall be established and declared operational prior to initial fuel load, which is also consistent with the timeframe provided in the November 2021 exemption.

10 CFR 52.97(b) requires the NRC to identify within the combined license the inspections, tests, and analyses … that the licensee shall perform, and the acceptance criteria that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the provisions of the Act, and the Commission's rules and regulations. In consideration of the physical protection performance objective of 10 CFR 73.55(b)(3)(ii), it follows that the hardware ITAAC applicable to physical protection would include the systems, technologies, and equipment that are deemed necessary to ensure the effectiveness of the physical protection program. One criterion for a "necessary and sufficient" ITAAC is that it can be completed prior to the initial fuel loading. [emphasis added]

The effort required to implement the closure of the Unit 4 PS-ITAAC represents a substantial human capital burden to manage, plan, implement, review, document, approve, and close these 20 ITAAC. It is estimated that this effort would involve at least 2,200 man-hours for the SNC ITAAC organization alone to close the 18 remaining ITAAC, in addition to the effort that will already be expended to satisfy the corresponding physical security requirements in §73.55. The human capital burden would include:

- Reviewing security test procedures to ensure the ITAAC is met
- Performing daily scrubs of the Corrective Action Program (CAP) to identify and track ITAAC impacts
- Maintaining CAP generation, trending, and coding for ITAAC maintenance
- Performing various meeting and coordination efforts to ensure ITAAC are met
- Responding to plant inquiries regarding ITAAC content
- Performing Primary Closure Document (PCD) development, review, and support activities through PCD approval
- Developing ITAAC closure packages
- Developing, reviewing, and approving ITAAC Closure Notifications (ICNs)
- ITAAC records management
- Scheduling and Project Management activities

The human capital burden discussed above applies to SNC's ITAAC organization. A significant burden would also be expected to be applied to other SNC organizations. For example, conducting tests and inspections on security systems will involve a considerable oversight and support of virtually the entire Security force for the VEGP site. While the majority of security officers will not provide direct support for the ITAAC activities, it is understood that the entire security organization will have to be made aware of these activities so that they provide the appropriate response to the nuisance alarms that are likely to be generated during such testing.

In summary, the hardware and programmatic requirements of 10 CFR 73.55, which are necessary to provide high assurance of the ability to protect the plant's special nuclear material against the design basis threat of radiological sabotage, are required to be implemented prior to initial loading of fuel into the reactor per the licensee's exemption to § 73.55(a)(4), whereas the selected hardware requirements of the same § 73.55 that were selected as PS-ITAAC are not required to be confirmed to be completed until prior to initial fuel loading. The § 73.55(a)(4) requirements are confirmed to have been completed through the implementation of the same rigorous audit, inspection, training, and drill process that has served the Agency for previously licensed 10 CFR Part 50 nuclear power plants, whereas, the onerous and, in this case, redundant ITAAC closure and inspection process is followed to re-

verify conformance of the security hardware features, many of which have already been verified for Unit 3, will be followed for the Unit 4 PS-ITAAC.

Placeholder for discussion of need for change based on impacts on integrated Part 50 (U1 & U2) and Part 52 (U3) Security Programs while completing U4 ITAAC

3. Common Attributes of Unit 3 and Unit 4 Security System

The Vogtle Units 3 and 4 security system (SES) includes several common attributes and structures, systems, and components (SSCs) that should be factored into the ITAAC development, performance, and closure processes. Of significance, the SES includes several structures and security features that are shared between the two (and in many cases, four) VEGP units. The VEGP units will share a contiguous protected area perimeter, central alarm station (CAS), secondary alarm station (SAS), personnel access portal (PAP), access authorization system, security computer, as well as portions of various other security systems. Following integration with the two 10 CFR Part 50 VEGP units (Units 1 and 2), these SSCs will be shared by all four VEGP units.

Additionally, the implementation of a standard AP1000 design also means that many of the design, fabrication/manufacturer, construction, and commissioning attributes are common for VEGP Units 3 and 4. Beyond sharing a common design and licensing basis, examples of commonalities between the security system for the two AP1000 units include:

- Common design
  - Common design authority and design review organization
  - Common design process
- Common calculations and analyses (e.g., blast analysis)
- Common procurement and fabrication
- Common fabrication and construction vendors
- Common Quality requirements
  - Common inspection procedures and processes
  - Common testing procedures and processes
- Common documentation
  - Specifications
  - Procedures
  - ITAAC Principal Closure Documents
- Common configuration management processes

While it is understood that many, if not all, of these attributes also apply to the other system based and non-system based design description commitments that are verified by ITAAC, their effect on the performance of ITAAC is more evident when assessing the benefits of performing ITAAC on systems and structures that are shared between two nuclear units, such as Vogtle Units 3 and 4.

Proposed Change

Because the Unit 4 PS-ITAAC provide verbatim duplication of the security hardware requirements in 10 CFR 73.55 and share many commonalities with the PS-ITAAC for adjoining Unit 3 security structures and equipment, SNC finds completion of the Unit 4 PS-ITAAC involves an unnecessary

burden on the facility's staff and proposes a license amendment to remove the outstanding PS-ITAAC from the VEGP Unit 4 COL Appendix C, with corresponding changes to the plant-specific Tier 1 ITAAC.

3. TECHNICAL JUSTIFICATION

3.1 TECHNICAL EVALUATION OF DEPARTURE

Detailed Description and Technical Evaluation

This section identifies and describes each PS-ITAAC separately, provides the underlying regulatory basis for ITAAC, and explains the basis for the proposed changes to each ITAAC, including the commonalities with the corresponding Unit 3 ITAAC.

VEGP Unit 4 ITAAC 2.6.09.05a (Index No. 644), SES Alarms & Video Display in Alarm Stations

ITAAC 2.6.09.05a (644) consists of two elements, identified as items 5.a) and 15.b, as follows:

Design Commitment

5.a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after each alarm annunciation within the perimeter area barrier.

15.b) Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm stations.

Inspections, Tests, Analyses

5.a) Test, inspection, or a combination of test and inspections of the installed systems will be performed.

15.b) Tests will be performed on intrusion detection and assessment equipment.

Acceptance Criteria

5.a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.

15.b) The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.05a is specified in 10 CFR 73.55(i)(2) and 10 CFR 73.55(e)(7)(i)(C), as presented below.

10 CFR 73.55(i)(2) specifies:

> "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."

10 CFR 73.55(e)(7)(i)(C) specifies:

"The isolation zone shall be:

(C) Monitored with assessment equipment designed to satisfy the requirements of § 73.55(i) and provide real-time and play-back/recorded video images of the detected activities before and after each alarm annunciation."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) for VEGP Unit 3 ITAAC 2.6.09.05a (Index No. 644) was submitted by SNC Letter ND-21-0270 on December 17, 2021 [ML21351A252].

The ICN identified the following ITAAC determination basis for element 5.a):

"Tests were performed as identified in ITAAC Technical Report SV3-SES-ITR-800644 (Reference 1) to verify that VEGP Unit 3 intrusion detection system perimeter area barrier alarms resulted in concurrent displays of security alarm annunciation and video assessment information in both the CAS and SAS, video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier, and satisfy the applicable alarm annunciation and video assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i) and 10 CFR 73.55(e)(7)(i)(C).

The tests identified in Reference 1 tested each segment of the VEGP Unit 3 protected area perimeter Intrusion detection system by crossing or disturbing the zone of detection and confirming that concurrent displays of the security alarm annunciation and video assessment Information were observed in both the CAS and SAS. The tests identified in Reference 1 then confirmed that for each perimeter barrier Intrusion detection system alarm the security video assessment system provided video Image recording with real time display of video Images to provide post-alarm activity assessment and playback of recorded video Images for pre-alarm activity assessment to both CAS and SAS."

The ICN identified the following ITAAC determination basis for element 15.b):

"Testing was performed as identified in Reference 1 to verify that VEGP Unit 3 intrusion detection system alarms provided concurrent visual displays and audible annunciations of the alarms in both the CAS and SAS, and satisfy the applicable Intrusion detection alarm requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(1).

The tests identified in Reference 1 tested the VEGP Unit 3 intrusion detection system by Initiating a security alarm signal for each Intrusion detection device identified in the Vogtle Plant Security System Database (Reference 2) and confirming that, for each alarm signal, a concurrent visual display and audible annunciation of the alarm was observed in both CAS and SAS."

References

1. SV3-SES-ITR-800644, Intrusion Detection/Video Assessment Testing: ITAAC 2.6.09.05a, Rev 0 (SRI)
2. SV0-SES-J0X-800000, Vogtle Plant Security System Database, Revision 7 (SRI)
3. 2.6.09.05a-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a Principal Closure Document (PCD) test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD and the plant security system database, which are withheld from public disclosure as Security-Related Information (SRI) in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.05a Completion Package (Reference 3). The Notification of the NRC's determination that the ITAAC was successfully completed and published in the Federal Register (87*FR*5866).

Basis for Removing Unit 4 ITAAC 2.6.09.05a (Index #644)

The Unit 3 PCN describes testing that was performed to verify that the intrusion detection system for the Field Equipment Panel (FEP) areas that comprise the west, south, and east portions of the integrated perimeter barrier concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations. The FEPs that form the barrier between Units 3 and 4 will not be required when Unit 4 is integrated into the perimeter barrier, and the additional FEPs that were partially completed at the time of the Unit 3 tests will be incorporated into the integrated Unit 1 – 4 perimeter barrier. The design, construction, inspection, and testing of these additional FEPs will be consistent with the FEPs that were subject to Unit 3 ITAAC 2.6.09.05a.

The testing associated with these FEPs also confirmed that security alarm and video assessment information is displayed concurrently in the CAS and SAS, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier. The intrusion alarm and video image recording and playback capabilities are a function of the shared security computer, so the testing performed for Unit 3 also applies to Unit 4. For Unit 4, zone intrusion detection testing will be performed using a temporary testing computer (supplied with the permanent security computer) prior to making these connections with the security computer.

The Personnel Access Point (PAP) Building (304) is shared between Units 3 and 4; therefore, testing of the PAP Building 304 fiber optic intrusion detection system performed for Unit 3 applies equally to Unit 4 and need not be repeated for Unit 4 ITAAC 2.6.09.05a. Similarly, testing of the PAP Building 304 turnstile and access door intrusion detection need not be repeated for Unit 4.

ITAAC 2.6.09.05a also tests the intrusion detection system for Vital Area (VA) and Non-Vital Area (NVA) access doors that are located in the shared CAS/SAS and in the Unit 3 Nuclear Island and power block buildings. As discussed previously, common or shared SSCs that were tested to support closure of the Unit 3 ITAAC need not be retested for the Unit 4 ITAAC. Further, for Unit 4, the access door intrusion detection testing will be performed using the temporary testing computer prior to making these connections with the security computer.

In conclusion, the testing required to confirm the Unit 4 intrusion detection system was constructed as designed was either satisfied by shared system testing for the corresponding Unit 3 ITAAC or will be satisfied in accordance with 10 CFR 73.55(a)(4), including 10 CFR 73.55(i)(2) and 10 CFR 73.55(e)(7)(i)(C), by construction and installation tests during installation of the system, and therefore, Unit 4 ITAAC 2.6.09.05a is requested to be removed from the Plant-Specific Tier 1 and Unit 4 COL Appendix C due to its redundancy.

VEGP Unit 4 ITAAC 2.6.09.05c (Index No. 646), SES Alarm Stations – Single Act Survivability

ITAAC 2.6.09.05c (646) consists of a single element, identified as item 5.c), as follows:

Design Commitment

5.c) The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel.

Inspections, Tests, Analyses

Inspections and/or analysis of the central and secondary alarm station will be performed.

Acceptance Criteria

The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.05c is specified in 10 CFR 73.55(i)(4)(i), as presented below.

10 CFR 73.55(i)(4)(i) specifies:

"Both alarm stations required by paragraph (i)(2) of this section must be designed and equipped to ensure that a single act, in accordance with the design basis threat of radiological sabotage defined in § 73.1(a)(1), cannot disable both alarm stations. The licensee shall ensure the survivability of at least one alarm station to maintain the ability to perform the following functions:

(A) Detect and assess alarms;

(B) Initiate and coordinate an adequate response to an alarm;

(C) Summon offsite assistance; and

(D) Provide command and control."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) for VEGP Unit 3 ITAAC 2.6.09.05c (Index No. 646) was submitted by SNC Letter ND-21-0271 on February 18, 2022 [ML22A049A543]. The ICN identified the following ITAAC determination basis for this ITAAC:

The Vogtle Site CAS & SAS Single Act Assessment (Reference 3) documents that the shared Units 3 and 4 CAS and SAS are designed and equipped to ensure that a single act, in accordance with the design basis threat of radiological sabotage (DBT), cannot disable both alarm stations. The assessment demonstrates that at least one alarm

station maintains the ability to detect and assess alarms, initiate and coordinate an adequate response to an alarm, summon offsite assistance, and provide command and control. Additionally, a site-specific assessment confirmed that no single act, in accordance with the design basis threat of radiological sabotage, can disable the function of both CAS and SAS as required by 10 CFR 73.55(i)(4)(i).

Supplemental information regarding this assessment describes (1) the inspection and/or analysis that document the survivability of the alarm stations (per ITAAC Index No. 644); (2) the test and inspection that demonstrate the capability to detect and assess alarms (per ITAAC Index No. 661); (3) that penetrations and openings through the protected area barrier will be secured and monitored (per ITAAC Index No. 646); (4) the determination that there are no unattended openings that intersect the protected area boundary that were a potentially transferable to either the interior of the protected area boundary or to the interior of a Vital Area boundary; and (5) tests performed to demonstrate the capabilities of the communication systems (per ITAAC Index No. 652).

References

1. Not used.
2. Not used.
3. SV0-SES-Z0C-800000, Vogtle Site CAS and SAS Single Act Assessment, Rev 0, (Security Related Information)
4. SV3-SES-ITR-800646, SES Alarm Stations Single Act Survivability: ITAAC 2.6.09.05c, Rev 0, (Security Related Information)
5. 2.6.09.05c-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD report (Reference 4) that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD and associated references, which are withheld from public disclosure as Safeguards Information (SGI) or SRI in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.05c Completion Package (Reference 5). The Notification of the NRC's determination that the ITAAC was successfully completed and published in the Federal Register (provide FRN citation).[2]

Basis for Removing Unit 4 ITAAC 2.6.09.05c (Index #646)

This ITAAC verifies that the central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and

[2] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

communicate with onsite and offsite response personnel. The CAS and SAS are structures that are common to both Vogtle Units 3 and 4, and the equipment contained within these structures are also perform common security functions.

The testing and analysis conducted to confirm the survivability of CAS and SAS for Unit 3 applies equally to Unit 4, and therefore, the proposed change to remove Unit 4 ITAAC 2.6.09.05c from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC 2.6.09.05c to the corresponding Unit 4 ITAAC.

VEGP Unit 4 ITAAC 2.6.09.06 (Index No. 647), SES Vehicle Barrier System

ITAAC 2.6.09.06 (647) consists of a single element, identified as item 6, as follows:

Design Commitment

6. The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs.

Inspections, Tests, Analyses

Inspections and analysis will be performed for the vehicle barrier system.

Acceptance Criteria

The vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the system.

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.06 is specified in 10 CFR 73.55(e)(10)(i)(A), as presented below.

10 CFR 73.55(e)(10)(i)(A) specifies:

"Licensees shall:

(A) Design, construct, install, and maintain a vehicle barrier system, to include passive and active barriers, at a stand-off distance adequate to protect personnel, equipment, and systems necessary to prevent significant core damage and spent fuel sabotage against the effects of the design basis threat of radiological sabotage land vehicle bomb assault."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) for VEGP Unit 3 ITAAC 2.6.09.06 (Index No.647) was submitted by SNC Letter ND-22-0104 on February 18, 2022 [ML22049A071]. The ICN identified the following ITAAC determination basis for this ITAAC:

"The design, construction, and installation of the VBS is based upon analyses of the minimum safe stand-off distance (MSSD) required to provide adequate protection of the personnel, equipment, and systems necessary to prevent significant core damage and spent fuel pool sabotage against the effects of the DBT of radiological sabotage land vehicle bomb assault. The Unit 3 MSSD is established by standard plant analysis … as supplemented by site specific MSSD analyses … Site specific VBS analysis … and mobile bullet resistant enclosure (MBRE) blast analyses … provide additional analysis details which further demonstrate the requirements of 10CFR 73.55(e)(10) are met."

The ITAAC technical report (Reference 1) for Unit 3 ITAAC Index No. 647 documents the inspections and analyses performed to confirm the VBS is installed at stopping distances equal to or greater than the MSSDs established by analyses. The inspection also confirmed that the as-built VBS installation is consistent with the VBS design and

installation analyses assumptions described in the referenced calculations and analyses.

The VBS DBT inspection and analysis results are documented in the PCD report and supporting documents for this ITAAC and confirm the vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the VBS.

References

1. SV3-SES-ITR-800647, Unit 3 ITAAC 647 Vehicle Barrier System Inspection: ITAAC 2.6.09.06, Rev 1 (Security-Related Information)
2. 2.6.09.06-U3-CP-Rev1, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD report (Reference 1) that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD and the supporting analyses and calculations, which are withheld from public disclosure as either Safeguards Information in accordance with 10 CFR 73.21 or Security-Related Information in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.06 Completion Package (Reference 2). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[3]

Basis for Removing Unit 4 ITAAC 2.6.09.06 (Index #647)

This ITAAC verifies that the vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the system.

Placeholder for discussing the basis for removing Unit 4 ITAAC 2.6.09.06.

[3] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

VEGP Unit 4 ITAAC 2.6.09.08 (Index No. 650), SES Isolation Zones - Illumination

ITAAC 2.6.09.05c (650) consists of a single element, identified as item 8, as follows:

Design Commitment

8. Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles.

Inspections, Tests, Analyses

Inspection of the illumination in the isolation zones and external areas of the protected area will be performed.

Acceptance Criteria

The illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation.

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.08. is specified in 10 CFR 73.55(i)(6)(ii), as presented below.

10 CFR 73.55(e)(7)(i)(C) specifies:

"The licensee shall provide a minimum illumination level of 0.2 foot-candles, measured horizontally at ground level, in the isolation zones and appropriate exterior areas within the protected area. Alternatively, the licensee may augment the facility illumination system by means of low-light technology to meet the requirements of this section or otherwise implement the protective strategy."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) for VEGP Unit 3 ITAAC 2.6.09.08 (Index No. 650) was submitted by SNC Letter ND-22-0103 on February 16, 2022 [ML22047A294]. The ICN identified the following ITAAC determination basis for this ITAAC:

"An inspection was performed to verify the Vogtle Electric Generating Plant (VEGP) Unit 3 isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles. The inspection confirms the illumination in isolation zones and external areas within the protected area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation, and satisfy the applicable illumination requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10CFR 73.55(i)(6)(ii).

ITAAC Technical Report SV3-SES-ITR-800650 (Reference 1) documents the measurements taken of the illumination in isolation zones and exterior areas within the protected area. **[Security-Related Information Insert #1**

]

The VEGP Unit 3 isolation zones and exterior areas of the protected area were divided into grid sections. Measurement of illumination levels in each section were taken at locations as determined in Reference 1. Criteria for selection of the measurement locations in each section included points on the extreme boundary of the section being measured, midpoints between the outdoor security lighting luminaries, corners at the intersection of exterior building walls, isolation zone corners, exterior area access doors to vital areas, and other exterior areas within the protected area and isolation zone areas of apparent low light within the section.

The results of the Unit 3 isolation zone and protected area lighting system inspection are documented in Reference 1 and confirm that the illumination in isolation zones and exterior areas within the protected area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation of abnormal presence or activity of persons or vehicles, utilizing low-light technologies referenced in the VEGP Unit 3 and Unit 4 Physical Security Plan."

References

1. SV3-SES-ITR-800650, SES Isolation Zone and Protected Area Illumination: ITAAC 2.6.09.08 (Security Related Information)
2. 2.6.09.08-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD inspection report that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD report, which is withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.08 Completion Package. The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[4]

Basis for Removing Unit 4 ITAAC 2.6.09.08 (Index #650)

This ITAAC verifies that the illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation. The security lighting system for Units 3 and 4 were designed, procured, and fabricated concurrently, using common procedures, specifications,

[4] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

design and configuration control practices, and quality requirements. Installation of the Unit 4 security lighting system was performed by the same construction organization as was used for Unit 3, and testing/inspection was performed using the same procedures and acceptance criteria as was used to verify the acceptability of the Unit 3 security lighting per the Unit 3 ICN. The Unit 4 security lighting is essentially just an extension of the lighting that was installed, inspected, and verified to be acceptable for Unit 3.

Therefore, the proposed change to remove Unit 4 ITAAC 2.6.09.08 from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC 2.6.09.08 to the corresponding Unit 4 ITAAC.

VEGP Unit 4 ITAAC 2.6.09.13a (Index No. 652), SES Conventional Telephone Service

ITAAC 2.6.09.13a (652) consists of two elements, identified as items 13.a) and 13.b), as follows:

Design Commitment

13.a) The central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities.

13.b) The central and secondary alarm stations are capable of continuous communication with security personnel.

Inspections, Tests, Analyses

Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' conventional telephone services will be performed.

Acceptance Criteria

13.a) The central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.

13.b) The central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event.

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.13a. is specified in 10 CFR 73.55(j)(3) and 10 CFR 73.55(j)(4), as presented below.

10 CFR 73.55(j)(3) specifies:

"All on-duty security force personnel shall be capable of maintaining continuous communication with an individual in each alarm station, and vehicle escorts shall maintain continuous communication with security personnel. All personnel escorts shall maintain timely communication with the security personnel."

10 CFR 73.55(j)(4) specifies:

"The following continuous communication capabilities must terminate in both alarm stations required by this section:

(i) Radio or microwave transmitted two-way voice communication, either directly or through an intermediary, in addition to conventional telephone service between local law enforcement authorities and the site.

(ii) A system for communication with the control room."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) for VEGP Unit 3 ITAAC 2.6.09.13a (Index No. 652) was submitted by SNC Letter ND-22-0051 on February 16, 2022 [ML22047A313].

The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 13.a):

> "The communications test between the CAS/SAS and the Unit 3 main control room was conducted by making a phone call using a conventional (landline) telephone from the CAS/SAS to the Unit 3 main control room and confirming verification of voice transmission and reception between the CAS/SAS and the Unit 3 main control room.
>
> The communications test between the CAS/SAS and the local law enforcement authorities was conducted by making a phone call using a conventional (landline) telephone from the CAS/SAS to the local law enforcement authorities listed in [the VEGP procedure] and confirming verification of voice transmission and reception between the CAS/SAS and the local law enforcement authorities."

The results of the above testing for element 13.a) are documented in the associated PCD report for this ITAAC and verify that the central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.

The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 13.b):

> "The continuous communications test between the CAS/SAS and security officers, watchmen, armed response individuals, or security personnel that have responsibilities during a contingency event was conducted using continuous communications testing methods similar to those identified in the security radio and communications system procedure. The continuous communications methods used at VEGP Unit 3 include portable Ultrahigh Frequency (UHF) primary security radios, portable Very High Frequency (VHF) radios, and security intercom communication stations.
>
> Portable UHF security radio testing was conducted between the CAS/SAS and security officers at locations similar to those that would be accessed by security officers and watchmen performing duties required by the VEGP Unit 3 and Unit 4 Physical Security Plan. Portable VHF radio testing was also conducted between the CAS/SAS and security officers. Intercom communication station testing was conducted between CAS/SAS and security officers at the local intercom communication stations located in VEGP Unit 3. The testing contacts and confirms voice transmission and reception between the CAS/SAS and a security officer assigned a portable UHF security radio, a security officer assigned a VHF radio, and each intercom system station located in VEGP Unit 3. Armed response individuals and security personnel that would have responsibilities during a contingency event utilize the applicable portable UHF security radios, VHF radios, and intercom communication stations tested above."

The results of the above testing for element 13.b) are documented in the associated PCD report for this ITAAC and verify that the central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response Individuals, or any security personnel that have responsibilities during a contingency event.

The basis for the Unit 3 ICN is provided in a PCD test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD, which is withheld from public disclosure as Security-Related Information in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.13a Completion Package. The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[5]

Basis for Removing Unit 4 ITAAC 2.6.09.13a (Index No. 652)

This ITAAC verifies that the central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities and are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event. The CAS and SAS are structures that are common to both Vogtle Units 3 and 4, and the equipment contained within these structures also perform common security functions.

The testing conducted to confirm the and capabilities of the common communications systems for Unit 3 applies equally to Unit 4, and therefore, the proposed change to remove Unit 4 ITAAC 2.6.09.13a from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC 2.6.09.13a to the corresponding Unit 4 ITAAC.

[5] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

VEGP Unit 4 ITAAC 2.6.09.13c (Index No. 654), SES Alarm Stations Non-Portable Communications – Independent Power Supply

ITAAC 2.6.09.13c (654) consists of a single element, identified as item 13.c), as follows:

Design Commitment

13.c) Non-portable communication equipment in the central and secondary alarm stations remains operable from an independent power source in the event of loss of normal power.

Inspections, Tests, Analyses

Tests, inspections, or a combination of tests and inspections of the non-portable communications equipment will be performed.

Acceptance Criteria

Non-portable communication devices (including conventional telephone systems) in the central and secondary alarm stations are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power.

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.13c. is specified in 10 CFR 73.55(j)(5), as presented below.

10 CFR 73.55(j)(5) specifies:

"Non-portable communications equipment must remain operable from independent power sources in the event of the loss of normal power."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) for VEGP Unit 3 ITAAC 2.6.09.13c (Index No. 654) was submitted by SNC Letter ND-22-0049 on January 21, 2022 [ML22021B571]. The ICN identified the following testing that was performed to provide the ITAAC determination basis for this ITAAC:

"Testing was performed per [the PCD test report] and involved securing the normal power supply to the CAS and SAS non-portable communication devices, and then verifying that the power supply to the CAS and SAS non-portable communication devices transfers to an independent power supply such that the associated system remains operable in the event of loss of normal power. The non-portable communication devices included in the scope of this testing include the CAS/SAS conventional (dedicated) telephone, CAS/SAS security base station radio and CAS/SAS security intercom station."

The testing documented in the ITAAC Index No. 654 testing report confirms that the non-portable communication devices (including conventional telephone systems) in the Unit 3 CAS and SAS are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power.

The basis for the Unit 3 ICN is provided in a PCD test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD and the plant security system database, which are withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.13c Completion Package. The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[6]

Basis for Removing Unit 4 ITAAC 2.6.09.13c (Index No. 654)

This ITAAC verifies that non-portable communication devices (including conventional telephone systems) in the central and secondary alarm stations are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power. The CAS and SAS are structures that are common to both Vogtle Units 3 and 4, as are the non-portable communication devices and their power supply.

The testing conducted to confirm the capabilities of the common non-portable communication devices for Unit 3 applies equally to Unit 4, and therefore, the proposed change to remove Unit 4 ITAAC 2.6.09.13c from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC 2.6.09.13c to the corresponding Unit 4 ITAAC.

[6] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

VEGP Unit 4 ITAAC 2.6.09.15a. (Index No. 655), SES Alarm Devices-Tamper Indicating and Self-Checking

ITAAC 2.6.09.15a (655) consists of two elements, identified as items 15.a) and 16, as follows:

Design Commitment

15.a) Security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location.

16. Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Inspections, Tests, Analyses

15.a) A test will be performed to verify that security alarms, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

16. Test, analysis, or a combination of test and analysis will be performed to ensure that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Acceptance Criteria

15.a) A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.

16. A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

Regulatory Basis

The regulatory basis for ITAAC 2.6.09.15a is specified in 10 CFR 73.55(i)(3)(ii), (iii), (iv), and (v) and 10 CFR 73.70(f), as presented below.

10 CFR 73.55(i)(3)(ii) specifies:

"The licensee's intrusion detection and assessment systems must be designed to:

(ii) Provide a visual display from which assessment of the detected activity can be made."

10 CFR 73.55(i)(3)(iii) specifies:

"(iii) Ensure that annunciation of an alarm indicates the type and location of the alarm."

10 CFR 73.55(i)(3)(iv) specifies:

"(iv) Ensure that alarm devices to include transmission lines to annunciators are tamper indicating and self-checking."

10 CFR 73.55(i)(3)(v) specifies:

"(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 backup power supply."

10 CFR 73.70(f) specifies:

"A record at each onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication that identifies the type of alarm, location, alarm circuit, date, and time. In addition, details of response by facility guards and watchmen to each alarm, intrusion, or other security incident shall be recorded. The license shall retain each record for three years after the record is made."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC 2.6.09.15a (Index No. 655) was submitted by SNC Letter ND-22-0052 on January 27, 2022 [ML22027A663].

The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 15.a):

"Testing of the security computer system was performed to verify that Unit 3 security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that CAS and SAS alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location, and satisfies the applicable security alarm device and alarm annunciation requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i)(3).

Testing was performed as described in [the PCD test report] for the Unit 3 security alarm devices identified in the Vogtle Plant Security System Database, including the associated security alarm device transmission lines, to confirm the security alarm devices are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power), and that CAS and SAS alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location. Specifically, the test documentation described in [the PCD test report]:

Tests each of the tamper indication security devices identified in [the database] by initiating a tamper signal at the tamper indication device and confirming that the

resulting CAS and SAS alarm annunciation indicates the type of alarm (tamper) and its location.

Tests the self-checking function of the security alarm system by failing the security alarm system signal connectivity to the security alarm annunciators in each of the security alarm system transmission lines, causing a failure signal for each security alarm device identified in [the database], and by supplying power to the security alarm system from a standby source of power; and confirming that a self-checking automatic indication is provided in CAS and SAS when failure of the security alarm system or component occurs, or when the security alarm system is supplied power from a standby power source.

Tests each of the security alarm devices identified in [the database] by initiating a security device alarm signal and confirming that the resulting CAS and SAS alarm annunciation indicates the type of alarm and its location.

The test results are summarized as a report in [the PCD test report] and conclude that Unit 3 security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location."

The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 16:

"Testing of the security computer system was performed to verify that the security computer system security alarm recording equipment is capable of recording each Unit 3 onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time, and satisfy the applicable onsite alarm annunciation recording requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.70(f).

Testing was performed as described in [the PCD test report] for the Unit 3 security computer system security alarm recording equipment by initiating an alarm signal for each of the security alarm devices identified in the [the database] and confirming that, for each alarm signal, the security computer system records the security alarm annunciation including location of the alarm, type of alarm (including tamper indication alarms), alarm circuit, date, and time. [The PCD test report] also confirmed that a false alarm cause code (e.g., nuisance) or alarm check code (e.g., operational test) can be recorded in the alarm summary or event summary record.

The test results are summarized as a report in [the PCD test report] and conclude that Unit 3 security computer system security alarm recording equipment is capable of recording each Unit 3 onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time."

The basis for the Unit 3 ICN is provided in a PCD test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD and the plant security system database, which are withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.15a Completion Package. The Notification of the NRC's determination

that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[7]

Basis for Removing Unit 4 ITAAC 2.6.09.15a (Index No. 655)

This ITAAC verifies that:

- Security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.
- Equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

This ITAAC verifies the functionality of the security computer and the various security alarm devices, including transmission lines, that sense and transmit signals to the security computer and its annunciators.

The security computer is common to Vogtle Units 3 and 4 (as well as Units 1 and 2), and as such, the security alarm annunciation testing that was performed to confirm visual displays and audible annunciation of alarms, including the type of alarm, location, alarm circuit, date and time of the alarm for Unit 3 is also considered verification of the computer's functionality for Unit 4. Further, the ITAAC testing for Unit 3 to verify the capability of the physical security system equipment to record each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date and time, apply to the common security computer, and are also considered verification of the computer's functionality for Unit 4.

The security alarm sensing devices and transmission lines from the sensing devices to the security computer are mostly unit-specific commodities, with the exception of sensors serving common access points (such as SAS/CAS doors). These devices, including transmission lines to annunciators, are tested individually upon installation using the testing computer, prior to making the connection to the security computer. Further, the alarm devices and transmission lines are designed, procured, manufactured, installed, and tested in accordance with the same procedures and specifications for both Units 3 and 4. In reality, the aspects of a security alarm system that would be verified by a Unit 4 ITAAC is essentially an extension of the security alarm and annunciation system that was installed, inspected, and verified to be acceptable for Unit 3.

In conclusion, the testing required to confirm that the Unit 4 security alarm system, including alarm devices and transmission lines, is constructed as designed was either satisfied by shared system testing for the corresponding Unit 3 ITAAC or will be satisfied in accordance with 10 CFR 73.55(a)(4), including 10 CFR 73.55(i)(3)(ii) through (v) and 10 CFR 73.70(f), by construction and installation tests during installation of the system. Therefore, the request

[7] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

to remove Unit 4 ITAAC 2.6.09.15a from Plant-Specific Tier 1 and Unit 4 COL Appendix C is justified from both a technical and regulatory perspective.

VEGP Unit 4 ITAAC C.2.6.09.02 (Index No. 659), Protected Area Barrier Requirements

ITAAC C.2.6.09.02 (659) consists of a single element, identified as item 2, as follows:

Design Commitment

2. Physical barriers for the protected area perimeter are not part of vital area barriers.

Inspections, Tests, Analyses

An inspection of the protected area perimeter barrier will be performed.

Acceptance Criteria

Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.02 is specified in 10 CFR 73.55(e)(8)(i)(C), as presented below.

10 CFR 73.55(e)(8)(i)(C) specifies:

"The protected area perimeter must be protected by physical barriers that are designed and constructed to:

(C) Be separated from any other barrier designated as a vital area physical barrier, unless otherwise identified in the Physical Security Plan."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.02 (Index No.659) was submitted by SNC Letter ND-20-0913 on August 11, 2020 [ML20224A159]. The ICN identified the following ITAAC determination basis for this ITAAC:

"An inspection of the VEGP Unit 3 protected area perimeter barrier was performed to verify that physical barriers at the perimeter of the Unit 3 protected area are separated from any other Unit 3 barrier designated as a vital area barrier and satisfy the applicable protected area perimeter physical barrier physical separation requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(i)(C) ...

The inspection was performed per Principal Closure Document SV3-SES-ITR-800659 (Reference 1) and involved a review of approved construction drawings and performance of a walkdown to verify that the Unit 3 protected area perimeter physical barriers are physically separated from Unit 3 vital area barriers.

The results of the inspection are documented in Reference 1 and verify that the Unit 3 physical barriers at the perimeter of the protected area are separated from any other Unit 3 barrier designated as a vital area barrier."

References

1. SV3-SES-ITR-800659, Rev. 0, "Unit 3 ITAAC 659 Walkdown Inspection: ITAAC C.2.6.09.02"
2. C.2.6.09.02-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD report that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD, which is withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.02 Completion Package (Reference 2). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (85*FR67017*).

Basis for Removing Unit 4 ITAAC C.2.6.09.02 (Index #659)

This ITAAC verifies that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.

The inspections that were performed in support of Unit 3 ITAAC C.2.6.09.02 were based on the contiguous protected area perimeter configuration with consideration of the Transitional Security Measures (TSM) which circumscribes VEGP Units 1 through 3, as described in License Amendment Request (LAR) 18-008, "Physical Security Plan, Appendix E Additions for Unit 3 Transitional Security Measures and Unit 4 Plant-Specific Emergency Planning ITAAC Revision," and approved as Amendment Nos. 160 and 158 for VEGP Units 3 and 4, respectively [ML19092A449].

The Unit 4 ITAAC C.2.6.09.02 inspection would be based on the permanent contiguous protected area perimeter configuration, which circumscribes VEGP Units 1 through 4. Much of the perimeter barrier system was already inspected by the Unit 3 ITAAC inspection, because it is part of the common contiguous perimeter barrier and due to its proximity to structures that are shared between Units 3 and 4 (e.g., Communications Support Center and Personnel Access Point. Furthermore, the protected area perimeter barriers are designed, constructed, and inspected in accordance with the same procedures and specifications for both Units 3 and 4, and like other security systems, the perimeter barrier for Unit 4 is essentially an extension of the protected area perimeter barriers that were installed, inspected, and verified to be acceptable for Unit 3 ITAAC C.2.6.09.02.

In conclusion, the inspection required to confirm that the Unit 4 protected area perimeter barriers, is constructed as designed was either satisfied by shared system testing for the corresponding Unit 3 ITAAC or will be satisfied in accordance with inspections to verify conformance with 10 CFR 73.55(a)(4), including 10 CFR 73.55(e)(8)(i)(C). Therefore, the request to remove Unit 4 ITAAC C.2.6.09.02 from Plant-Specific Tier 1 and Unit 4 COL Appendix C is justified from both a technical and regulatory perspective.

VEGP Unit 4 ITAAC C.2.6.09.03a (Index No. 660), Isolation Zone Requirements

ITAAC C.2.6.09.03a (660) consists of a single element, identified as item 3.a), as follows:

Design Commitment

3.a) Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allows 20 feet of observation on either side of the barrier. Where permanent buildings do not allow a 20-foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier.

Inspections, Tests, Analyses

Inspections will be performed of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area.

Acceptance Criteria

Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.03a is specified in 10 CFR 73.55(e)(7)(i) and 10 CFR 73.55(e)(8)(iv), as presented below.

10 CFR 73.55(e)(7)(i)(A) specifies:

"An isolation zone must be maintained in outdoor areas adjacent to the protected area perimeter barrier. The isolation zone shall be:

(A) Designed and of sufficient size to permit observation and assessment of activities on either side of the protected area barrier;

10 CFR 73.55(e)(8)(iv) specifies:

"Where building walls or roofs comprise a portion of the protected area perimeter barrier, an isolation zone is not necessary provided that the detection and, assessment requirements of this section are met, appropriate barriers are installed, and the area is described in the security plans."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.03a (Index No.660) was submitted by SNC Letter ND-21-0926 on October 21, 2021 [ML21294A362]. The ICN identified the following ITAAC determination basis for this ITAAC:

"An inspection of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area was performed to verify that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of

the barrier and satisfy the applicable protected area perimeter physical barrier isolation zone requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(7)(i)(A) …

Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply. In the case of VEGP Unit 3 a point on both the Personnel Access Point (Building 304) east and west exterior walls intersects and is immediately adjacent to the protected area perimeter physical barrier. The protected area perimeter physical boundary continues through the inside of Building 304 between the building's east and west exterior walls and is monitored with intrusion detection. The Building 304 roof is monitored by a perimeter intrusion detection system and security cameras and is only accessible from inside the protected area. Following protected area declaration, the interior of Building 304 will be monitored by security cameras and a continuously manned Bullet Resisting Enclosure. Building 304 is the personnel access control portal to the VEGP Unit 3 protected area. There are no other permanent buildings at VEGP Unit 3 that are immediately adjacent to, or an integral part of, the VEGP Unit 3 protected area perimeter physical barrier.

An inspection was performed as described in [a PCD report] and measured, using a commercially available measuring device, the isolation zone observation and assessment distance in outdoor areas that are adjacent to either side of the protected area perimeter physical barrier. The measurements verified that a minimum 20-foot observation and assessment distance exists on either side of the protected area perimeter physical barrier. The inspection also visually confirmed that the isolation zone observation and assessment distances measured above are clear of objects which could conceal or shield the activities of people on either side of the protected area perimeter physical barrier. Lastly, the inspection visually verified that the Building 304 east and west exterior walls intersect, and are immediately adjacent to, the protected area perimeter physical barrier.

The results of the inspection are documented in [a PCD report] and verify that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area the inspection results verify that the building walls are immediately adjacent to, or an integral part of, the protected area barrier."

The basis for the Unit 3 ICN is provided in a PCD report that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD, which is withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.03a Completion Package. The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (87*FR*5866).

Basis for Removing Unit 4 ITAAC C.2.6.09.03a (Index #660)

This ITAAC verifies that Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply.

Placeholder for discussing the basis for removing Unit 4 ITAAC 2.6.09.03a.

VEGP Unit 4 ITAAC C.2.6.09.03b (Index No. 661), Isolation Zone Intrusion Detection Equipment

ITAAC C.2.6.09.03b (661) consists of multiple elements, identified as items 3.b), 4.a), and 4.b), as follows:

Design Commitment

3.b) The isolation zones are monitored with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

4. The intrusion detection and assessment equipment at the protected area perimeter:

   a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in both the Central Alarm Station and Secondary Alarm Station;

   b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

Inspections, Tests, Analyses

3.b) Inspections will be performed of the intrusion detection equipment within the isolation zones.

4. a) Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.

   b) Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed

Acceptance Criteria

3.b) The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

4. The intrusion detection and assessment equipment at the protected area perimeter:

   a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station;

   b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.03b is specified in 10 CFR 73.55(e)(7)(i)(B), 10 CFR 73.55(i)(1), 10 CFR 73.55(i)(2), and 10 CFR 73.55(i)(3)(vii), as presented below.

10 CFR 73.55(e)(7)(i)(B) specifies:

"An isolation zone must be maintained in outdoor areas adjacent to the protected area perimeter barrier. The isolation zone shall be:

(B) Monitored with intrusion detection equipment designed to satisfy the requirements of § 73.55(i) and be capable of detecting both attempted and actual penetration of the protected area perimeter barrier before completed penetration of the protected area perimeter barrier; and

10 CFR 73.55(i)(1) specifies:

"The licensee shall establish and maintain intrusion detection and assessment systems that satisfy the design requirements of § 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."

10 CFR 73.55(i)(2) specifies:

"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."

10 CFR 73.55(i)(3)(vii) specifies:

"The licensee's intrusion detection and assessment systems must be designed to:

(vii) 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."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.03b (Index No. 661) was submitted by SNC Letter ND-21-0886 on October 8, 2021 [ML21281A159]. The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 3.b):

"An inspection was performed as described in ITAAC Technical Report SV3-SES-ITR-800661 Reference 1) to verify that the Unit 3 protected area perimeter isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons and satisfy the applicable intrusion detection and assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

The inspection performed a walkdown of the Unit 3 protected area perimeter isolation zones to confirm that the protected area perimeter isolation zones are equipped with intrusion detection equipment that is installed per approved construction drawings and provides the capability to detect and assess unauthorized persons.

The inspection results are documented in Reference 1 and verify that the Unit 3 protected area perimeter isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 4.a):

> "Testing was performed as identified in [a PCD intrusion detection/video assessment test report] to verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the CAS and SAS and satisfy the applicable intrusion detection and assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).
>
> The testing identified in [this PCD test report] tested each segment of the Unit 3 protected area perimeter intrusion detection system by crossing or disturbing the zone of detection and confirming that concurrent intrusion detection alarms are received in both the CAS and SAS. The tests then confirmed that for each intrusion detection system alarm the security video system could provide video image recording with real-time display of video images and playback of recorded video images for assessment to both CAS and SAS.
>
> The test results are documented in [this PCD test report] and verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station.

The ICN identified the following testing that was performed to provide the ITAAC determination basis for element 4.b):

> "Testing was performed as identified in [a PCD uninterruptible power supply (UPS) test report] to verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter remained operable from an uninterruptible power supply in the event of the loss of normal power and satisfy the applicable intrusion detection and assessment power supply requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).
>
> The testing identified in [the PCD test report for the UPS] involved securing the assigned normal power supply to Unit 3 intrusion detection and assessment equipment at the protected area perimeter and verifying that the protected area perimeter intrusion detection and assessment equipment remained powered from the credited uninterruptible power supply, such that the affected intrusion detection and assessment equipment remained operable.
>
> The test results are documented in [the PCD test report for the UPS] and verify that the Intrusion detection and assessment equipment at the Unit 3 protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

The basis for the Unit 3 ICN is provided in PCD reports that provide the background, testing and inspection methodology, testing and inspection results, and references to support ITAAC closure. The PCD reports, which are withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.03b Completion Package. The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (87*FR*5866).

Basis for Removing Unit 4 ITAAC C.2.6.09.03b (Index #661)

This ITAAC verifies that the isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons. The ITAAC also verifies that the intrusion detection and assessment equipment at the protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station and remains operable from an uninterruptible power supply in the event of the loss of normal power.

This ITAAC involves inspection to verify the isolation zones are equipped with intrusion detection equipment, a test to verify the functionality of the intrusion alarms in the CAS and SAS, and a test to verify the functionality of the UPS for the intrusion detection system.

The security computer is common to Vogtle Units 3 and 4 (as well as Units 1 and 2), and as such, the intrusion detection and assessment system testing that was performed to confirm the detection and alarm functions in the CAS and SAS for Unit 3 is also considered verification of the computer's functionality for Unit 4. Further, the ITAAC testing for Unit 3 to verify the capability of the security video system to provide video image recording with real-time display of video images and playback of recorded video images for assessment to both the CAS and SAS is also considered verification of the same computer's functionality for Unit 4.

Placeholder for completing the discussion regarding the basis for removing Unit 4 ITAAC 2.6.09.03b.

VEGP Unit 4 ITAAC C.2.6.09.05a (Index No. 664)

ITAAC C.2.6.09.05a (664) consists of two elements, identified as items 5.a) and 5.b), as follows:

Design Commitment

5. Access control points are established to:
   a) control personnel and vehicle access into the protected area.
   b) detect firearms, explosives, and incendiary devices at the protected area personnel access points.

Inspections, Tests, Analyses

Tests, inspections, or combination of tests and inspections of installed systems and equipment at the access control points to the protected area will be performed.

Acceptance Criteria

5. The access control points for the protected area:
   a) are configured to control personnel and vehicle access.
   b) include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.05a is specified in 10 CFR 73.55(g)(1) and 10 CFR 73.55(h)(3)(i), as presented below.

10 CFR 73.55(g)(1) specifies:

"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 § 73.55(b).

(i) To accomplish this, the licensee shall:

(A) Locate access control portals outside of, or concurrent with, the physical barrier system through which it controls access.

(B) Equip access control portals with locking devices, intrusion detection equipment, and surveillance equipment consistent with the intended function.

(C) Provide supervision and control over the badging process to prevent unauthorized bypass of access control equipment located at or outside of the protected area.

(D) Limit unescorted access to the protected area and vital areas, during non-emergency conditions, to only those individuals who require unescorted access to perform assigned duties and responsibilities.

(E) Assign an individual the responsibility for the last access control function (controlling admission to the protected area) and isolate the individual within a

bullet-resisting structure to assure the ability of the individual to respond or summon assistance.

(ii) Where vehicle barriers are established, the licensee shall:

(A) Physically control vehicle barrier portals to ensure only authorized vehicles are granted access through the barrier.

(B) Search vehicles and materials for contraband or other items which could be used to commit radiological sabotage in accordance with paragraph (h) of this section.

(C) Observe search functions to ensure a response can be initiated if needed."

10 CFR 73.55(h)(3)(i) specifies:

"The search for firearms, explosives, incendiary devices, or other items which could be used to commit radiological sabotage shall be accomplished through the use of equipment capable of detecting these items, or through visual and physical searches, or both, to ensure that all items are clearly identified before granting access to protected areas. The licensee shall subject all persons except official Federal, state, and local law enforcement personnel on official duty to these searches upon entry to the protected area. Armed security officers who are on duty and have exited the protected area may re-enter the protected area without being searched for firearms."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.05a (Index No. 664) was submitted by SNC Letter ND-21-0715 on August 3, 2021 [ML21215A572].

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 5.a):

"An inspection was performed to confirm that protected area personnel and vehicle access control points are installed per approved construction drawings and to ensure the access control points are configured to control personnel and vehicle access per the applicable personnel and vehicle access control requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with [10 CFR 73.55(g)(1)].

The inspection of the protected area primary personnel access control point confirmed that personnel are channeled to the designated access control point where personnel are processed before being granted access to the protected area. The primary personnel access control point was confirmed to include: 1) a location where identity and authorization for access can be verified, 2) the ability to search equipment and personnel to verify that unauthorized items are not present prior to entry into the protected area, 3) video surveillance equipment that can be monitored by security personnel, and 4) alarmed entry control devices (e.g., doors, gates, turnstiles, card readers, or biometrics) that prevent or delay unauthorized entry into the protected area before completion of the required processing.

The inspection of the protected area primary vehicle access control point confirmed that vehicles are channeled to the designated access control point where vehicles are processed before being granted access to the protected area. The primary vehicle

access control point is confirmed to include: 1) active vehicle barriers located outside the Protected Area fence which are remotely controlled from the Central Alarm Station or Secondary Alarm Station 2) video surveillance equipment that can be monitored by security personnel, and 3) a vehicle search isolation area between the inner and outer protected area fence to search vehicles for unauthorized items. Vehicle operators are processed via the protected area primary personnel access control point described in the previous paragraph. Testing of the primary vehicle access control point active vehicle barriers was performed to demonstrate the barriers could be remotely controlled from the Central Alarm Station (CAS) or Secondary Alarm Station (SAS).

The inspection of the protected area Receiving Warehouse vehicle access control point confirmed that vehicles are channeled to a designated access control point where vehicles are processed before being granted access to the protected area. The Receiving Warehouse vehicle access control point is confirmed to include: 1) an active vehicle barrier located outside the Protected Area fence which is remotely controlled from the Central Alarm Station or Secondary Alarm Station 2) video surveillance equipment that can be monitored by security personnel, and 3) a vehicle search area between the Receiving Warehouse and the protected area perimeter fence to search vehicles for unauthorized items. Vehicle operators requiring access to the Protected Area are processed via the protected area primary personnel access control point described in the previous paragraph. Testing of the Receiving Warehouse vehicle access control point active vehicle barrier was performed to demonstrate the barrier could be remotely controlled from CAS or SAS.

The results of the protected area primary personnel and primary vehicle access control point inspections are documented in SV3-SES-ITR-800664 (Reference 1). The Receiving Warehouse vehicle access control point inspection is documented in SV3-SES-ITR-802664 (Reference 2). The results of the primary vehicle and Receiving Warehouse access control point active vehicle barrier testing is documented in SV3-SES-ITR-803664 (Reference 3). Together References 1 through 3 confirm that the protected area access control points are configured to control personnel and vehicle access.

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 5.b):

"Inspection of the primary personnel access point confirmed the access point includes a search area containing metal detectors, explosive detectors, and X-Ray devices configured to prevent unauthorized bypass, and that is capable of detecting firearms, incendiary devices, and explosives, per the applicable personnel access control requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with [10 CFR 73.55(h)(3)(i)].

Operational testing of the detection equipment was performed following installation to confirm the detection equipment is functioning and performing within design specifications. Walkthrough (portal) metal detectors are used to detect metallic components in weapons; detection of wiring, batteries, and other metallic components of bombs and incendiary devices; and detection of metals used to shield radioactive material. Portal explosive detectors are used to detect trace amounts of explosives. X-Ray imaging equipment is used to inspect the contents of hand carried items and packages for unauthorized items.

The results of the protected area personnel access point detection equipment inspections and testing are documented in SV3-SES-ITR-801664 (Reference 4) and confirm that installed equipment at the protected area personnel access point is capable of detecting firearms, incendiary devices, and explosives.

Together, these reports (References 1 through 4) provide evidence that the following ITAAC Acceptance Criteria requirements are met:

- The access control points for the protected area are configured to control personnel and vehicle access; and
- The access control points for the protected area include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points."

References

1. SV3-SES-ITR-800664, Unit 3 ITAAC 664 Walkdown Inspection: ITAAC C.2.6.09.05a, Revision 1 (SRI)
2. SV3-SES-ITR-802664, Unit 3 ITAAC 664 Receiving Warehouse Vehicle Access Walkdown Inspection: ITAAC C.2.6.09.05a, Revision 0 (SRI)
3. SV3-SES-ITR-800664, Unit 3 ITAAC 664 Walkdown Inspection: ITAAC C.2.6.09.05a, Revision 1 (SRI)
4. SV3-SES-ITR-802664, Unit 3 ITAAC 664 Receiving Warehouse Vehicle Access Walkdown Inspection: ITAAC C.2.6.09.05a, Revision 0 (SRI)
5. C.2.6.09.05a-U3-CP-Rev1, ITAAC Completion Package (SRI)

The basis for the Unit 3 ICN is provided in PCD reports that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD reports, which are withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), were made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.05a Completion Package (Reference 5). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (86*FR*50381).

Basis for Removing Unit 4 ITAAC C.2.6.09.05a (Index #664)

This ITAAC verifies that the access control points for the protected area are configured to control personnel and vehicle access and include detection equipment that is capable of detecting firearms, incendiary devices, and explosives at the protected area personnel access points.

Placeholder for discussing the basis for removing Unit 4 ITAAC C.2.6.09.05a.

VEGP Unit 4 ITAAC C.2.6.09.06 (Index No. 666)

ITAAC C.2.6.09.06 (666) consists of a single element, identified as item 6, as follows:

Design Commitment

6. An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas and vital areas without escort.

Inspections, Tests, Analyses

An access control system with numbered picture badges is installed for use by individuals who are authorized access to protected areas and vital areas without escort.

Acceptance Criteria

The access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.06 is specified in 10 CFR 73.55(g)(6)(ii), as presented below.

10 CFR 73.55(g)(6)(ii) specifies:

The licensee shall implement a numbered photo identification badge system for all individuals authorized unescorted access to the protected area and vital areas.

(A) Identification badges may be removed from the protected area only when measures are in place to confirm the true identity and authorization for unescorted access of the badge holder before allowing unescorted access to the protected area.

(B) Except where operational safety concerns require otherwise, identification badges must be clearly displayed by all individuals while inside the protected area and vital areas.

(C) The licensee shall maintain a record, to include the name and areas to which unescorted access is granted, of all individuals to whom photo identification badges have been issued.

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.06 (Index No. 666) was submitted by SNC Letter ND-20-1405 on December 22, 2020 [ML20358A147]. The ICN identified the following ITAAC determination basis for this ITAAC:

"A test of the access authorization system was performed using numbered picture test badges prepared both with and without unescorted access authorization to the protected area and vital areas. The test badges and associated biometric data were prepared and controlled per the applicable station procedures. Test badges and associated biometric data were used to attempt access to the protected area, and test badges were used to attempt access to a vital area. The test confirmed the access authorization system will

only allow access to the protected area and vital area for which the test badges are authorized. Similarly, the test confirmed the access authorization system will not allow access for test badges that do not have authorization. The testing confirmed the test badge access successes and failures are recorded by the access authorization system. The testing also confirmed the Central and Secondary Alarm Stations received alarms following multiple unauthorized test badge access attempts and provided the protected or vital area test location causing the alarm. The test procedure included a record of protected and vital area test results, as well as confirmation that the access authorization system appropriately annunciated and accurately recorded test results.

The numbered picture badge access control system test results are documented in SV3-SES-ITR-800666 (Reference 1) and confirm that the access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization to these areas."

References

1. SV3-SES-ITR-800666, Unit 3 ITAAC 666 Access Authorization Test: ITAAC C.2.6.09.06, Revision 0 (SRI)
2. C.2.6.09.06-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD test report, which is withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.06 Completion Package (Reference 2). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (86*FR*50381).

Basis for Removing Unit 4 ITAAC 2.6.09.06 (Index #666)

This ITAAC verifies that the access authorization system with numbered picture badges can identify and authorize protected area and vital area access only to those personnel with unescorted access authorization. The access control system, including protected area turnstiles, being tested by this ITAAC is common to VEGP Units 3 & 4. Additionally, VEGP Units 3 & 4 share the same Central Alarm Station, Secondary Alarm Station, primary Personnel Access Point, and security system computer used in the access control system test. Therefore, the access control system test is applicable to both VEGP Unit 3 and VEGP Unit 4.

The testing conducted to confirm the capabilities of the common access authorization system for Unit 3 applies equally to Unit 4, and therefore, the proposed change to remove Unit 4 ITAAC 2.6.09.06 from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC 2.6.09.06 to the corresponding Unit 4 ITAAC.

VEGP Unit 4 ITAAC C.2.6.09.07 (Index No. 667)

ITAAC C.2.6.09.07 (667) consists of multiple elements, identified as items 7, 7.a), and 7.b), as follows:

Design Commitment

7. Access to vital equipment physical barriers requires passage through the protected area perimeter barrier.

7.a) Vital equipment is located only within a vital area.

7.b) Access to vital equipment requires passage through the vital area barrier.

Inspections, Tests, Analyses

7. Inspection will be performed to confirm that access to vital equipment physical barriers requires passage through the protected area perimeter barrier.

7.a) Inspection will be performed to confirm that vital equipment is located within a vital area.

7.b) Inspection will be performed to confirm that vital equipment is located within a vital area Inspection will be performed to confirm that access to vital equipment requires passage through the vital area barrier,

Acceptance Criteria

7. Vital equipment is located within a protected area such that access to vital equipment physical barriers requires passage through the protected area perimeter barrier.

7.a) All vital equipment is located only within a vital area.

7.b) Vital equipment is located within a protected area such that access to vital equipment requires passage through the vital area barrier.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.07 is specified in 10 CFR 73.55(e)(9)(i), as presented below.

10 CFR 73.55(e)(9)(i) specifies:

> "10 CFR 73.55(e)(9)(i): Vital equipment must be located only within vital areas, which must be located within a protected area so that access to vital equipment requires passage through at least two physical barriers, except as otherwise approved by the Commission and identified in the security plans."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.07 (Index No. 667) was submitted by SNC Letter ND-22-0174 on March 14, 2022 [ML22073A263].

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 7:

"An inspection was performed per ITAAC Technical Report SV3-SES-ITR-800667 (Reference 4) to confirm that access to the Unit 3 vital equipment located in vital equipment physical barriers requires passage through the Unit 3 protected area perimeter barrier. The inspection used the Vogtle Unit 3 & 4 Vital Equipment List [Reference 2], VEGP Units 3 and 4 Physical Security Plan [Reference 3] vital area listing, approved construction drawings, and performance of walkdowns to validate that access to vital equipment located in vital equipment physical barriers (vital area barriers) requires passage through the protected area perimeter barrier. The inspection confirmed that access to the vital equipment identified in Reference 2 requires passage through at least two physical barriers, i.e., the protected area barrier and a vital area barrier.

The inspection results are documented in Reference 4 and verified that the Unit 3 vital equipment is located within a protected area such that access to vital equipment physical barriers requires passage through the protected area perimeter barrier."

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 7.a):

"An inspection was performed per Reference 4 to confirm that all Unit 3 vital equipment is located only within a Unit 3 vital area. The inspection used the Vogtle Unit 3 & 4 Vital Equipment List, VEGP Units 3 and 4 Physical Security Plan vital area listing, approved construction drawings, and performance of walkdowns to validate that all vital equipment is located only within a vital area.

The inspection results are documented in Reference 4 and verified that all Unit 3 vital equipment is located only within a vital area."

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 7.b):

"An inspection was performed per Reference 4 to confirm that all Unit 3 vital equipment located within a Unit 3 protected area such that access to vital equipment requires passage through the vital area barrier. The inspection used the Vogtle Unit 3 & 4 Vital Equipment List, VEGP Units 3 and 4 Physical Security Plan vital area listing, approved construction drawings, and performance of walkdowns to validate that vital equipment is located within a protected area such that access to vital equipment requires passage through a vital area barrier.

The inspection results are documented In Reference 4 and verified that Unit 3 vital equipment is located within a protected area such that access to vital equipment requires passage through the vital area barrier."

References

1. Not used.
2. Unit 3 & 4 Vital Equipment List, 9/7/2021, (Security Related Information)
3. VEGP Units 3 and 4 Physical Security Plan, Rev 6 (Safeguards Information)
4. SV3-SES-ITR-800667, Vital Equipment Location and Access Inspection, Rev 0 (Security Related Information)
5. C.2.6.09.07-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD report (Reference 4) that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD, which is withheld from public disclosure as Security Related Information in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.07 Completion Package (Reference 5). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[8]

Basis for Removing Unit 4 ITAAC C.2.6.09.07 (Index #667)

This ITAAC verifies that all vital equipment is located only within a vital area and that vital equipment is located within a protected area such that access to vital equipment physical barriers requires passage through the protected area perimeter barrier, and access to vital equipment requires passage through the vital area barrier. The locations of the VEGP 3&4 vital areas was established during the certification of the AP1000 design and is incorporated into the design and licensing bases for VEGP 3&4. The Vogtle Electric Generating Plant (VEGP) Units 3 and 4 COL Physical Security Plan (PSP) identifies the vital areas for VEGP Units 3 and 4. The configuration of the VEGP Units 3 and 4 vital areas and protected area was established during the facility's licensing process and is maintained throughout construction in accordance with the approved configuration control processes of the design authority and the licensee under the Quality Assurance Plans for both the licensee and the Design Authority. Further, any change to the PSP, including changes to the vital areas, vital area barriers, or protected area perimeter barriers would involve an evaluation in accordance with 10 CFR 50.54(p) to determine if the change involved a reduction in the effectiveness of the Plan. Based on the above controls, it is understood that the locations of vital equipment, vital areas, vital area barriers, and protected area perimeter barriers for Vogtle Unit 4 are consistent with those for Unit 3. Additionally, some vital areas (such as CAS and SAS) are structures that are common to both Vogtle Units 3 and 4, and as such their locations were verified by Unit 3 ITAAC 2.6.09.07.

Therefore, the inspections conducted to confirm the locations of vital equipment in relation to the vital areas, vital area barriers, and protected area perimeter barriers for Unit 3 applies equally to Unit 4, and therefore, the proposed change to remove Unit 4 ITAAC C.2.6.09.07 from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC C.2.6.09.07 to the corresponding Unit 4 ITAAC.

[8] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

VEGP Unit 4 ITAAC C.2.6.09.08a (Index No. 668)

ITAAC C.2.6.09.08a (668) consists of two elements, identified as items 8.a) and 8.b), as follows:

Design Commitment

8.a) Penetrations through the protected area barrier are secured and monitored.

8.b) Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Inspections, Tests, Analyses

8.a) Inspections will be performed of penetrations through the protected area barrier.

8.b) Inspections will be performed of unattended openings that intersect the protected area boundary or vital area boundary.

Acceptance Criteria

8.a) Penetrations and openings through the protected area barrier are secured and monitored.

8.b) Unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.08a is specified in 10 CFR 73.55(e)(8)(ii) and 10 CFR 73.55(i)(5)(iii), as presented below.

10 CFR 73.55(e)(8)(ii) specifies:

> "Penetrations through the protected area barrier must be secured and monitored in a manner that prevents or delays, and detects the exploitation of any penetration."

10 CFR 73.55(i)(5)(iii) specifies:

> "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."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.08a (Index No. 668) was submitted by SNC Letter ND-22-0175 on March 11, 2022 [ML22070B048].

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 8.a):

"A walkdown inspection was performed of the as-built protected area barrier as described in ITAAC Technical Report SV3-SES-ITR-800646 (Reference 1) to verify that the penetrations and openings through the protected area barrier are secured and monitored and satisfy the applicable protected area barrier penetration and opening requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(ii).

The inspection involved visual observation of each protected area barrier penetration and opening, that could provide unauthorized access through the protected area barrier, to confirm that the penetration or opening is secured, and monitored by intrusion detection equipment that will alert security force personnel of unauthorized access through the protected area barrier penetration or opening.

The results of the inspection are documented in Reference 1 and verify that the penetrations and openings through the protected area barrier are secured and monitored."

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for element 8.b):

"Inspections were performed to verify that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation and satisfy the applicable protected area boundary and vital area boundary unattended openings requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(i)(5)(iii).

The unattended opening protected area boundary inspection was performed as documented in ITAAC Technical Report SV3-SES-ITR-800668 (Reference 2) and involved a review of approved construction drawings and performance of walkdowns to identify unattended openings with an entry point exterior to the protected area boundary and an exit point interior to the protected area boundary that could potentially meet or exceed the **[Security-Related Information Insert #2]** criteria used to identify unattended openings that are potentially traversable pathways which could be used as exploitable entry points into the protected area. As discussed in NRC endorsed Nuclear Energy Institute (NEI) 09-05 (Reference 3), pathways with documentation that shows the pathway cannot be physically traversed by persons and/or equipment due to pathway configuration or un-survivable conditions is not considered a potentially traversable pathway. Each identified potentially traversable pathway was verified to be protected by an acceptable physical barrier, and either monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. Types of surveillance include area observation by fixed posts, closed circuit television (CCTV) by fixed posts or alarm station personnel, dedicated observer using CCTV/monitoring equipment, routine surveillance or physical inspection by roving patrols or posts, or a combination thereof.

The VEGP Unit 3 physical security design includes several vital areas that are located within a larger vital area. In cases where a specific vital area boundary is located within a larger vital area boundary, the unattended opening vital area boundary inspection and acceptance criteria are applied only to the first vital area boundary that would be encountered by an adversary. This is consistent with the requirements of

10 CFR 73.55(e)(9)(i), which require that vital equipment be located only within vital areas, which must be located within a protected area so that access to vital equipment requires passage through at least two physical barriers. For stand-alone vital areas, not located within another vital area, the inspection and acceptance criteria are applied to the stand-alone vital area boundary.

The unattended opening vital area boundary inspection was performed as documented in Reference 2 and involves a review of approved construction drawings and performance of walkdowns to identify unattended openings with an entry point exterior to the vital area boundary and an exit point interior to the vital area boundary that could potentially meet or exceed the **[Security-Related Information Insert #3]** criteria used to identify unattended openings that are potentially traversable pathways which could be used as an exploitable entry point into the vital area under review. As discussed in Reference 3, pathways with documentation that shows the pathway cannot be physically traversed by persons and/or equipment due to pathway configuration or un-survivable conditions are not considered a potentially traversable pathway. Each identified potentially traversable pathway was verified to be protected by an acceptable physical barrier, and either monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation. Types of surveillance include area observation by fixed posts, closed circuit television (CCTV) by fixed posts or alarm station personnel, dedicated observer using CCTV/monitoring equipment, routine surveillance or physical inspection by roving patrols or posts, or a combination thereof.

The results of the unattended opening inspections are documented in Reference 2 and verify that unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation."

References

1. SV3-SES-ITR-800646, SES Alarm Stations Single Act Survivability: ITAAC 2.6.09.05c, Rev 0 (Security Related Information)
2. SV3-SES-ITR-800668, Inspection of Unattended Openings Intersecting the Protected Area or Vital Area Boundaries, Rev 0 (Security Related Information)
3. NEI 09-05, Guidance on the Protection of Unattended Openings that Intersect a Security Boundary, Rev. 0 (Security Related Information)
4. C.2.6.09.08a-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in PCD reports (References 1 and 2) that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD reports, which are withheld from public disclosure as Security Related Information in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.08a Completion Package (Reference 4).

The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[9]

Basis for Removing Unit 4 ITAAC 2.6.09.08a (Index #668)

This ITAAC verifies that penetrations and openings through the protected area barrier are secured and monitored and unattended openings (such as underground pathways) that intersect the protected area boundary or vital area boundary are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.

Penetrations and openings through the protected area barrier and unattended openings that intersect the protected area boundary or vital area boundary are designed, protected, monitored, and/ or observed to the same standards and in accordance with the same procedures for both VEGP Units 3 and 4. The configuration of the VEGP Units 3 and 4 protected area barriers and vital area barriers, including penetrations and openings through such barriers, was established during the facility's licensing process and is maintained throughout construction in accordance with the approved configuration control processes of the design authority and the licensee under the Quality Assurance Plans for both the licensee and the Design Authority. Further, any change to the protected area barrier or vital area barrier, including changes that add or modify penetrations or openings through a barrier or intersecting a barrier, would involve an evaluation in accordance with 10 CFR 50.54(p) to determine if the change involved a reduction in the effectiveness of the Plan. Additionally, some protected area and vital area barriers are common to both Vogtle Units 3 and 4, and as such penetrations and openings through these barriers were verified by Unit 3 ITAAC 2.6.09.08a.

Based on the above controls, it is understood that the protection and monitoring of protected area and vital area barrier penetrations for Vogtle Unit 4 are consistent with those for Unit 3.

Therefore, the inspections conducted to verify that penetrations and openings through protected area barriers and vital area barriers are secured and monitored and unattended openings that intersect the protected area boundary or vital area boundary are adequately protected and monitored or provided surveillance for Unit 3 applies equally to Unit 4, and therefore, the proposed change to remove Unit 4 ITAAC C.2.6.09.08a from the Plant-Specific Tier 1 and Unit 4 COL Appendix C appropriately applies the reasonable assurance determination that was verified for Unit 3 ITAAC C.2.6.09.08a to the corresponding Unit 4 ITAAC.

[9] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

VEGP Unit 4 ITAAC C.2.6.09.09 (Index No. 670)

ITAAC C.2.6.09.09 (670) consists of two elements, both identified as item 9, as follows:

Design Commitment

9. Emergency exits through the protected area perimeter are alarmed and secured with locking devices to allow for emergency egress.

9. Emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

Inspections, Tests, Analyses

9. Tests, inspections, or a combination of tests and inspections of emergency exits through the protected area perimeter will be performed.

9. Test, inspection, or a combination of tests and inspections of the emergency exits through the vital area boundaries will be performed.

Acceptance Criteria

9. Emergency exits through the protected area perimeter are alarmed and secured by locking devices that allow prompt egress during an emergency.

9. The emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

Regulatory Basis

The regulatory basis for ITAAC C.2.6.09.09 is specified in 10 CFR 73.55(e)(8)(iii) and 10 CFR 73.55(e)(9)(ii), as presented below.

10 CFR 73.55(e)(8)(iii) specifies:

> "All emergency exits in the protected area must be alarmed and secured by locking devices that allow prompt egress during an emergency and satisfy the requirements of this section for access control into the protected area."

10 CFR 73.55(e)(9)(ii) specifies:

> "The licensee shall protect all vital area access portals and vital area emergency exits with intrusion detection equipment and locking devices that allow rapid egress during an emergency and satisfy the vital area entry control requirements of this section."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC C.2.6.09.09 (Index No. 670) was submitted by SNC Letter ND-21-1010 on November 18, 2021 [ML21322A248].

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for the first element 9:

> "Testing was performed as described in ITAAC Technical Report SV3-SES-ITR-800670 (Reference 1) to verify that each emergency exit portal through the protected area

perimeter is alarmed and secured by a locking device that allows prompt egress during an emergency and satisfies the applicable protected area perimeter emergency egress requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(iii).

The test for each protected area perimeter emergency exit portal first verified the protected area perimeter emergency exit portal was secured by a locking device. The protected area perimeter emergency exit portal was then unlocked by releasing the lock and opening the portal door, and then verifying that an associated alarm was generated in the central alarm station (CAS) and the secondary alarm station (SAS). Once unlocked it was confirmed that the protected area perimeter emergency exit portal allowed prompt egress. The protected area perimeter emergency exit portal was then secured by a locking device i.e., lock restored and portal door closed, and it was verified that the associated alarm in the CAS and SAS could be reset.

The results of the test are documented in Reference 1 and verify each emergency exit through the protected area perimeter is alarmed and secured by a locking device that allows prompt egress during an emergency.

The ICN identified the following inspection that was conducted to provide the ITAAC determination basis for the second element 9:

"Testing was performed as described in ITAAC Technical Report SV3-SES-ITR-800670 (Reference 1) to verify that the emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress and satisfy the applicable vital area boundary emergency egress requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10CFR 73.55(e)(9)(ii).

The test for each vital area boundary emergency exit portal first verified the vital area boundary emergency exit portal was locked. The vital area boundary emergency exit portal was then exited using the portal's crash bar, and verification made that an associated alarm was generated in the CAS and SAS. The vital area boundary emergency exit portal was then closed and locked, and verification made that the associated alarm in the CAS and SAS could be reset.

The results of the test are documented In Reference 1 and verify the emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

References

1. SV3-SES-ITR-800670, Protected Area Perimeter and Vital Area Boundary Emergency Exit Test, Rev 0 (SRI)
2. C.2.6.09.09-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD test report, which was withheld from public disclosure as Security Related Information in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.09 Completion Package (Reference 2). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (87*FR*5866).

Basis for Removing Unit 4 ITAAC C.2.6.09.09 (Index #670)

This ITAAC verifies that emergency exits through the protected area perimeter are alarmed and secured by locking devices that allow prompt egress during an emergency and emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

Placeholder for discussing the basis for removing Unit 4 ITAAC C.2.6.09.09.

VEGP Unit 4 ITAAC 3.3.00.14 (Index No. 820)

ITAAC 3.3.00.14 (820) consists of a single element, identified as item 14, as follows:

Design Commitment

14. The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

Inspections, Tests, Analyses

Type test, analysis, or a combination of type test and analysis will be performed for the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station.

Acceptance Criteria

A report exists and concludes that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

Regulatory Basis

The regulatory basis for ITAAC 3.3.00.14 is specified in, as presented below.

10 CFR 73.55(e)(5) specifies:

"Bullet Resisting Physical Barriers. The reactor control room, the central alarm station, and the location within which the last access control function for access to the protected area is performed, must be bullet-resisting."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC 3.3.00.14 (Index No. 820) was submitted by SNC Letter ND-22- on DATE TBD [ML22]. The ICN identified the following ITAAC determination basis for this ITAAC:

Provide the basis for removing U4 ITAAC 3.3.00.14, based on U3 ICN.[10]

References

[10] Unit 3 ITAAC 3.3.00.14 has not yet been closed. This section will be completed when the ICN is submitted and verified by NRC.

The basis for the Unit 3 ICN is provided in a PCD test report that provides the background, testing methodology, test results and references to support ITAAC closure. The PCD, which is withheld from public disclosure as SRI in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.14 Completion Package (Reference XX). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).

Basis for Removing Unit 4 ITAAC 3.3.00.14 (Index #820)

This ITAAC verifies that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

Placeholder for discussing the basis for removing Unit 4 ITAAC C.2.6.09.14.

VEGP Unit 4 ITAAC 3.3.00.16 (Index No. 821)

ITAAC 3.3.00.16 (821) consists of a single element, identified as item 16, as follows:

Design Commitment

16. Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area.

Inspections, Tests, Analyses

An inspection will be performed to ensure that the location of the secondary security power supply equipment for alarm annunciator equipment and non-portable communications equipment is within a vital area

Acceptance Criteria

Secondary security power supply equipment for alarm annunciator equipment and non-portable communication equipment is located within a vital area.

Regulatory Basis

The regulatory basis for ITAAC 3.3.00.16 is specified in 10 CFR 73.55(e)(9)(vi), as presented below.

10 CFR 73.55(e)(9)(vi) specifies:

"(vi) At a minimum, the following shall be located within a vital area:

(A) The secondary power supply systems for alarm annunciation equipment; and

(B) The secondary power supply systems for non-portable communications equipment."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC 3.3.00.16 (Index No. 821) was submitted by SNC Letter ND-22-0070 on February 16, 2022 [ML22047A296]. The ICN identified the following ITAAC determination basis for this ITAAC:

"An inspection of the secondary security power supply system for alarm annunciator equipment and non-portable communications equipment was performed to confirm the Vogtle Electric Generating Plant (VEGP) Unit 3 secondary security power supply equipment for alarm annunciator equipment and non-portable communication equipment is located within a vital area and satisfies the applicable secondary security power supply system location requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(9)(vi) …

The secondary security power supply equipment for alarm annunciator equipment and non-portable communications equipment is installed in accordance with approved installation specifications and drawings issued for construction. An inspection was performed to verify that the secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a

vital area. The inspection was performed as described in ITAAC Technical Report SV3-SES-ITR-800821 (Reference 1) and documented performance of visual observations to compare the installed secondary security power supply equipment locations to the approved drawings. The results of the inspection are documented in Reference 1.

Reference 1 exists, and concludes that inspections confirm that the secondary security power supply system for alarm annunciator equipment and non-portable communication equipment is located within a vital area."

References

1. SV3-SES-ITR-800821, Walkdown Inspection for Secondary Security Power Supply Locations: ITAAC 3.3.00.16, Rev 0 (SRI)
2. 3.3.00.16-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD report that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD report, which is withheld from public disclosure as Security Related Information in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.16 Completion Package (Reference 2). The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[11]

Basis for Removing Unit 4 ITAAC 3.3.00.16 (Index #821)

This ITAAC verifies that secondary security power supply equipment for alarm annunciator equipment and non-portable communication equipment is located within a vital area.

Placeholder for discussing the basis for removing Unit 4 ITAAC C.2.6.09.16.

[11] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

VEGP Unit 4 ITAAC 3.3.00.17 (Index No. 822)

ITAAC 3.3.00.17 (822) consists of a single element, identified as item 17, as follows:

Design Commitment

17. Vital areas are locked and alarmed with active intrusion detection systems that annunciate in the central and secondary alarm stations upon intrusion into a vital area.

Inspections, Tests, Analyses

An inspection of the as-built vital areas, and central and secondary alarm stations are performed.

Acceptance Criteria

Vital areas are locked and alarmed with active intrusion detection systems and intrusion is detected and annunciated in both the central and secondary alarm stations.

Regulatory Basis

The regulatory basis for ITAAC 3.3.00.17 is specified in 10 CFR 73.55(e)(9)(iii) and 10 CFR 73.55(i)(2), as presented below. ITAAC 2.6.09.05a also shares the regulatory basis of 10 CFR 73.55(i)(2), which is repeated below based on its applicability to this non-system based ITAAC.

10 CFR 73.55(e)(9)(iii) specifies:

"Unoccupied vital areas must be locked and alarmed."

10 CFR 73.55(i)(2) specifies:

"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."

Basis for Verification of Corresponding Unit 3 PS-ITAAC

The ITAAC Closure Notification (ICN) on VEGP Unit 3 ITAAC 3.3.00.17 (Index No. 822) was submitted by SNC Letter ND-21-1055 on March 11, 2022 [ML22070B126]. The ICN identified the following ITAAC determination basis for this ITAAC:

"An inspection of the as-built vital areas, and central and secondary alarm stations was performed to confirm the Vogtle Electric Generating Plant (VEGP) Unit 3 vital areas are locked and alarmed with active intrusion detection systems and intrusion is detected and annunciated in both the central alarm station (CAS) and secondary alarm station (SAS), and satisfy the applicable vital area access control requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(9)(iii) …

A walkdown inspection of the as-built vital area portals was performed as described in ITAAC Technical Report SV3-SES-ITR-800822 (Reference 1) and visually confirmed that each VEGP Unit 3 vital area portal has active intrusion detection equipment and locking devices installed per approved design specifications, and that the vital area

portal is locked. The inspection then required observation that when each vital area portal intrusion device is activated (e.g., unlocking via key, latch or crash bar and opening the portal door, etc.) the intrusion detection device actuation was detected and alarmed in both the CAS and SAS. Lastly, the inspection confirmed that each CAS and SAS intrusion detection alarm reset once the associated portal door was closed and locked.

Reference 1 confirmed that each vital area portal has active intrusion detection equipment and locking devices installed per approved design specifications and that the vital area portal is locked, intrusion detection device activation is detected and annunciated in both CAS and SAS for each vital area portal intrusion detection device, and each CAS and SAS intrusion detection alarm resets once the associated portal door is closed and locked.

References

1. SV3-SES-ITR-800822, Vital Area Portal Inspections, Rev 0 (Security Related Information)
2. 3.3.00.17-U3-CP-Rev0, ITAAC Completion Package

The basis for the Unit 3 ICN is provided in a PCD report that provides the background, inspection methodology, inspection results and references to support ITAAC closure. The PCD report, which is withheld from public disclosure as Security Related Information in accordance with 10 CFR 2.390(d), was made available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.17 Completion Package. The Notification of the NRC's determination that the ITAAC was successfully completed was published in the Federal Register (provide FRN citation).[12]

Basis for Removing Unit 4 ITAAC 3.3.00.17 (Index #822)

This ITAAC verifies that vital areas are locked and alarmed with active intrusion detection systems and intrusion is detected and annunciated in both the central and secondary alarm stations.

Placeholder for discussing the basis for removing Unit 4 ITAAC C.2.6.09.17.

[12] NOTE: Statements highlighted in gray, were not complete as of the 3/1/2022 print date for the NRC's ITAAC Status Report [ML22060A174] but are anticipated to be complete when this LAR is submitted.

3.2 REGULATORY EVALUATION

As defined in Section II of Appendix D to 10 CFR Part 52, Tier 1 information includes inspections, tests, analyses, and acceptance criteria (ITAAC) and design descriptions, among other things.

10 CFR Part 52, Appendix D, Section III.B requires a licensee referencing 10 CFR Part 52, Appendix D to incorporate by reference and comply with the requirements of Appendix D, including all Tier 1 information contained in the generic AP1000 DCD. Therefore, a licensee referencing Appendix D incorporates by reference the Tier 1 information contained in the generic DCD. The Tier 1 ITAAC and the design descriptions, along with the plant-specific ITAAC, were included in Appendix C of the COL at its issuance.

10 CFR Part 52, Appendix D, Section VIII.A.4 states that exemptions from Tier 1 information are governed by the requirements in 10 CFR 52.63(b)(1) and 10 CFR 52.98(f). It also states that the Commission will deny such a request if it finds that the design change will result in a significant decrease in the level of plant safety otherwise provided by the design. This activity does not involve a design change; however, it does involve a departure from Tier 1 information; therefore, an exemption is requested pursuant to 10 CFR 52.63(b)(1) and 10 CFR 52.98(f).

10 CFR Part 52, Appendix D, Section VIII.B.5.a allows an applicant or licensee who references 10 CFR Part 52, Appendix D to depart from Tier 2 information without prior NRC approval, unless the proposed departure involves a change to or departure from Tier 1 information, Tier 2* information, the Technical Specifications, or requires a license amendment under 10 CFR Part 52, Appendix D, Section VIII , paragraphs B.5.b or B.5.c. The proposed amendment involves a departure from the plant-specific Tier 1 ITAAC information, but no changes are needed to the UFSAR. Thus, NRC approval is not required under this regulation.

10 CFR 52.63(b)(1) allows the licensee who references a design certification rule to request NRC approval for an exemption from one or more elements of the certification information. The Commission may only grant such a request if it determines that the exemption will comply with the requirements of 10 CFR 52.7, which, in turn, points to the requirements listed in 10 CFR 50.12 for specific exemptions. In addition, the Commission must consider whether special circumstances, as required by 10 CFR 52.7 and §50.12, outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption. Therefore, any exemption from the Tier 1 information certified by Appendix D to 10 CFR Part 52 must meet the requirements of 10 CFR 50.12, §52.7, and §52.63(b)(1).

10 CFR 52.79(a)(35) requires each applicant for a combined license (COL) to include (i) a physical security plan; and (ii) a description of the implementation of the physical security plan. The physical security plan describes how the requirements of 10 CFR Part 73 (and 10 CFR Part 11, “Criteria and procedures for determining eligibility for access to or control over special nuclear material”), are met, if applicable, including the identification and description of jobs as required by 10 CFR 11.11(a) of this chapter, at the proposed facility. The plan lists tests, inspections, audits, and other means to be used to demonstrate compliance with the requirements of 10 CFR Parts 11 and 73, if applicable. This activity does not change the VEGP Unit 3 and Unit 4 Physical Security Plan, nor does it impact how the requirements of 10 CFR Part 73 (or 10 CFR Part 11) are met.

10 CFR 52.97(b) requires the NRC to identify within the combined license the inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that, if met, are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with the license, the provisions of the Act, and the Commission's rules and regulations. The COL will continue to provide the necessary and sufficient ITAAC. As noted above, one criterion for a “necessary and sufficient” ITAAC is that it can be completed prior to the initial fuel loading. The proposed amendment will not delay ITAAC completion beyond initial fuel loading but will instead remove the Unit 4 ITAAC for security hardware and structures such that the timing of the completion of the security hardware requirements is based upon meeting the milestone of initial fuel loading associated with the exemption from 10 CFR 73.55(a)(4) that was granted by the Commission in November 2021, rather than an ITAAC completion milestone. Therefore, compliance with 10 CFR 52.97(b) is not impacted by this activity.

10 CFR 52.98(f) requires NRC approval for a proposed amendment to the COL for any modification to, addition to, or deletion from the terms and conditions of a COL. The proposed amendment involves changes to plant-specific Tier 1 ITAAC information and its corresponding COL Appendix C information, so NRC approval is required.

10 CFR 73.55 establishes the detailed requirements for development and implementation of a physical security plan. The physical security plan describes the administrative, physical, and operational measures that provide protection of the facility, and any associated special nuclear material, from both internal and external threats. Compliance with 10 CFR 73.55 provides high assurance that the plant is protected against radiological sabotage.

The specific NRC technical requirements applicable to the proposed amendment are the physical requirements in 10 CFR 73.55, which requires that the physical protection system be designed to protect against the design basis threat of radiological sabotage as stated in §73.1(a). These criteria provide high assurance for the protection of the health and safety of the public against radiological sabotage. Since there are no changes to the SES or building design, compliance with requirements of 10 CFR 73.55 is not affected.

10 CFR 73.70(e) establishes the requirements for the documentation of all tests, inspections, and maintenance performed on physical barriers, intrusion alarms, communications equipment, and other security related equipment used pursuant to the requirements of 10 CFR Part 73. This amendment request does not involve any plant changes that would affect how the security computers meet the applicable requirements of 10 CFR 73.70(f), so compliance with 73.70(f) is not affected.

3.3 EVALUATION OF EXEMPTION

Pursuant to 10 CFR 52.7, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of 10 CFR Part 52. As 10 CFR 52.7 further states, the Commission's consideration will be governed by 10 CFR 50.12, "Specific exemptions," which states that an exemption may be granted when: (1) the exemptions are authorized by law, will not present an undue risk to public health and safety, and are consistent with the common defense and security; and (2) special circumstances are present. Specifically, 10 CFR 50.12(a)(2) lists six special circumstances for which an exemption may be considered. It is necessary for one of these special circumstances to be

present in order for the NRC to consider granting an exemption request. SNC has determined that the requested exemption meets the special circumstances of 10 CFR 50.12(a)(2), paragraphs (ii) and (iii).

10 CFR 50.12(a)(2)(ii) defines special circumstances as when "[a]pplication of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule." An analysis of each of these findings is presented below. 10 CFR 50.12(a)(2)(iii) defines special circumstances as when "[c]ompliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated.

3.2.1 AUTHORIZED BY LAW

This exemption would allow SNC to implement approved revisions to Tier 1 information and corresponding information in COL Appendix C in the plant-specific DCD. This exemption is a permanent exemption limited in scope to particular Tier 1 information. Subsequent changes to this particular Tier 1, or any other Tier 1 information, would be subject to the exemption process specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52 and the requirements of 10 CFR 52.63(b)(1). As stated above, 10 CFR Part 52, Appendix D, Section VIII.A.4 allows the NRC to grant exemptions from one or more elements of the Tier 1 information. Based on 10 CFR Part 52, Appendix D, Section VIII.A.4, SNC has determined that granting of the proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, as required by 10 CFR 50.12(a)(1), the exemption is authorized by law.

3.2.2 NO UNDUE RISK TO PUBLIC HEATH AND SAFETY

The underlying purpose of Appendix D to 10 CFR Part 52 is to ensure that SNC will construct and operate the plant based on the approved information found in the plant-specific DCD incorporated by reference into the licensee's licensing basis. This exemption does not involve any change to the facility design. The proposed changes would remove Tier 1 information in the Unit 4 ITAAC tables such that the ITAAC process is not required to demonstrate that the physical measures that provide protection of the facility have been constructed in conformity with the license. These changes do not impact the licensee's requirement to comply with the exemption from 10 CFR 73.55(a)(4) that was granted by the Commission in November 2021, to implement the requirements of this section before fuel is loaded into the Unit 4 reactor. Therefore, in conformance with the general performance requirement of 10 CFR 73.55(b)(1), the physical protection program, including the security organization, will continue to provide high assurance that the activities involving special nuclear material do not constitute an unreasonable risk to the public health and security. These changes will not impact the ability of the structures, systems, or equipment to perform their design function. These changes do not add any new equipment or system interfaces to the current plant design. The proposed changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures. Accordingly, these changes do not present an undue risk from any new equipment or systems. Therefore,

as required by 10 CFR 50.12(a)(1), SNC has determined that there is no undue risk to public health and safety.

3.2.3 CONSISTENT WITH COMMON DEFENSE AND SECURITY

The proposed exemption would allow changes to elements of the plant-specific Tier 1 DCD. This is a permanent exemption limited in scope to particular Tier 1 ITAAC information. Subsequent changes to Tier 1 information would be subject to full compliance by the licensee as specified in Section VIII.A.4 of Appendix D to 10 CFR Part 52. The proposed changes would remove Tier 1 information in the Unit 4 ITAAC tables such that the ITAAC process is not required to demonstrate that the physical measures that provide protection of the facility have been constructed in conformity with the license. These changes do not impact the licensee's requirement to comply with 10 CFR 73.55(a)(4), as modified by the exemption granted by the Commission on November 23, 2021, to implement the requirements of this section before initial fuel load into the Unit 4 reactor. Therefore, in conformance with the general performance requirement of 10 CFR 73.55(b)(1), the physical protection program, including the security organization, will continue to provide high assurance that the activities involving special nuclear material are not inimical to the common defense and security. The changes do not alter or impede the design, function, or operation of any plant structures, systems, and components (SSCs) associated with the facility's physical or cyber security and, therefore, do not affect any plant equipment that is necessary to maintain a safe and secure plant status. In summary, the change has no adverse impact on plant security or safeguards. Therefore, as required by 10 CFR 50.12(a)(1), SNC has determined that the common defense and security is not impacted by this exemption.

3.2.4 SPECIAL CIRCUMSTANCES

Special circumstances, in accordance with 10 CFR 50.12(a)(2)(ii), are present whenever application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. The underlying purposes of Section III.B of Appendix D to 10 CFR Part 52 is to ensure that the licensee will construct and operate the plant based on the approved information found in the AP1000 DCD, which was incorporated by reference into the licensee's licensing basis. The proposed changes to Tier 1 will enable SNC to stand up the Physical Security Program and load fuel into the reactor based on having implemented the requirements for physical protection of licensed activities in nuclear power plants against radiological sabotage, as specified in 10 CFR 73.55, rather than performing the redundant physical security verification activities currently required by the Unit 4 physical security ITAAC. Because the physical security ITAAC are replicated verbatim from the redundant physical requirements in § 73.55, the requirement to demonstrate these redundant verification activity does not achieve the underlying purpose of Section III.B to ensure the licensee has constructed the plant based on the approved information found in the AP1000 DCD.

Special circumstances, in accordance with 10 CFR 50.12(a)(2)(iii), are present whenever compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated. 10 CFR 73.55(a)(4) specifies that the holder of a combined license shall implement the requirements of §73.55 before fuel is allowed onsite. The licensee has been granted an exemption to allow the implementation of the requirements of a physical protection program in accordance with §73.55 after the NRC

finds the requirements of 10 CFR 52.103(g) are satisfied and prior to the start of the unit's initial fuel load. Implementation of the §73.55 requirements is most commonly demonstrated through functional and performance system testing following thoroughly vetted licensee procedures and licensee inspections. The requirement to revalidate compliance with the physical aspects of §73.55 that have been replicated verbatim into the Unit 4 PS-ITAAC involves an undue hardship due to the human capital burden required to manage, plan, implement, review, document, approve, close, and maintain these Unit 4 PS-ITAAC. The additional burden placed on these verification activities simply to comply with the heightened requirements and expectations associated with all elements of ITAAC results in a human capital burden is significantly in excess of that required to perform corresponding activities to demonstrate conformance with the same hardware requirements in 10 CFR 73.55.

Special circumstances are present in the particular circumstances discussed in this license amendment request because the application of Section III.B of Appendix D to 10 CFR Part 52 in this circumstance does not serve the underlying purpose of the rule. The proposed change implements changes to Tier 1 information. This exemption request and associated revisions to Tier 1 information demonstrate that the applicable regulatory requirements will continue to be met. Consequently, the safety impact that may result from any reduction in standardization is minimized because the proposed change does not result in a reduction in the level of safety. Therefore, SNC has determined that the special circumstances required by 10 CFR 50.12(a)(2)(ii) for the granting of an exemption from Section III.B of Appendix D to 10 CFR Part 52 exist.

3.2.5 SPECIAL CIRCUMSTANCES OUTWEIGH REDUCED STANDARDIZATION

This exemption would allow the implementation of changes to Tier 1 information as proposed in the license amendment request. The proposed changes would remove Tier 1 ITAAC that provide verification prior to fuel load that the physical measures that provide protection of the facility have been constructed in conformity with the license, and rather rely on the redundant requirement in 10 CFR 73.55(a)(4), as modified by the exemption granted by the Commission in November 2021 [ML21320A043] to implement these protection measures after the Commission's 10 CFR 52.103(g) finding and prior to initial loading fuel into the reactor, while also crediting aspects of the ITAAC that have been verified by closure of the corresponding Unit 3 ITAAC.

The design functions of the systems associated with this request are unaffected, because this activity does not change the design, construction, or operation of the security system or any structures, structures, or components of the VEGP Units 3 and 4 plant design. Consequently, the safety impact that may result from any reduction in standardization is minimized, because the proposed change does not result in a reduction in the level of safety. Based on the foregoing reasons, as required by 10 CFR Part 52.63(b)(1), SNC has determined that the special circumstances outweigh the effects the departure has on the standardization of the AP1000 design.

3.2.6 NO SIGNIFICANT REDUCTION IN SAFETY

This exemption would allow the implementation of changes to Tier 1 information as proposed in the license amendment request. The changes will not impact the functional capabilities of the SSCs. The proposed changes will not adversely affect the ability of the SSCs to perform their design functions and the level of safety provided by the current systems and equipment therein is unchanged. Therefore, based on the foregoing reasons and as required by 10 CFR Part 52, Appendix D, Section VIII.A.4, SNC has determined that

granting the exemption would not result in a significant decrease in the level of safety otherwise provided by the design.

4. STATE CONSULTATION

In accordance with the Commission's regulations in 10 CFR 50.91(b)(2), the Georgia State official was notified of the proposed amendment.

5. ENVIRONMENTAL CONSIDERATIONS

The amendment and exemption change a requirement with respect to facility components located within the restricted area as defined in 10 CFR Part 20. The amendment and exemption involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. Enclosure 2 provides a finding that the requested amendment and exemption involve no significant hazards consideration. Accordingly, the requested amendment and exemption meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the requested amendment or exemption.

6. CONCLUSION

SNC has determined that pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52, the requested exemption (1) is authorized by law, (2) presents no undue risk to the public health and safety, (3) is consistent with the common defense and security, (4) presents special circumstances, (5) the special circumstances outweigh the potential decrease in safety due to reduced standardization, and (6) does not reduce the level of safety at the licensee's facility. Therefore, SNC requests the staff grant the proposed exemption from Tier 1 information.

SNC has concluded, based on the considerations discussed in Section 3.1, Technical Evaluation of the Departure, that there is reasonable assurance that: (1) the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Therefore, SNC requests the NRC Staff to find the changes proposed in this license amendment to be acceptable.

7. REFERENCES

References that were used to support closure of the Unit 3 PS-ITAAC are provided with the Basis for Verification of Corresponding Unit 3 PS-ITAAC on pages 9 through 61 of this enclosure.

Southern Nuclear Operating Company

ND-22-0000

Enclosure 2

Vogtle Electric Generating Plant (VEGP) Unit 4

Significant Hazards Consideration

(LAR-22-001)

(This Enclosure consists of 3 pages, including this cover page**)**

SIGNIFICANT HAZARDS CONSIDERATION

Southern Nuclear Operating Company (SNC) is requesting issuance of an amendment to facility Operating License No. NPF-92, issued to SNC for operation of the VEGP Unit 4, located in Burke County, Georgia.

The proposed changes would revise the VEGP Unit 4 combined license (COL) Appendix C (and corresponding plant-specific Design Control Document (DCD) Tier 1) information. Specifically, the request proposes to remove the Unit 4 Design Description elements for the plant security system (SES) and security-related aspects of the VEGP Unit 4 buildings and the associated Unit 4 Physical Security (PS) Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC), also referred to as PS-ITAAC, and non-system based ITAAC. The basis for this change is that the Unit 4 PS-ITAAC provide verbatim duplication of the security hardware requirements in 10 CFR 73.55 and share many commonalities with the PS-ITAAC for adjoining Unit 3 security structures and equipment. Accordingly, SNC finds that completion of the Unit 4 PS-ITAAC involves an unnecessary burden on the facility's staff and proposes a license amendment to remove the outstanding PS-ITAAC from the VEGP Unit 4 COL Appendix C, with corresponding changes to the plant-specific Tier 1 ITAAC. The proposed changes involve no change to the facility design. Because this proposed change requires a departure from Tier 1 information in the Westinghouse AP1000 DCD, SNC also requested an exemption from the requirements of the Generic DCD Tier 1 in accordance with section 52.63(b)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR).

As required by 10 CFR 50.91(a), SNC provides the following analysis of the issue of no significant hazards consideration, which is presented below:

1. **Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

   Response: No.

   The proposed revisions remove requirements of Unit 4 inspections, tests, analyses, and acceptance criteria (ITAAC) that are redundant to the identical physical security requirements that are required to be implemented by the Commission regulations in Subsection 73.55(a)(4) of Title 10 of the Code of Federal Regulations (10 CFR). The proposed revisions have been found to have no impact on the required functional capability of the safety systems for previously evaluated accidents and anticipated operational occurrences. The system and structures that are subject to this activity are not an initiator of any accident analyzed in the Updated Final Safety Analysis Report (UFSAR), nor do the changes involve an interface with any structure, system, or component (SSC) accident initiator or initiating sequence of events, and thus, the probabilities of the accidents evaluated in the UFSAR are not affected. The proposed changes do not involve a change to any mitigation sequence or the predicted radiological releases due to postulated accident conditions, thus, the consequences of the accidents evaluated in the UFSAR are not affected.

   Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

   Response: No.

The security structures and systems that are subject to the proposed revisions are not serve a function that could reasonably be considered to be an initiator any accident. The proposed revisions do not change the function of the related systems, and thus, the changes do not introduce a new failure mode, malfunction or sequence of events that could adversely affect safety or safety-related equipment.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The security structures and systems that are subject to the proposed revisions do not serve any functional capability relative to the safety systems for previously evaluated accidents and anticipated operational occurrences. The proposed revisions do not change the function of the related systems nor significantly affect the margins provided by any plant systems. No safety analysis or design basis acceptance limit/criterion is challenged or exceeded by the requested changes.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Therefore, it is concluded that the requested amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

Southern Nuclear Operating Company

ND-22-0000

Enclosure 3

Vogtle Electric Generating Plant (VEGP) Unit 4

Proposed Changes to Licensing Basis Documents

(LAR-22-001)

Additions identified by blue underlined text.
~~Deletions Identified by red strikethrough of text.~~
* * * indicates omitted existing text that is not shown.

(This Enclosure consists of 23 pages, including this cover page)

LICENSING BASIS CHANGE DESCRIPTIONS

(Note: Throughout this enclosure the term "Amendment No. XXX" is used, where "XXX" is the number provided by the NRC upon approval of this request.)

Changes to Unit 4 COL Appendix C

Unit 4 COL Appendix C, Section 2.6.9, Plant Security Systems:

- Remove Design Description item 3. Identify as "Not used."
- Remove Design Description item 4. Identify as "Not used."
- Remove Design Description item 5.a). Identify as "Not used."
- Remove Design Description item 5.c). Identify as "Not used."
- Remove Design Description item 6. Identify as "Not used."
- Remove Design Description item 7.a). Identify as "Not used."
- Remove Design Description item 7.b). Identify as "Not used."
- Remove Design Description item 8. Identify as "Not used."
- Remove Design Description item 9. Identify as "Not used."
- Remove Design Description item 13.a). Identify as "Not used."
- Remove Design Description item 13.b). Identify as "Not used."
- Remove Design Description item 13.c. Identify as "Not used."
- Remove Design Description item 15.a). Identify as "Not used."
- Remove Design Description item 15.b). Identify as "Not used."
- Remove Design Description item 16. Identify as "Not used."

Unit 4 COL Appendix C Table 2.6.9-1, Index No. 644:

- Remove ITAAC No. 2.6.09.05a, item 5.a). Identify as "Not used per Amendment No. XXX."
- Remove ITAAC No. 2.6.09.05a, item 15.b). Identify as "Not used per Amendment No. XXX."

Unit 4 COL Appendix C Table 2.6.9-1, Index No. 646:

- Remove ITAAC No. 2.6.09.05c, item 5.c). Identify as "Not used per Amendment No. XXX."

Unit 4 COL Appendix C Table 2.6.9-1, Index No. 647:

- Remove ITAAC No. 2.6.09.06, item 6. Identify as "Not used per Amendment No. XXX."

Unit 4 COL Appendix C Table 2.6.9-1, Index No. 650:

- Remove ITAAC No. 2.6.09.08, item 8. Identify as "Not used per Amendment No. XXX."

Unit 4 COL Appendix C Table 2.6.9-1, Index No. 652:

- Remove ITAAC No. 2.6.09.13a, item 13.a). Identify as "Not used per Amendment No. XXX."
- Remove ITAAC No. 2.6.09.13a, item 13.b). Identify as "Not used per Amendment No. XXX."

Unit 4 COL Appendix C Table 2.6.9-1, Index No. 654:

- Remove ITAAC No. 2.6.09.13c, item 13.c). Identify as "Not used per Amendment No. XXX."

COL Appendix C Table 2.6.9-1, Index No. 655:

- Remove ITAAC No. 2.6.09.15a, item 15.a). Identify as "Not used per Amendment No. XXX."
- Remove ITAAC No. 2.6.09.15a, item 16

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 659:

- Remove ITAAC No. C.2.6.09.02, item 2. Identify as "Not used per Amendment No. XXX."

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 660:

- Remove ITAAC No. C.2.6.09.03a, item 3.a), Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 661:

- Remove ITAAC No. C.2.6.09.03b, item 3.b). Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.03b, item 4.a), Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.03b, item 4.b). Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 664:

- Remove ITAAC No. C.2.6.09.05a, item 5.a). Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.05a, item 5.b). Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 666:

- Remove ITAAC No. C.2.6.09.06, item 6. Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 667:

- Remove ITAAC No. C.2.6.09.07, item 7. Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.07, item 7.a). Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.07, item 7.b). Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 668:

- Remove ITAAC No. C.2.6.09.08a, item 8.a). Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.08a, item 8.b). Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table C.2.6.9-2, Index No. 670:

- Remove ITAAC No. C.2.6.09.09, item 9. Identify as “Not used per Amendment No. XXX.”
- Remove ITAAC No. C.2.6.09.09, item 9. Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C, Section 2.6.9, Plant Security Systems:

- Remove Design Description item 3. Identify as “Not used per Amendment No. XXX.”
- Remove Design Description item 4. Identify as “Not used per Amendment No. XXX.”
- Remove Design Description item 5.a). Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table 3.3-6, Index No. 820:

- Remove ITAAC No. 3.3.00.14, item 14. Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table 3.3-6, Index No. 821:

- Remove ITAAC No. 3.3.00.16, item 16. Identify as “Not used per Amendment No. XXX.”

Unit 4 COL Appendix C Table 3.3-6, Index No. 822:

- Remove ITAAC No. 3.3.00.17, item 17. Identify as “Not used per Amendment No. XXX.”

Changes to Plant-Specific Tier 1

Plant-specific Tier 1, Section 2.6.9, Plant Security Systems:

- Revise Design Description item 3 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 4 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 5.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 6 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 7.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 7.b) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 8 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 9 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 13.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 13.b) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 13.c) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 15.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 15.b) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 16 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 5.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise ITAAC item No.15.b) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 5.c) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 6 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 8 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 13.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise ITAAC item No. 13.b) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 13.c) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 2.6.9-1:

- Revise ITAAC item No. 15.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise ITAAC item No. 16 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1, Section 3.3, Buildings:

- Revise Design Description item 3 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 4 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”
- Revise Design Description item 5.a) to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 3.3-6:

- Revise ITAAC item No. 14 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 3.3-6:

- Revise ITAAC item No. 16 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Plant-specific Tier 1 Table 3.3-6:

- Revise ITAAC item No. 17 to identify that it applies to Unit 3 only and is “Not used per Amendment No. XXX for VEGP Unit 4.”

Markups of the licensing basis documents are provided on the following pages.

COL Appendix C Section 2.6.9, Design Description, items 5.a) and 15.b), are revised (for ITAAC Index No. 644) as follows:

5. a) Not used.

15. b) Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index No. 644), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
644	2.6.09.05a	Not used per Amendment No. XXX		

Plant-Specific Tier 1 Section 2.6.9, Design Description, items 5.a) and 15.b), are revised, as follows:

5. a) Unit 3 only: Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after each alarm annunciation within the perimeter barrier.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

15. b) Unit 3 only: Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm station.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 644), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
5.a) Unit 3 only: Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after each alarm annunciation within the perimeter area barrier. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Test, inspection, or a combination of test and inspections of the installed systems will be performed.	Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.
15.b) Unit 3 only: Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm stations. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Tests will be performed on intrusion detection and assessment equipment.	The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.

COL Appendix C Section 2.6.9, Design Description, item 5.c, is revised (for ITAAC Index No. 646), as follows:

5. c) Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index No. 646), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
646	2.6.09.05c	Not used per Amendment No. XXX		

Plant-Specific Tier 1 Section 2.6.9, Design Description, item 5.c), is revised, as follows:

5. c) Unit 3 only: The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 646), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
5.c) Unit 3 only: The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Inspections and/or analysis of the central and secondary alarm station will be performed.	The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists.

COL Appendix C Section 2.6.9, Design Description, item 6, is revised (for ITAAC Index No. 647), as follows:

6. Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index No. 647), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
647	2.6.09.06	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 2.6.9, Design Description, item 6, is revised, as follows:

6. Unit 3 only: The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 647) as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6. Unit 3 only: The vehicle barrier system is installed and located at the necessary stand-off distance to protect against the DBT vehicle bombs. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Inspections and analysis will be performed for the vehicle barrier system.	The vehicle barrier system will protect against the DBT vehicle bombs based upon the stand-off distance of the system.

COL Appendix C Section 2.6.9, Design Description, item 8, is revised (for ITAAC Index No. 650) is revised, as follows:

8. Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index Nos. 650), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
650	2.6.09.08	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 2.6.9, Design Description, item 8, is revised, as follows:

8. Unit 3 only: Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles.
   Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 650), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
8. Unit 3 only: Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Inspection of the illumination in the isolation zones and external areas of the protected area will be performed.	The illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation.

COL Appendix C Section 2.6.9, Design Description, items 13.a) and 13.b), are revised (for ITAAC Index No. 652), as follows:

13. a) Not used.

b) Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index No. 652), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
652	2.6.09.13a	Not used per Amendment No. XXX for VEGP Unit 4.		

Plant-Specific Tier 1 Section 2.6.9, Design Description, items 13.a) and 13.b), is revised, as follows:

13. a) Unit 3 only: The central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

b) Unit 3 only: The central and secondary alarm stations are capable of continuous communications with security personnel.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 652), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
13.a) Unit 3 only: The central and secondary alarm stations have conventional (landline) telephone service with the main control room and local law enforcement authorities. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' conventional telephone services will be performed.	The central and secondary alarm stations are equipped with conventional (landline) telephone service with the main control room and local law enforcement authorities.
3.b) Unit 3 only: The central and secondary alarm stations are capable of continuous communication with security personnel. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Tests, inspections, or a combination of tests and inspections of the central and secondary alarm stations' continuous communication capabilities will be performed.	The central and secondary alarm stations are equipped with the capability to continuously communicate with security officers, watchmen, armed response individuals, or any security personnel that have responsibilities during a contingency event.

COL Appendix C Section 2.6.9, Design Description, item 13.c), is revised (for ITAAC Index No. 654), is revised as follows:

13. c) Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index No. 654), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
654	2.6.09.13c	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 2.6.9, Design Description, item 13.c), is revised, as follows:

13. c) Unit 3 only: Non-portable communication equipment in the central and secondary alarm stations remains operable from an independent power source in the event of loss of normal power.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 654), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
13.c) Unit 3 only: Non-portable communication equipment in the central and secondary alarm stations remains operable from an independent power source in the event of loss of normal power. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Tests, inspections, or a combination of tests and inspections of the non-portable communications equipment will be performed.	Non-portable communication devices (including conventional telephone systems) in the central and secondary alarm stations are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power.

COL Appendix C Section 2.6.9, Design Description, items 15.a) and 16), are revised (for ITAAC Index No. 655), as follows:

15. a) Not used.

16. Not used.

COL Appendix C Table 2.6.9-1 is revised (for ITAAC Index Nos. 655), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
655	2.6.09.15a	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 2.6.9, Design Description, items 15.a) and 16, are revised, as follows:

15. a) Unit 3 only: Security alarm devices including transmission lines to annunciators are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

16. Unit 3 only: Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 2.6.9-1 is revised (for ITAAC Index No. 655), as follows:

Table 2.6.9-1
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
15.a) Unit 3 only: Security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power). Alarm annunciation shall indicate the type of alarm (e.g., intrusion alarms and emergency exit alarm) and location. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	A test will be performed to verify that security alarms, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.	A report exists and concludes that security alarm devices, including transmission lines to annunciators, are tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power) and that alarm annunciation indicates the type of alarm (e.g., intrusion alarms and emergency exit alarms) and location.
16. Unit 3 only: Equipment exists to record onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Test, analysis, or a combination of test and analysis will be performed to ensure that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.	A report exists and concludes that equipment is capable of recording each onsite security alarm annunciation, including the location of the alarm, false alarm, alarm check, and tamper indication; and the type of alarm, location, alarm circuit, date, and time.

COL Appendix C Table C.2.6.9-2 is revised (for ITAAC Index No. 659, 660, 661, 664, 666, 667, 668, and 670), as follows:

Table C.2.6.9-2
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
659	C.2.6.09.02	Not used per Amendment No. XXX.		
660	C.2.6.09.03a	Not used per Amendment No. XXX.		
661	C.2.6.09.03b	Not used per Amendment No. XXX.		

* * *

664	C.2.6.09.05a	Not used per Amendment No. XXX.		

* * *

666	C.2.6.09.06	Not used per Amendment No. XXX.		
667	C.2.6.09.07	Not used per Amendment No. XXX.		
668	C.2.6.09.08a	Not used per Amendment No. XXX.		
670	C.2.6.09.09	Not used per Amendment No. XXX.		

COL Appendix C Section 3.3, Design Description, item 14, is revised (for ITAAC Index No.820), as follows:

14. Not used.

COL Appendix C Table 3.3-6 is revised (for ITAAC Index No. 820), as follows:

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
820	3.3.00.14	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 2.6.9, Design Description, item 5.c), is revised, as follows:

14. Unit 3 only: The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.
    Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 3.3-6 is revised (for ITAAC Index No. 820), as follows:

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
14. Unit 3 only: The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	Type test, analysis, or a combination of type test and analysis will be performed for the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station.	A report exists and concludes that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

COL Appendix C Section 2.6.9, Design Description, item 3, is revised (for ITAAC Index No.821), as follows:

3.

COL Appendix C Section 3.3, Design Description, item 16, is revised (for ITAAC Index No.821), as follows:

16.

COL Appendix C Table 3.3-6 is revised (for ITAAC Index No. 821), as follows:

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
821	3.3.00.16	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 3.3, Design Description, item 16, is revised, as follows:

16. Unit 3 only: Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area.
Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.

Plant-Specific Tier 1 Table 3.3-6 is revised (for ITAAC Index No. 821), as follows:

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
16. Unit 3 only: Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	An inspection will be performed to ensure that the location of the secondary security power supply equipment for alarm annunciator equipment and non-portable communications equipment is within a vital area.	Secondary security power supply equipment for alarm annunciator equipment and non-portable communication equipment is located within a vital area.

COL Appendix C Section 2.6.9, Design Description, item 4, is revised (for ITAAC Index No.822), as follows:

4. Not used.

COL Appendix C Section 3.3, Design Description, item 17, is revised (for ITAAC Index No.822), as follows:

17. Not used.

COL Appendix C Table 3.3-6 is revised (for ITAAC Index No. 822), as follows:

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
822	3.3.00.17	Not used per Amendment No. XXX.		

Plant-Specific Tier 1 Section 3.3, Design Description, item 17, is revised, as follows:

17. Vital areas are locked and alarmed with active intrusion detection systems that annunciate in the central and secondary alarm stations upon intrusion into a vital area.

Plant-Specific Tier 1 Table 3.3-6 is revised (for ITAAC Index No. 822), as follows:

Table 3.3-6
Inspections, Tests, Analyses, and Acceptance Criteria

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
17. Unit 3 only: Vital areas are locked and alarmed with active intrusion detection systems that annunciate in the central and secondary alarm stations upon intrusion into a vital area. Unit 4: Not used per Amendment No. XXX for VEGP Unit 4.	An inspection of the as-built vital areas, and central and secondary alarm stations are performed.	Vital areas are locked and alarmed with active intrusion detection systems and intrusion is detected and annunciated in both the central and secondary alarm stations.