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13 CONDUCT OF OPERATIONS

13.6 Physical Security

13.6.1 Introduction

The early site permit (ESP) application for the PSEG Site, submitted by PSEG Power, LLC, and PSEG Nuclear, LLC (the applicant), describes the site characteristics applicable to security and provides information to demonstrate that security plans and measures can be developed in accordance with the applicable requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors against Radiological Sabotage," and 10 CFR 100.21(f). Within Chapter 1, "Introduction and General Description," Chapter 2, "Site Characteristics and Site Parameters," and Chapter 13, "Conduct of Operations," Section 13.6, "Industrial Security," of the Site Safety Analysis Report (SSAR), contained in Part 2 of the PSEG ESP application, the applicant described the characteristics of the proposed site and the bounding parameters that establish the Plant Parameter Envelope (PPE) within which a reactor design will be selected before applying for a combined license (COL) for construction and operation of one or two units.

The applicant's proposed site (referred to as PSEG Site) is located in the Lower Alloways Creek Township, Salem County, NJ, on the southern part of Artificial Island on the eastern bank of the Delaware River, it is adjacent to and bordered on the west and south by the low coastal plain - tidal affected area of the Delaware River. The proposed site comprises a 734-acre PSEG property surrounded by extensive marshlands, and meadowlands. The layout of the PSEG Site is provided in SSAR Figure 1.2-3, "Site Utilization Plan," and in the aerial photograph in Figure 2.1-3, "View of PSEG Site," of the Environmental Report (ER) contained in Part 3 of the ESP application.

13.6.2 Summary of Application

SSAR Chapter 1, "Introduction and General Description," and SSAR Chapter 2, "Site Characteristics and Site Parameters," provide information on the specific site location, site description, various site maps and, PSEG Site aerial photographs that depict site topography. The application includes descriptions and depictions of the locations of existing industrial facilities, power generating stations, sewage treatment plants, pipelines, waterways, mining operations, highways, railroads, airports, airways, and military facilities. The application also provides descriptions and evaluations of potential hazards within the vicinity of the site (explosions, flammable vapor clouds, toxic chemicals, fires, liquid spills, radiological hazards, dam failures, etc.) including natural hazards, such as floods, ice, and seismic activity. SSAR Section 13.6, "Industrial Security," describes site characteristics to address the applicable regulatory requirements for the PSEG Site to be such that adequate security plans and measures can be developed.

SSAR Chapters 1 and 2 and the ER include diagrams that provide (or identify) site layout depictions including a center-point reference to the proposed Power Block location inside a 70-acre land mass, and located at U.S. National Grid (NAD83); longitude: 75° 32' 24.3316"; latitude: 39° 28' 23.7436". The diagrams also depict other features of interest such as an overall layout of the location of the site, which is north of Hope Creek Generating Station (HCGS) and Salem Generating Station (SGS), and a proposed Exclusion Area Boundary (EAB)

that will encompass the new plant. SSAR Chapters 1 and 2 and the ER also describe other manmade features such as a proposed barge slip, intake structures, and an existing Hope Creek fuel oil storage tank. The PSEG Site Utilization Plan map in SSAR Figure 1.2-3, coupled with the aerial photograph of ER Figure 2.1-3, provides information that can be used to assess additional manmade and natural features.

13.6.3 Regulatory Basis

The provisions of 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants," Subpart A, "Early Site Permits," establishes the requirements and procedures applicable to the U.S. Nuclear Regulatory Commission (NRC) issuance of an ESP for approval of a site for one or more nuclear power facilities separate from the filing of an application for a construction permit or a COL for the facility.

Provisions in 10 CFR 52.17, "Contents of Applications; Technical Information" set forth the requirements for the contents and technical information to be submitted in applications under this subpart:

- 10 CFR 52.17(a)(1)(x), as it relates to the requirement for submission of information to demonstrate that the site characteristics are such that adequate security plans and measures can be developed.
- 10 CFR 52.17(a)(1)(xii), as it relates to the requirement for submission of an evaluation of the site against applicable sections of the Standard Review Plan (SRP) revision in effect 6 months before the docket date of the application.

The provisions in 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," set forth the requirements for power reactor licensees and applicants to establish and maintain a physical protection program, including a security organization, which will have as its objective to provide high assurance that activities involving special nuclear material are not harmful to the common defense and security and do not constitute an unreasonable risk to public health and safety.

The provisions in 10 CFR 100.21, "Non-seismic siting criteria," set forth the requirements regarding non-seismic siting criteria for proposed commercial power reactor sites.

- 10 CFR 100.21(f), as it relates to the requirement that site characteristics to be such that adequate security plans and measures can be developed.

Acceptance criteria adequate to meet the above requirements include those set forth in:

1. Regulatory Guide (RG) 4.7, "General Site Suitability Criteria for Nuclear Power Stations," Revision 2, April 1998, as it relates to the suitability criteria for a proposed site.
2. NUREG 0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Chapter 13, "Conduct of Operations," Section 13.6.3, "Physical

Security – Early Site Permit,” Revision 1; October 2010¹, as it relates to the review of physical security aspects of a permit application for a proposed site.

13.6.4 Technical Evaluation

In conducting the technical evaluation of the information contained in SSAR Chapter 13, “Conduct of Operations,” Section 13.6 “Industrial Security”, the staff also reviewed the pertinent information and figures contained in the following SSAR chapters and sections:

- Chapter 1, “Introduction and General Discussion”; Section 1.1, “Introduction”; Section 1.2, “General Plant Description”
- Chapter 2, “Site Characteristics and Site Parameters”; Section 2.0, “Site Characteristics”; Section 2.1, “Geography and Demography”; Section 2.2, “Identification of Potential Hazards in Site Vicinity”; and Section 2.4, “Hydrologic Engineering”
- Chapter 3, “Design of Structures, Components, Equipment and Systems”; Section 3.5.1.6, “Aircraft Hazards”; Section 3.5.1.6.1, “Airports”; Section 3.5.1.6.2, “Military Airports and Routes”; Section 3.5.1.6.3, “Airways”; and Section 3.5.1.6.4, “References”

In addition, the staff reviewed the pertinent information and figures contained in the ER, Chapters 1 and 2, to confirm information regarding the site characteristics, and to ensure information in the SSAR and ER, applicable to the review of physical security, is consistent.

The staff review focused on (1) whether the information in the application meets the requirements stated in 10 CFR 52.17(a)(1)(x) to demonstrate that the site is such that security plans and measures can be developed, (2) that the applicant has considered the applicable physical protection requirements stated in 10 CFR 73.55 in the selection of the site and its proposed layout, (3) that the information in the application related to the site characteristics and potential hazards provided sufficient technical basis to demonstrate that the site characteristics and potential hazards do not present impediments to preclude the development of adequate security plans and measures consistent with 10 CFR 100.21(f).

The staff review also included information the applicant submitted in response to Requests for Additional Information (RAI) 3, Questions 13.06.03-1, 13.06.03-2, 13.06.03-4, 13.06.03-5, and RAI 17, Question 13.06.03-6. These are discussed in the following sections of this report.

13.6.4.1 *Security Boundaries*

In SSAR Section 13.6, the applicant stated: “The PSEG site is sufficiently large to provide adequate distances between structures and the probable location of security boundaries.” The applicant also stated the following: “When a reactor technology selection is made and a

¹ The staff utilized Revision 1 (October 2010) of NUREG-0800 (SRP), Section 13.6.3, for the ESP application physical security review. The changes between the 2007 and 2010 versions were addressed by means of RAIs; therefore, Revision 1 is the referenced SRP Section 13.6.3 revision for this ESP review.

combined license application is prepared, the specific design features to assure site security in compliance with 10 CFR 73.55, will be defined.”

SSAR Figure 1.2-3 depicts the new PSEG property lines, EAB, plant parameters for the proposed new plant Power Block and related facilities, and water structures as well as the existing PSEG property lines, plant facilities and boundaries of Salem and Hope Creek Generating Stations. In addition, SSAR Figure 1.2-3 identifies the center-point reference to the proposed Power Block location inside a 70-acre land mass, and located at U.S. National Grid (NAD83); longitude: 75° 32' 24.3316"; latitude: 39° 28' 23.7436". Along with the proposed Power Block location, SSAR Figure 1.2-3 depicts two large land masses directly adjacent to the Power Block land mass designated for the construction of plant support equipment, specifically a bounding 25-acre area adjoining the eastern boundary of the proposed Power Block location designated for the new plant switchyard and a bounding 50-acre area adjoining the northern boundary of the proposed Power Block area designated for new safety-related water sources (e.g., cooling towers).

On the basis of its review, the staff finds:

- The information contained in the application is consistent with the requirements of 10 CFR 52.17(a)(1)(x) and provides a sufficient basis to conclude that site characteristics regarding the establishment of security boundaries are such that adequate security plans and measures can be developed.
- Based on the information contained in the application, the postulated plant parameters, which consist of the new plant site center within the 70-acre proposed Power Block land mass enveloped within the PSEG proposed new property line and exclusion area, are sufficiently large enough to allow for the establishment of the security boundaries of the owner controlled area (OCA), protected area (PA), and protected area perimeter isolation zones, with sufficient distance between these security boundaries and vital areas, for the implementation of a physical protection program consistent with the requirements of 10 CFR 73.55.

13.6.4.2 *Site Characteristics*

In SSAR Chapters 1 and 2, the applicant describes and depicts the site characteristics and potential nearby hazards. Specifically, SSAR Figure 1.2-3 depicts and identifies features of the overall layout of the site, the proposed EAB as well as existing facilities and structures and other manmade features, such as, a proposed barge slip, intake structures, and industrial hazards. In addition, SSAR Figure 1.2-3 identifies the center-point reference to the proposed Power Block location inside a 70-acre land mass, and located at U.S. National Grid (NAD83); longitude: 75° 32' 24.3316"; latitude: 39° 28' 23.7436". Along with the proposed Power Block location, SSAR Figure 1.2-3 depicts two large land masses directly adjacent to the Power Block land mass that are designated for the construction of plant support equipment. Specifically, the figure depicts a bounding 25-acre area adjoining the eastern boundary of the proposed Power Block location designated for the new plant switchyard and a bounding 50-acre area adjoining the northern boundary of the proposed Power Block area designated for new water sources (e.g., cooling towers).

In SSAR Section 13.6, “Industrial Security,” the applicant stated, in part:

The characteristics of the new plant footprint are such that the applicable requirements of the following are met: 10 CFR 73.55, Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage; NRC Regulatory Guide 4.7, General Site Suitability Criteria for Nuclear Stations; NEI 03-12, Template for Security Plan and Training and Qualification Plan; EA-03-086, Revised Design Basis Threat Order.

In RAI 3, Question 13.06.03-1, the staff requested that the applicant clarify the requirements referenced in the above quoted statement of the application. In a February 14, 2011, response to RAI 3, Question 13.06.03-1, the applicant clarified that the requirements referenced in SSAR Section 13.6 and as identified in the RAI, are the requirements stated in 10 CFR 73.55, "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage." The applicant identified that the remaining references listed in SSAR Section 13.6 are NRC and industry guidance to which PSEG will conform.

The staff finds the applicant's February 14, 2011, response to RAI 3, Question 13.06.03-1 acceptable because the applicant clarified the statement identifying the requirements and guidance in SSAR Section 13.6. The applicant committed to revise SSAR Section 13.6 to incorporate clarifying changes in response to RAI 3, Question 13.06.03-1. The staff confirmed that SSAR Revision 1, dated May 21, 2012, was revised as committed in the RAI response. Accordingly, the staff finds the applicant adequately addressed this issue and, therefore, considers RAI 3, Question 13.06.03-1 resolved.

On the basis of its review, the staff finds:

- The information contained in the application is consistent with the requirements stated in 10 CFR 52.17(a)(1)(x), and along with the applicant's response to RAI 3, Question 13.06.03-1, provides sufficient basis to conclude that site characteristics regarding the installation of physical protection equipment and the implementation of a physical protection program are such that adequate security plans and measures can be developed.
- Based on the information contained in the application, the characteristics and topographical features of the PSEG Site will not pose an impediment to the implementation of a physical protection program. The proposed Power Block location inside the 70-acre land mass is of sufficient size for the installation of intrusion detection and assessment equipment, physical barriers, vehicle checkpoints and search areas (sally ports), and will accommodate the implementation of a physical protection program consistent with the requirements of 10 CFR 73.55.

13.6.4.3 *Approaches*

In SSAR Section 2.2.2.5, "Highways," the applicant described existing approaches or roadways to the PSEG Site. In SSAR Section 2.2.2.6, "Railroads," the applicant addressed railroad lines that are in the vicinity of the site and identified that the closest railroad line is 13.2 km (8.2 mi) to the northeast and there are no plans for expansion at this time.

SSAR Section 2.2.2.7, "Airports, Airways, and Military Training Routes," identifies private airports, helipads, and heliports in the vicinity of the PSEG Site. An existing helipad is owned and operated by PSEG and is located 1172.87 m (3,848 ft) southeast of the proposed 70-acre

Power Block location. Operations on the PSEG helipad are limited to medical emergencies and corporate use.

SSAR Chapter 3, "Design of Structures, Components, Equipment, and Systems," Section 3.5.1.6.1, "Airports," identifies eight airports and helipads within 8-16 km (5-10 mi) of the proposed plant location at the PSEG Site, and that the Salem/Hope Creek helipad is located within 8 km (5 mi) of the proposed plant location at the PSEG Site and exists for corporate and emergency use. SSAR Section 3.5.1.6.2, "Military Airports and Routes," indicates that the New Castle County Airport is the closest facility with military operations (Air National Guard), and is located 23.3 km (14.5 mi) northeast of the site. The closest dedicated military facility is Dover Air Force Base, located 38.3 km (23.8 mi) from the PSEG Site.

In RAI 3, Question 13.06.03-2, the staff requested that the applicant address any proposed construction or planning of roadways or approaches to the proposed facility. In a February 14, 2011, response to RAI 3, Question 13.06.03-2, the applicant stated that a new second road in the form of a causeway is proposed for vehicular access to the site. The proposed causeway is conceptually designed as a 48-foot wide elevated structure that extends from the PSEG Site 7.6 km (4.7 mi) towards the northeast along, or adjacent to, the existing Red Lion 500 kV transmission right-of-way to the intersection of Money Island Road and Mason Point Road in Elsinboro Township. The proposed causeway's land approach to the PSEG Site is depicted in SSAR Figure 1.2-3.

The staff finds the applicant's February 14, 2011, response to RAI 3, Question 13.06.03-2 acceptable because the applicant provided additional information regarding proposed roadways or approaches to the PSEG Site, thereby enabling evaluation of the site's proposed roadways or approaches against the applicable requirements in 10 CFR 73.55. The applicant committed to revising SSAR Section 2.2.2.5, "Highways," to incorporate clarifying changes in response to RAI 3, Question 13.06.03-2. The staff confirmed that the SSAR Revision 1, dated May 21, 2012, was revised as committed in the RAI response. Accordingly, the staff finds the applicant adequately addressed this issue and, therefore, considers RAI 3, Question 13.06.03-2, resolved.

SSAR Section 13.6 discusses a modification of current SGS and HCGS Coast Guard agreements to control the area of the Delaware River in the vicinity of these sites, which will address the inclusion of the new plant at the proposed PSEG Site.

In RAI 3, Question 13.06.03-4, the staff requested that the applicant provide information to address all primary and secondary waterways navigable or accessible that provide access to the PSEG Site. In a February 14, 2011, response to RAI 3, Question 13.06.03-4, the applicant stated that the only navigable waterway that provides water access to the PSEG Site is the Delaware River, which runs along the western border of the PSEG Site. SSAR Figure 2.5.1-30, "New Plant Location Aerial Photography," depicts a coastal salt marsh complex comprised of small creeks and tributaries that border the northern and eastern edge of the PSEG Site. In addition, SSAR Figure 2.5.1-30 depicts approximately 11 defined creeks within the 0.96 km (0.6 mi) radius. The creeks generally decrease in width as they approach the vicinity of the proposed 70-acre Power Block area shown on SSAR Figure 1.2-3. The creeks range in width from approximately 9.14 m (30 ft) at the outer radius of SSAR Figure 2.5.1-30 to a width of approximately 0.6-1.52 m (2-5 ft) for the streams closest to the vicinity of the proposed Power Block. All of these creeks are tidally influenced and most are less than 0.61-0.91 m (2-3 ft) deep at high tide, at low tide, they are essentially mudflats. The characteristics of these creeks

and streams are such that traditional navigability is highly limited or nonexistent and accessibility to most of these disbursed channels and creeks would be tidally dependent.

The staff finds the applicant's February 14, 2011, response to RAI 3, Question 13.06.03-4, acceptable because the applicant provided additional detailed information about the navigability of surrounding primary or secondary waterways, thereby enabling evaluation of the site waterways against the applicable requirements of 10 CFR 73.55. Accordingly, the staff considers RAI 3, Question 13.06.03-4 resolved.

In SSAR Section 2.2, "Identification of Potential Hazards in Site Vicinity," the applicant described nearby existing road transportation routes and vehicular land approaches that pose potential risks or hazards to the proposed PSEG Site. The closest primary road providing paved access to the proposed site is New Jersey Highway 49, where sole endpoint access to the proposed PSEG Site will continue on the secondary Alloway Creek Neck Road. The only highway within 5 miles of the PSEG Site is Delaware Route 9, which at its closest point is 4.96 km (3.1 mi) west of the proposed Power Block area. SSAR Figure 1.2-3 and the aerial photograph in ER Figure 2.1-3 do not depict the existence of secondary routes or dirt roads.

Therefore, in RAI 17, Question 13.06.03-6, the staff requested that the applicant identify, characterize, and depict the location of secondary roads, trails and routes leading to the proposed site. In an April 5, 2011, response to RAI 17, Question 13.06.03-6, the applicant stated that SSAR Section 2.2 identifies, characterizes, and depicts the transportation routes within 16 km (10 mi) of the PSEG Site. The applicant also stated that SSAR Section 2.2.1 identifies all transportation routes within 8 km (5 mi) of the PSEG Site and references SSAR Figure 2.2-1, which visually depicts highways, roads, and railroads within 8-16 km (5-10 mi) of the PSEG Site. SSAR Figure 2.2-1 depicts the surrounding public roadways in close proximity to the PSEG Site including Alloway Creek Neck Road, which is the closest public road to the PSEG Site. SSAR Section 2.2.2.5 characterizes Alloway Creek Neck Road as a secondary road that eventually transitions into the dedicated plant access road leading to the PSEG Site. SSAR Figure 1.2-3 depicts onsite roadways designated for operating plant ingress/egress. The onsite roadways are also used by the U.S. Army Corp of Engineers to access the Confined Disposal Facilities north of the PSEG Site via a dirt road traversing the shoreline north of the PSEG Site. Additionally, the applicant stated that aside from the existing access road, there are currently no other secondary roads, trails or routes that provide pedestrian or vehicular access to the PSEG Site.

The staff finds the applicant's April 5, 2011, response to RAI 17, Question 13.06.03-6, acceptable because the applicant confirmed that there are no additional approaches, such as secondary roads, trails and routes, to be included in the evaluation of the site's land approaches other than those described and depicted in the above identified SSAR sections and figures. Accordingly, the staff considers RAI 17, Question 13.06.03-6 resolved.

On the basis of its review, the staff finds:

- The information contained in the application is consistent with the requirements stated in 10 CFR 52.17(a)(1)(x) and, along with the applicant's responses to RAI 3, Question 13.06.03-2; RAI 3, Question 13.06.03-4; and RAI 17, Question 13.06.03-6, provides a sufficient basis to conclude that site characteristics regarding the identification of approaches to the site that may require security control measures are such that adequate security plans and measures can be developed.

- Based on the information contained in the application, the approaches to the proposed PSEG Site do not present impediments to the implementation of a physical protection program. The approaches to the proposed site (e.g., barge slips, main access road, transportation routes, cliffs, depressions, hills, mounds, open waterways, and trails, roadways or railways) can be addressed and managed through the implementation of a physical protection program consistent with the requirements of 10 CFR 73.55.

13.6.4.4 *Industrial Hazards*

As to nearby facilities and pipelines that may pose potential hazards to the PSEG Site development of adequate security plans and measures, the applicant states in SSAR Section 13.6, "Based on review of nearby facilities, there are no potential hazards in the vicinity of the PSEG Site."

In SSAR Section 2.2.2.2, "Pipelines," the applicant stated: "No natural gas or hazardous liquid pipelines are located within 5 miles of the proposed PSEG site." Additionally, the nearest gas transmission line runs parallel to U.S. Route 13, and is located 9.5 km (5.9 mi) west of the proposed Power Block area. In a June 17, 2010, teleconference with PSEG, the applicant stated that no new pipelines are currently being considered to be built in the area.

In SSAR Section 2.2, "Identification of Potential Hazards in Site Vicinity," Tables 2.2-1 through 2.2-22, the applicant provided information on potential hazards at and within 8-16 km (5-10 mi) of the PSEG Site. This includes potential hazards as industrial facilities, chemical storage locations, and transportation routes.

On the basis of its review, the staff finds:

- The information contained in the application is consistent with the requirements stated in 10 CFR 52.17(a)(1)(x), and provides a sufficient basis to conclude that site characteristics about potential industrial hazards to the site are such that adequate security plans and measures can be developed.
- The information contained in the application identifies there is sufficient spatial separation between the proposed PSEG Site and the potential industrial hazards within the vicinity of the site such that the potential industrial hazards do not present impediments that would preclude the implementation of a physical protection program consistent with the requirements of 10 CFR 73.55.

13.6.4.5 *Unattended Openings*

To evaluate the information about unattended openings that intersect security boundaries, the staff reviewed SSAR Section 2.1, "Geography and Demography"; SSAR Section 13.6, "Industrial Security"; and SSAR Figure 1.2-3 and the aerial photograph in ER Figure 2.1-3 that depict the 70-acre bounding location of the Power Block in which the PSEG Site's protected area will be established. The staff was unable to locate sufficient information in the SSAR or ER to address unattended openings that intersect a security boundary. Therefore, in RAI 3, Question 13.06.03-5, the staff requested that the applicant provide descriptions and locations of planned or existing culverts or unattended openings. In a February 14, 2011, response to RAI 3, Question 13.06.03-5, the applicant stated that a reactor technology for the proposed plant at the PSEG Site had not yet been chosen, and that the location and design details on

planned culverts and openings associated with the stormwater management systems have not been determined yet. The applicant also confirmed that upon selecting a reactor technology, detailed engineering associated with any designed culverts or openings as part of the site drainage plan will be developed and security attributes of these openings will be addressed in the formal Security Plan developed and submitted as part of the COL application.

Additionally, the applicant stated that the pre-existing culverts and openings relative to the PSEG Site delineated in SSAR Figure 1.2-3 and ER aerial photograph Figure 2.1-3 will be altered or eliminated as part of the excavation process for the new plant. A significant portion of the 70-acre Power Block area, delineated in the Site Utilization Plan shown on SSAR Figure 1.2-3, will be excavated to a depth of 18.29-22.86 m (60-75 ft). The depth of excavation will depend on the selected reactor technology and the final location of safety related structures within the Power Block boundary. This excavation will then be backfilled with structural fill or lean concrete. The scale of this excavation, which is described in SSAR Section 2.5.4.5 and depicted in SSAR Figures 2.5.4.5-1 and 2.5.4.5-2, will significantly alter or eliminate any pre-existing culverts or openings.

The staff finds the applicant's February 14, 2011, response to RAI 3, Question 13.06.03-5, acceptable because the applicant indicated that existing culverts would be altered or eliminated during site excavation. The applicant also confirmed that the security attributes of unattended openings that intersect security boundaries would be addressed within its COL application. The staff maintains that a COL Action item is not warranted since the requirement of 10 CFR 73.55(i)(5)(iii) for the protection of unattended openings that intersect a security boundary will be addressed at the COL stage. Accordingly, the staff considers RAI 3, Question 13.06.03-5, resolved.

On the basis of its review, the staff finds:

- The information contained in the applicant's February 14, 2011, response to RAI 3, Question 13.06.03-5, is consistent with the requirements stated in 10 CFR 52.17(a)(1)(x), and provides a sufficient basis to conclude that site characteristics with the proposed alteration or elimination of the existing unattended openings that intersect a security boundary are such that adequate security plans and measures can be developed.
- Based on the information provided in the applicant's February 14, 2011, response to RAI 3, Question 13.06.03-5, in which the applicant confirmed that existing culverts or openings will be altered or eliminated during site excavation and that the security attributes of any planned and designed unattended openings that intersect a security boundary will be addressed in the COL application consistent with the requirements of 10 CFR 73.55, the existing unattended openings do not present an impediment to the implementation of a physical protection program.

13.6.5 Conclusions

As described above, the staff concludes that the applicant provided sufficient technical basis to demonstrate that the site characteristics and potential hazards do not present impediments that would preclude the development of adequate security plans and measures. The staff also concludes that the PSEG Site is such that adequate security plans and measures can be developed consistent with the requirements in 10 CFR 100.21(f).