

CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Thursday, August 11, 2011 2:48 PM
To: Robert.Poche@unistarnuclear.com; 'cc3project@constellation.com'
Cc: CCNPP3eRAIPEm Resource; Lee, Pete; Schnetzler, Bonnie; Colaccino, Joseph; Jaffe, David; Wilson, Anthony; Vrahoretis, Susan; Ford, Tanya
Subject: Draft RAI 317 RSRLB 5839
Attachments: DRAFT RAI 317 RSRLB 5839.doc

Rob,

Attached is Draft RAI No. 317 (eRAI No. 5839). You have until August 25, 2011 to review it and decide whether you need a clarification phone call to discuss any questions in the RAI before the final issuance. After the phone call or on August 25, 2011, the RAI will be finalized and sent to you for response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Thanks.

SURINDER ARORA, PE
PROJECT MANAGER,
Office of New Reactors
US Nuclear Regulatory Commission

Phone: 301 415-1421
FAX: 301 415-6406
Email: Surinder.Arora@nrc.gov

Hearing Identifier: CalvertCliffs_Unit3Col_RAI
Email Number: 136

Mail Envelope Properties (B46615B367D1144982B324704E3BCEED844BEFEF19)

Subject: Draft RAI 317 RSRLB 5839
Sent Date: 8/11/2011 2:47:50 PM
Received Date: 8/11/2011 2:47:51 PM
From: Arora, Surinder

Created By: Surinder.Arora@nrc.gov

Recipients:

"CCNPP3eRAIEm Resource" <CCNPP3eRAIEm.Resource@nrc.gov>
Tracking Status: None
"Lee, Pete" <Pete.Lee@nrc.gov>
Tracking Status: None
"Schnetzler, Bonnie" <Bonnie.Schnetzler@nrc.gov>
Tracking Status: None
"Colaccino, Joseph" <Joseph.Colaccino@nrc.gov>
Tracking Status: None
"Jaffe, David" <David.Jaffe@nrc.gov>
Tracking Status: None
"Wilson, Anthony" <Anthony.Wilson@nrc.gov>
Tracking Status: None
"Vrahoretis, Susan" <Susan.Vrahoretis@nrc.gov>
Tracking Status: None
"Ford, Tanya" <Tanya.Ford@nrc.gov>
Tracking Status: None
"Robert.Poche@unistarnuclear.com" <Robert.Poche@unistarnuclear.com>
Tracking Status: None
"cc3project@constellation.com" <cc3project@constellation.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	649	8/11/2011 2:47:51 PM
DRAFT RAI 317 RSRLB 5839.doc		35834

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

Request for Additional Information No. 317 (eRAI 5839)
DRAFT
8/11/2011

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016

SRP Section: 14.03.12 - Physical Security Hardware - Inspections, Tests, Analyses, and Acceptance
Criteria
Application Section: Part 10, ITAAC

QUESTIONS for Reactor Security Rulemaking and Licensing Branch (NSIR/DSP/RSRLB)

14.03.12-8

(U) Supplemental to RAI No. 197, Question, 14.03.12-5 – Part 10, Appendix B, ITAAC, Section 2, Table 2.2-1 – Physical Security ITAAC (Page 1-22 and 1-25), Revision 7: Update and verify that the descriptions of security ITAAC contained in Table 2.2-1 (i.e., design commitments, inspections, tests, and/or analyses (ITA), and acceptance criteria) meet prescriptive regulatory requirements of 10 CFR 73.55. Specifically, verify and revise descriptions of security ITAAC for the following:

- **(U)** Table 2.2-1, Item No. 5 description that include requirements of 10 CFR 73.55(e)(5) for the Secondary Alarm Station (SAS), SRP 14.3.12 Item No. 6;
- **(U)** Table 2.2-1, Item No. 6(a) description of acceptance criteria that include requirements of 10 CFR 73.55(g)(1)(B), SRP 14.3.12 Item No. 8(a);
- **(U)** Determine whether the ITTAC descriptions that address: (a) 10 CFR 73.55(i)(2) requirements for “at least two locations,” SAS, SRP 14.3.12 Item No. 11(a); (b) 10 CFR 73.55(i)(3)(i) for visual display and audible annunciation, at both CAS and SAS, SRP 14.3.12 Item No. 13(b); and (c) 10 CFR 73.55(j)(4) requirement for non-portable communications, SRP Item No. 16(c) are addressed as site specific security ITTAC, in Table 2.2-1, or standard U.S. EPR standard design security ITAAC, in Tier 1 Table 3.3-1 of the DCD.
- **(U)** Verify that Table 2.2-1 captured all remaining security ITAAC that are not addressed or are partially addressed in Table 3.1.1 of the U.S. EPR DCD to establish the necessary and sufficient security ITAAC (i.e., conforms to guidance of SRP 14.3.12) for meeting requirements of 10 CFR 52.80.

(U) Regulatory Basis: Subpart C, Title 10 CFR 52.80 requires that the application must contain the proposed inspections, tests, and analyses, and acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria are met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations. The NUREG 0800 SRP 14.3.12 (Revision 1, May 2010) provides the minimum acceptable physical security ITAAC based on prescriptive requirements of 10 CFR 73.55, which are necessary and sufficient for meeting the requirements of 10 CFR 52.80.

(U) The applicant response to RAI No. 197, Question No. 14.03.12-5, dated February 02, 2010, included plans to revise Table 2.2-1 to draft SRP 14.3.12 dated August 2009. The staff confirmatory review of revised Table 2.2-1, COLA Revision 7, identify site specific security ITAAC descriptions as described above based on guidance of SRP 14.3.12, Revision 1, dated May 2010. Also, the staff has identified and issued supplemental to RAI 42, Question No. 14.03.12-6, from confirmatory review of Revision

2 of the Tier 1 U.S. EPR DCD, which contain in parts or in whole the descriptions of security ITAAC that do not meet revised rule and/or conform to the SRP 14.3.12 dated May 2010, that must be resolved for information that will be incorporated by reference. On the basis that the combination of information incorporated by reference (i.e., Tier 1, Table 3.3-1) and site specific information in the COLA Part 10, Table 2.2-1, establishes the security ITAAC that are deemed necessary and sufficient for meeting 10 CFR 52.80 requirements and verification for 10 CFR 103(g) determinations, the staff requests the COL applicant to provide appropriate update and verify that the site-specific security ITAAC in Table 2.2-1, within the scope of the COLA, meet prescriptive regulatory requirements and conforms to guidance provided in NUREG 0800, SRP 14.03.12 dated May 2010 that described the necessary and sufficient security ITAAC.