



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 3, 2013

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Indian Point Energy Center  
450 Broadway, GSB  
P.O. Box 249  
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NOS. 1, 2 AND 3 - REQUEST  
FOR ADDITIONAL INFORMATION REGARDING REVISION 15 TO THE  
"PHYSICAL SECURITY, TRAINING AND QUALIFICATION, SAFEGUARDS  
CONTINGENCY PLAN, AND INDEPENDENT SPENT FUEL STORAGE  
INSTALLATION SECURITY PROGRAM"

Dear Sir or Madam:

By letter dated September 24, 2012, Entergy Nuclear Operations, Inc., the licensee, submitted Revision 15 to the Indian Point "Physical Security, Training and Qualification, Safeguards Contingency Plan, and Independent Sent Fuel Storage Installation Security Program."

The Nuclear Regulatory Commission staff is reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). Based on our discussions we understand that a response to the RAI will be provided by March 29, 2013.

Please contact me at (301) 415-1364 if you have any questions on this issue.

Sincerely,

A handwritten signature in black ink, reading "Douglas V. Pickett".

Douglas V. Pickett, Senior Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-003, 50-247, and 50-286

Enclosure:  
Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

REVISION 15 TO PHYSICAL SECURITY PLAN

ENTERGY NUCLEAR OPERATIONS, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NOS. 1, 2, AND 3

DOCKET NOS. 50-03, 50-247, AND 50-286

By letter dated September 24, 2012 (Agencywide Documents Access and Management System Accession No. ML12272A283), Entergy Nuclear Operations, Inc. submitted the Indian Point Energy Center Physical Security Plan (PSP), Training and Qualification Plan (T&QP), and Safeguards Contingency Plan (SCP), Revision 15. The enclosure to the letter contained Safeguards Information and has been withheld from public disclosure. The U.S. Nuclear Regulatory Commission (NRC) staff is currently reviewing the submittal to ensure compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(p)(2). The NRC staff has determined that the additional information requested below is needed to complete its review.

1. Section 15.1 of the PSP and Section 8 of the SCP describes illumination and alternative technology used by the security organization to augment illumination at the site. The third paragraph within Section 15.1 of the PSP identifies the types of alternative technology currently deployed at the site for protected area (PA) perimeter assessment during the loss of normal power and prior to the availability of back-up power. Section 8 of the SCP describes the use of low-light technology by armed responders to monitor the PA perimeter during the loss of off-site power. Describe how the currently deployed alternative technology provides the capability to perform PA perimeter assessment in no-light or low-light conditions and specifically during the loss of normal power. Describe how this alternative technology is integrated within the PA perimeter intrusion detection and assessment systems to meet the requirements of 10 CFR 73.55(e)(7)(i)(C), 10 CFR 73.55(i)(2), and 10 CFR 73.55(i)(3)(vii). See Security Frequently Asked Question 10-15. Additionally, appropriate changes should be made during the next revision of the site's security plans to ensure the language clearly describes how the alternative technology used to augment illumination for the assessment of the PA perimeter in no-light or low light conditions and during the loss of normal power meets the requirements of 10 CFR 73.55(e)(7)(i)(C), 10 CFR 73.55(i)(2), and 10 CFR 73.55(i)(3)(vii).

Regulatory Basis:

Consistent with 10 CFR 73.55(e)(7)(i)(C), the isolation zone shall be monitored with assessment equipment designed to satisfy the requirements of Section 73.55(i) and provide real-time and play-back/recorded video images of the detected activities before and after each alarm annunciation.

Consistent with 10 CFR 73.55(i)(2), 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.

Enclosure

Consistent with 10 CFR 73.55(i)(3)(vii), ensure intrusion detection and assessment equipment at the PA perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

Consistent with 10 CFR 73.55(c)(3), the licensee shall establish, maintain, and implement a PSP which describes how the performance objective and requirements set forth in this section will be implemented.

Consistent with 10 CFR 73.55(i)(6)(iii), the licensee shall describe in the security plans how the lighting requirements of this section are met and, if used, the type(s) and application of low-light technology.

2. Page B-8 of the site's T&QP, which contains weapons training and qualification information, is missing from the Revision 15 security plans that were submitted to the NRC. Submit Page B-8 of the site's T&QP to the NRC for inclusion in the site's security plans. The missing information should be submitted consistent with the protocols outlined in 10 CFR 50.4, "Written communications."

Regulatory Basis:

Consistent with 10 CFR 73.55(c)(1)(i), licensee security plans must describe how the licensee will implement requirements of this section through the establishment and maintenance of a security organization, the use of security equipment and technology, the training and qualification of security personnel, the implementation of predetermined response plans and strategies, and the protection of digital computer and communication system and networks.

Consistent with 10 CFR 73.55(c)(4), the licensee shall establish, maintain, and implement and follow a T&QP that describes how criteria set forth in Appendix of Part 73, "General Criteria for Security Personnel" will be implemented.

3. The Generic Planning Base within the site's SCP does not address all events that are identified within the NRC endorsed NEI 03-12, Revision 7, template for security plans. Event 21 that appears in the NEI 03-12, Revision 7 template is not addressed within the Generic Planning Base of the site's SCP. Describe the rationale for not including Event 21 within the site's Generic Planning Base. Describe whether Event 21 is addressed within the site's Responsibility Matrix Procedure. Additionally, appropriate changes should be made during the next revision of the site's SCP to ensure the site identifies pre-planned response objectives and required data for addressing the minimum safeguards contingency events consistent with the design basis threat of radiological sabotage as identified in the NRC endorsed NEI 03-12, Revision 7, template for security plans.

Regulatory Basis:

Consistent with 10 CFR 73.55(c)(5), the licensee shall establish, maintain, and implement a SCP that describes how the criteria set forth in Appendix C, to this part, "Licensee Safeguards Contingency Plans," will be implemented.

Consistent with 10 CFR Part 73, Appendix CII, B.2, licensees shall define the criteria for initiation and termination of responses to security events to include the specific decisions, actions, and supporting information needed to respond to each type incident covered by the approved safeguards contingency plan.

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/ra/

Douglas V. Pickett, Senior Project Manager  
Plant Licensing Branch I-1  
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**ADAMS ACCESSION NO.: ML13022A153**

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