

August 13, 2014

Mr. Ronald A. Jones, Vice President
New Nuclear Operations
South Carolina Electric & Gas Company
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Mr. B. L. Ivey, Vice President
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
40 Inverness Center Parkway, B022
Birmingham, AL 35242

SUBJECT: CLARIFICATION OF THE SAFETY/SECURITY INTERFACE REQUIREMENTS
PRIOR TO THE TITLE 10 OF THE *CODE OF FEDERAL REGULATIONS*,
PART 52.103(G) FINDING

Dear Messrs. Jones and Ivey:

The purpose of this letter is to clarify the agency requirements to evaluate the potential impact of changes during construction on your security licensing basis. Title 10 of the *Code of Federal Regulations*, Section (§) 73.58 establishes requirements for licensees to assess and manage the potential for adverse effects on safety and security, including the site emergency plan, before implementing changes to plant configurations, facility conditions, or security. The requirements of § 73.58 do not apply to combined license (COL) holders prior to operation, i.e., the Commission's § 52.103(g) finding. However, §73.55(b)(4) requires licensees to "analyze and identify site-specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of this section and shall account for these conditions in the design of the physical protection program."

At the time of issuance of the COL for Virgil C. Summer Nuclear Station, Units 2 and 3, and Vogtle Electric Generating Plant, Units 3 and 4, the staff approved the licensing basis for the security plan in Section 13.6 of the Final Safety Analysis Report (FSAR), which incorporated by reference Section 13.6 of the AP1000 design control document (DCD), Revision 19 and included the Security Safeguards Information (SSI) documents referenced therein.

Pursuant to § 73.55(b)(4), licensees must ensure that the security program/plan takes into account site-specific information (including the as-built plant) prior to implementation of the security plan. The requirements for such assessment apply to all changes whether they are part of a license amendment request (LAR) or are being made without NRC review. This means that the licensee should have processes in place to analyze the effect that changes to site-specific conditions may have on the security plan/program prior to the plan's

R. A. Jones
B. L. Ivey

-2-

implementation. The staff has completed review of at least two LARs in which such evaluations were necessary, and the staff requested additional information to evaluate the proposed change. The staff expects sufficient information to be contained in future LARs describing how the change affects site-specific conditions and how the licensee plans to account for the changed conditions in the security program.

If you have any questions, please contact Denise McGovern at (301) 415-0681 or Denise.Mcgovern@nrc.gov.

Sincerely,

/RA Mark Delligatti for:/

Frank Akstulewicz, Director
Division of New Reactor Licensing
Office of New Reactors

Docket No(s): 52-025
52-026
52-027
52-028

cc: See next page

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-2-

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Frank Akstulewicz, Director
Division of New Reactor Licensing
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(Revised 06/05/2014)

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(Revised 06/03/2014)

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