



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

May 3, 2016

Mr. George A. Lippard, III
Vice President, Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88, Mail Code 800
Jenkinsville, SC 29065

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1 – REQUEST FOR
ADDITIONAL INFORMATION REGARDING THE STATION PHYSICAL
SECURITY PLAN, REVISION 14

Dear Mr. Lippard:

By letter dated January 4, 2015, South Carolina Electric & Gas Company (SCE&G), submitted Virgil C. Summer Nuclear Station Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 14. 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*, Section 50.54(p)(2).

The NRC staff has determined that additional information is needed to continue the review as discussed in the Enclosure. We request that SCE&G respond to this request within 30 days of the date of this letter.

Sincerely,

A handwritten signature in cursive script that reads "Shawn Williams".

Shawn Williams, Senior Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-395

Enclosure:
Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION

10 CFR 50.54(p)(2) CHANGES TO SECURITY PLAN

VIRGIL C. SUMMER NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-395

By letter dated January 4, 2016, (Agencywide Documents Access and Management System Accession No. ML16050A419), South Carolina Electric & Gas Company (the licensee), submitted Virgil C. Summer Nuclear Station Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 14. 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) Figure 1 shows an outline of the Protective Area (PA) expansion, etc.
 - a. Provide a summary of site-specific analysis that establishes the design basis for the existing Vehicle Barrier System (VBS) which requires minimum safe stand-off distance bounding for the Independent Spent Fuel Storage Installations, and describe how it is bounding for the minimum safe stand-off distances for any changes to required safety/security-related systems, structures, and armed responder fighting positions.
 - b. If armed responder fighting positions were changed; 1) address the site reconfiguration and effectiveness for interdiction and neutralization functions due to expansion of the PA; 2) describe the methodology applied in evaluation of security positions to establish the required minimum safe stand-off distances that protect armed responders from the coordinated vehicle bomb attacks; and 3) indicate whether the evaluation applied the method found in the updated NUREG/CR06190, March 17, 2004, or other method (e.g., finite structural analysis) to establish the design basis that the VBS is located at an adequately bounding distance to protect and ensure survivability of security personnel from blast pressures, and from any secondary effects, (e.g., projectiles) of a Design Basis Threat vehicle bomb.
 - c. Describe how the changes continue to provide high assurance for continuous detection and delay functions (i.e., installation of detection/assessment, and light systems, and configurations of barriers of expanded detection and assessment

Enclosure

systems and physical barriers) and the interdiction and neutralization functions (i.e., fields of fire and line of sights) for the newly reconfigured sector of the PA.

- d. Figure 1 outline also identifies the newly added structures to this revision. As compared to Figure 8, it appears that not all newly added structures were provided in Figure 1. Provide an updated Figure 1 drawing to accurately identify all new structures added to the PA.
- e. As compared to Revision 14, Figure 8, and Revision 13, Figures 1 and 8, also appears that a portion of the Primary Vehicle Barrier System was omitted from the upper right hand corner of Figure 1. Provide an explanation of this VBS omission.

Regulatory Basis:

10 CFR 73.55(b)(3)(ii) - 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.

10 CFR 73.55(4) - The licensee shall 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.

10 CFR 73.55(e) - *Physical barriers*. Each licensee shall identify and analyze site-specific conditions to determine the specific use, type, function, and placement of physical barriers needed to satisfy the physical protection program design requirements of § 73.55(b).

10 CFR 73.55(e)(1)(ii) - Describe in the physical security plan, physical barriers, barrier systems, and their functions within the physical protection program.

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/RA/

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