

NRR-DMPSPeM Resource

From: Klett, Audrey
Sent: Thursday, August 2, 2018 5:21 PM
To: Wasik, Christopher J
Subject: NRC Request for Additional Information - Oconee LAR 2018-01 (EPID L-2018-LLA-0042)

Chris,

By letter ONS-2018-014 dated February 12, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18046A080), Duke Energy Carolinas, LLC (the licensee) submitted License Amendment Request (LAR) No. 2018-01 for the Oconee Nuclear Station (Oconee). The licensee applied for changes to the Duke Energy Physical Security Plan (PSP) under the provisions of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.90, "Application for amendment of license, construction permit, or early site permit." In its application, the licensee stated that it is voluntarily proposing these changes to further increase the margin of protection for certain associated components and equipment whenever the Standby Shutdown Facility (SSF) is declared inoperable.

The U.S. Nuclear Regulatory Commission (NRC) staff determined that the following requests for additional information (RAIs) are necessary to complete processing of LAR No. 2018-01. The NRC staff emailed a draft of the RAIs to the licensee on May 23, 2018, and had a clarification call with the licensee on June 13, 2018. As indicated previously in the first set of RAIs sent to you on July 6, 2018 (ADAMS Accession No. ML18192A202), the staff identified an additional RAI that it would send separately. The staff emailed that additional draft RAI to you on July 30, 2018, and per the licensee's staff email dated August 2, 2018, the licensee did not need a clarification call. The set of RAIs below are renumbered from the draft RAIs sent to you on May 23, 2018, include the additional RAI, and continue sequentially from the RAIs sent to you on July 6, 2018. As previously mentioned by Mr. Samuel Adams per his email dated August 2, 2018, the NRC staff requests the licensee to respond to the RAIs in this email on or by August 23, 2018.

RAI-18

In its application, the licensee states that the physical inspection and search of predetermined areas will be conducted for indications of tampering and for firearms, explosives, and incendiary devices prior to entering predetermined site conditions. The NRC staff requests the licensee to clarify whether the criteria and procedures to be used for the conduct of this physical inspection and search are the same or different than those used for other facility areas for which this type of inspection and search activity is required.

RAI-19

In its application, the licensee states that the search of all personnel, packages, materials, and vehicles for firearms, explosives, and incendiary devices will be conducted prior to granting access to predetermined facility areas. The NRC staff requests the licensee to clarify whether the criteria and procedures to be used for the conduct of this search activity are the same or different than those used for other facility areas for which these types of search activities are required.

RAI-20

In its application, the licensee states that all accessible portals leading to predetermined areas shall be provided with an intrusion detection (alarm) system that annunciates in the Oconee central alarm station (CAS) and secondary alarm station (SAS); however, elsewhere in the application, the licensee states that portal alarms will also annunciate on a local alarm panel. The NRC staff requests the licensee to clarify the locations

in which portal alarms will annunciate, how alarms will be assessed, and how response to alarms will be initiated and controlled.

RAI-21

In its application, the licensee states that CAS and SAS operators shall assess duress and portal alarms and, as necessary, direct a response. However, the licensee did not describe the methodology to be used to perform the assessment function. Therefore, the NRC staff requests the licensee to clarify the methodology and type of equipment or personnel the licensee will use to accomplish this alarm assessment function and if used, the location at which video images may be displayed.

RAI-22

In its application, the licensee states that all individuals granted access into predetermined areas shall be badged except under emergency conditions; elsewhere in the application, the licensee specifies that only those individuals with a legitimate business need will be granted access; and then elsewhere in the application, the licensee states that only individuals who are authorized unescorted access to the Ocone protected area and are authorized by site management will be granted unescorted access into predetermined areas. The NRC staff requests the licensee to clarify the criteria and procedures that will be used to determine what constitutes "authorized" access to predetermined areas when certain equipment is declared inoperable. The NRC staff requests the licensee to include a description of how personnel responsible for access control will identify authorized personnel, and how they will validate an individual's authorization to access predetermined areas, including a description of whether the criteria and procedures are the same as those used for unescorted access authorization to other facility areas for which access control requirements apply.

RAI-23

In its application, the licensee states that all visitors shall be escorted by licensee personnel who are authorized unescorted access into predetermined areas, and that escort-to-visitor ratios will not exceed those specified by licensee management in site procedures. The NRC staff requests the licensee to clarify what is meant by site procedures and whether the site procedures to include escort training and qualification, as referenced in the submittal, are the same or different than those used for other facility areas for which escort requirements, escort training and qualification, and escort-to-visitor ratios apply.

RAI-24

In its application, the licensee states that vehicles with specific access needs shall be allowed access as specified by facility procedures. The NRC staff requests the licensee to clarify what is meant by site procedures and whether the site procedures (as referenced in the submittal) are the same or different than those used in other facility areas for which vehicle search is required. If these are different procedures, The NRC staff requests the licensee to specify the programmatic elements that will be covered in a site procedure specific to the area and activity being addressed. Additionally, the NRC staff requests the licensee to clarify the timeframe that search activities will be performed, the location where search will be performed, the vehicle search criteria to be used, the methodologies that will be used, the vehicle areas to be searched, the number of personnel conducting the search, the alarm notification method, and monitoring locations.

RAI-25

The NRC staff requests the licensee to clarify the training and qualifications that must be met by personnel assigned to perform escort duties in predetermined locations when certain equipment is declared inoperable.

RAI-26

The NRC staff requests the licensee to describe the conditions (if any) for which the licensee would implement the two-person line-of-sight rule for predetermined areas when certain equipment is declared inoperable.

RAI-27

On page 5 of 10 of the application, in the Section titled, "Response Requirements," the licensee described specific security measures that are implemented during certain periods where specific equipment is inoperable as *compensatory* measures [emphasis added] however, in other locations of the application, the same security measures are described as *additional* security measures [emphasis added]. In order for the NRC staff to develop its safety evaluation, the NRC requests the licensee to clarify whether all measures described in the LAR are intended to be compensatory measures as described in 73.55(o), or whether they are "additional measures" intended to enhance the overall physical protection program capabilities.

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"Wasik, Christopher J" <Christopher.Wasik@duke-energy.com>
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