

PUBLIC COMMENTS AND RESPONSE AND RESOLUTION ON SRP 16.3.2

Section	Location	Comment	Response and Resolution
NEI Note to Reviewer	N/A	NEI: The industry review and comments were conducted based on the redline-PDF version of the proposed draft; therefore, page numbers, sections, etc. refer to this version of the document.	No response required.
General Comment No. 1	N/A	<p>NEI: There are sections that clearly define that the scope of this review plan applies to review of design certification (DC); however, the referencing of the Combined Operating License (COL), references to Part 50 and incorporation of reviews that are clearly outside of the scope of Section 13.6.2, create confusion.</p> <p>Recommendation: Recommend revising language as necessary throughout the document to only address information directly related to the DC for the nuclear island in new plant construction and any additional information outside of the nuclear island will be addressed in the COL review (Section 13.6.1 of the Standard Review Plan (SRP)).</p>	<p>The staff disagrees with the general comment and recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict an applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>(2) The 10 CFR Part 73 requirements for a nuclear power reactor are applicable for licensing applications under provisions of 10 CFR Part 50 and 10 CFR Part 52 (e.g., OL, DC, and COL). An application for a COL or an OL may reference a certified design (i.e., incorporate by reference) or may be a standalone COL or OL that does</p>

			<p>not reference any certified design. Both must address how physical security designs will meet the requirements of 10 CFR Part 73. SRP Section 13.6.2 provides staff guidance for licensing review of the design descriptions on how the requirements in 10 CFR Part 73, in either in a design certification and operating license application.</p> <p>The staff will revise the SRP to add the following for clarification on the applicability of staff guidance for operating license applications in Section I, "Area of Review:"</p> <p style="padding-left: 40px;">This SRP section provides staff guidance for the review of physical security system designs meeting the regulatory requirements in 10 CFR Part 73. Therefore the applicability of guidance in this SRP addressing the specific requirements in 10 CFR Part 73 are not limited only to the review of a DC application under the provision of Subpart B to 10 CFR Part 52, but are also applicable in the review of a COL or an OL application, under the provisions of Subpart C of 10 CFR Part 52 or 10 CFR Part 50, respectively.</p> <p>(3) With respect to SRP Section 13.6.1, the staff planned revision will address interface with SRP Section 13.6.2 for reviewing the same requirements applicable to a COL or OL. This minimizes duplications of guidance for the review of physical security systems designs. Section I, Scope of the Technical Review for Physical Security, Item 6, adequately discuss this subject.</p>
General Comment No.2	N/A	<p>NEI: The scope of this review plan is bounded by "Physical Security Systems within the Nuclear Island and Structures for a Design Certification Application" as described in Section 3 of the "Scope of the Technical Review for Physical Security". Multiple sections need to be revised or eliminated that refer to equipment and systems that reside outside the nuclear island. Constantly</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a part of the</p>

		<p>referring to 10 CFR 73.55(b), which is broad-based general performance criteria, causes confusion on what the DC applicant needs to address. The document discusses the integration of reviews under Section 13.6.1 to complete the reviews necessary to determine the overall objectives of 10 CFR 73.55(b) are met. It is unnecessary to include reviews in Section 13.6.2 outside of the information in the DC.</p> <p>NEI: Recommend revising Section 13.6.2 of the SRP to only review those security systems and structures specifically defined in 10 CFR 73.55 related to the nuclear island (e.g., vital area access control).</p>	<p>standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>(2) The SRP 13.6.2 guidance addresses all design requirements in 10 CFR Part 73 that are applicable to a nuclear power reactor, regardless of whether they are being addressed in an application for a certified design or in an application for an operating license (COL or OL). A certified design does not provide regulatory findings on the design of physical security systems that are outside of the nuclear island and structures, if the scope is limited as such. The remaining designs features are address in an applicant for an operating license. Therefore interface between SRP Section 13.6.1, as indicated, is necessary minimize duplication of guidance for the review of physical security systems designs meeting requirements in 10 CFR Part 73.</p> <p>(3) With respect to 10 CFR 73.55(b), the performance requirements to protect against threat up to the DBT for radiological sabotage is achieved with adequate designs of engineered systems providing detection, assessment, and interdiction and neutralization (response) functions. The guidance in SRP 13.6.2 address the review of all prescriptive requirements in 10 CFR 73.55 for the designs of these physical security systems, structures, and components required in meeting the performance requirements of 10 CFR 73.55(b).</p>
<p>General Comment No.3</p>	<p>N/A</p>	<p>NEI: Section 13.6.2 of the SRP should only review licensing regulations and approaches established in 10 CFR Part 52. Submittals in accordance with 10 CFR Part 50 should be reviewed under other sections of the SRP (e.g.,</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p>

		<p>13.6.1). DCs would not be submitted under Part 50. Reference Standard Design Certification or Design Certification in 10 CFR 52.1, Definitions which states the DCs are clearly addressed under subpart B of 10 CFR 52.</p> <p>NEI: Recommend removing all references to 10 CFR Part 50.</p>	<p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., under provisions of 10 CFR Parts 50 or 52). Therefore, reference to 10 CFR Part 50 is appropriately included to address applicability for licensing reviews.</p> <p>(2) The commenter is correct that a DC application is submitted in accordance with provision of Subpart B of 10 CFR Part 52 and a DC is not submitted under the provision of 10 CFR Part 50. However, OL application submitted under 10 CFR Part 50 may reference a certified design (i.e., incorporate by reference) and thereby addressed the physical security system designs that are within the scope of the DC (i.e., final and not subject to further reviews in an OL application). The assumption that SRP Section 13.6.1 provides staff guidance only for the review of an OL is incorrect. The staff guidance in both SPR Sections 13.6.1 and 13.6.2 are based on requirements of 10 CFR Part 73 for a nuclear reactor, regardless of the licensing process chosen (10 CFR Parts 50 or 52) for licensing.</p>
<p>General Comment No.4</p>	<p>N/A</p>	<p>NEI: Based on the scope of the SRP, any reference to operating reactors should be removed. There are already a number of regulatory review processes in place for operating reactors when changes to physical security are made (e.g., 50.54(p), 50.90, NRC endorsed NEI 11-08, etc.).</p> <p>NEI: Recommend removing references to operating reactors in order to remain within the scope of Section 13.6.2 of the SRP.</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p> <p>(1) The performance and prescriptive requirements of 10 CFR Part 73 are applicable to a nuclear power reactor licensed under provisions of 10 CFR Parts 50 and 52. Also, the guidance is not limited to only new reactor application. The recommendation to remove reference to 10 CFR Part 50 or operating reactors is not appropriate because the SRP Section 13.6.1 address the requirements of 10 CFR Part 73.</p> <p>(2) Regarding licensing change control processes establish by provisions of 10 CFR 50.54(p)(2) and</p>

			<p>10 CFR 50.90 are for changes to licensing bases (i.e., captured in security plans, FSAR, EPlan, etc.) with or without prior NRC approval. NRC guidance and accepted industry guidance for such licensing processes are not substitute for the staff guidance in this SRP section for review of compliance with requirements of 10 CFR Part 73.</p>
<p>NEI General Comment No.5</p>	<p>N/A</p>	<p>NEI: Some sections of the SRP incorrectly apply 10 CFR Part 73.55 requirements to areas not originally intended by the rule (e.g., application of ‘assessment’ for ‘interior IDS’). In the example given there is no rule requirement for this application.</p> <p>NEI: Recommend an evaluation of the rule for new plant design to ensure proper rule compliance application.</p>	<p>The staff disagrees with the general comment and recommendation.</p> <p>Basis:</p> <p>(1) The prescriptive requirements in 10 CFR 73.55 establish generic and specific design requirements for physical security systems providing detection, assessment, interdiction and neutralization functions. The design requirements detection functions are not limited to exterior applications and are applicable to interior intrusion systems providing detection functions in the design of a physical protection system required to achieve high assurance of adequate protection against the DBT. For example, the requirements of 10 CFR 73.55(i), detection and assessment, applies to “intrusion detection and assessment systems that satisfy the design requirements of 73.55(b), and provide, at all times, the capability to detect and assess unauthorized persons and facilitate the effective implementation of the licensee’s protective strategy.” The generic detection and assessment requirements apply to systems provided at the outer layer (i.e., the PA perimeter and the OCA) as well as inner layer (i.e., within the nuclear island and structures) to detection and assessment functions to enable security response.</p> <p>(2) The review of the statement of considerations for the revision to 10 CFR Part 73 issued in March 2009 did not reveal that the generic requirements in 10 CFR 73.55 for physical security system designs are limited to only exterior area or application. Where specified in the regulation certain requirements are only applicable to</p>

			specific to areas or a specific application. Otherwise, the requirements are generically applicable and not limited to a specific areas or applications.
General Comment No.6	N/A	<p>NEI: No comment provided.</p> <p>Recommendation: Recommend there be a paragraph early in the SRP that describes that the documents submitted are safeguards information and should be handled accordingly.</p>	<p>The staff agrees with the general comment and the recommendation. Although SRP 13.6.2 is not intended to address review of submittal of applications for compliance with requirements for protection of safeguards information under the provisions of 10 CFR 73.21 and 10 CFR 73.22, the insertion of text as recommended is reasonable to ensure required protection of safeguards information.</p> <p>The following will be inserted in the revision in Section I of SRP Section 13.6.2:</p> <p style="padding-left: 40px;">“7. The descriptions of details for the design of physical security systems, including drawings, diagrams, and figures in the license application must be in accordance with requirements of 10 CFR 73.21, Protection of Safeguards Information: Performance Requirements, and 10 CFR 73.22, Protection of Safeguards Information: Specific Requirements for protection of safeguards information.”</p>
General Comment No.7	N/A	<p>NEI: Due to the vast amount of rewrite to this SRP it would be beneficial to see a clean version once all comments are resolved.</p>	<p>The final SRP Section 13.6.2 will reflect required resolutions to all public comments.</p>
General Comment	N/A	<p>Friend of the Earth:</p> <p>Though the issue I will raise here may not be considered totally appropriate for the docket at hand, it is worthy of consideration in this docket as well as others pertaining to nuclear power plant safety for both old reactors and new reactors under construction.</p> <p>In considering the safe operation of nuclear power plants, it has come to my attention that cooling</p>	<p>The subject of this general comment is outside the scope of preparing staff guidance for review of compliance with requirements of 10 CFR Part 73 for the designs of physical security systems. The subject may be appropriate for a petition for rulemaking under provisions of 10 CFR 2.206, “Requests for action under this subpart.”</p>

		<p>water circulation systems may be vulnerable to nefarious acts leading to reactor shutdown.</p> <p>In particular, the cooling towers outside the protected area pose a risk to reactor operation in the event of attack that could disable the functioning of the cooling towers. I thus request that the status of cooling towers and their vulnerability to attack and protection of them be considered in this docket.</p>	
Cover page	Cover page	<p>NEI: Change to the title of this section also impacts NUREG 0800 introduction on page 7 which references this SRP subsection # and title.</p> <p>Recommendation: Recommend updating SRP 0800 Introduction with this revision.</p>	<p>The staff agrees with the comment and the recommendation. The revision to NUREG 0800 introduction that referencing SRP Sections 13.6.2 will be revised to reflect the final title, “Physical Security — Review of Physical Security System Designs – Standard Design Certification and Operating Reactor Licensing Applications.”</p>
Secondary reviewer section	Cover page	<p>NEI: Includes wording: “in the attached sample final safety analysis report Table 13.4-x” Did not see this sample in this draft SRP.</p> <p>Recommendation: Verify/correct.</p>	<p>The staff agrees with the comment and the recommendation. The wording is revised accordingly to delete “attached” and only reference to the sample final safety analysis report Table 13.4-x. [VERIFY Table 13.4-X]</p>
Title	cover page	<p>NEI: For the title, remove reference to operating reactors.</p> <p>Recommendation: Same as general comment #4.</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis: The requirements (i.e., performance and prescriptive requirements) of 10 CFR Part 73 are applicable to a nuclear power reactor licensed under provisions of 10 CFR Parts 50 and 52. Also, the guidance is not limited to new reactor application. The recommendation to remove reference to 10 CFR Part 50 or operating reactor is not appropriate because the staff guidance address the requirements of 10 CFR Part 73, which applies to application and licensed facilities under either licensing processes of 10 CFR Parts 50 or 52</p>

<p>Section I, Areas of Review (Scope of the Technical Review for Physical Security)</p>	<p>Page 13.6.2-3</p>	<p>NEI: The introduction section of the SRP does not match the description of this paragraph accurately. The paragraph below indicates that the risk informed framework may not apply to the review of programmatic... The intro to the SRP does not say "may", it says it does not with an explanation that risk informed framework does not apply to programmatic, procedural, organizational, or other topics because PRA methods are not mature enough to apply to non-SSC's. Suggest the following changes to match the SRP intro section.</p> <p>As stated in SECY-11-0024, "Use of Risk Insights To Enhance the Safety Focus of Small Modular Reactor Reviews," dated February 18, 2011, the level of review for a particular SSC is derived from both the SSC's safety importance (i.e., safety-related or non-safety-related) and risk significance. The introduction to NUREG-0800, Part 2 II, describes the licensing review philosophy and framework the NRC staff applies for new reactor design certification and combined license applications under 10 CFR Part 52. The introduction states that the risk-informed review framework is applicable to the review of all SSCs, but it does may not apply to the review of programmatic, procedural, organizational, or other topics. , which, because of their safety or risk significance, are reviewed at the appropriate level determined by the technical branches performing the reviews. For example, the program or topical area may address regulatory requirements not amenable to a risk-informed approach (i.e., conditional risk with a probability equal to one). In the case of physical security, the review framework involves performance and prescriptive regulatory requirements that do not incorporate risk significance and address protection against</p>	<p>The staff agrees with the comment and the recommendation. [VERIFY Introduction to NUREG 0800]</p>
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Section I, Areas of Review (Scope of the Technical Review for Physical Security)	Page 13.6.2-3, Bullet No.2	<p>NEI: Suggest defining the acronym DBT as this is the first use of this term.</p> <p>Recommendation: See suggestion.</p>	The staff agrees with the comment and the recommendation. Revision of SRP Section 13.6.2 defines the design basis threat for the acronym of DBT.
Section I, Areas of Review (Scope of the Technical Review for Physical Security)	Page 13.6.2-3, Bullet No.2	<p>NEI: Section states, "...includes design of physical protection systems (i.e., detection, assessment, communications, and response)..." "Response" is not a system and does not apply to this paragraph.</p> <p>Recommendation: Suggest revising the text to "...includes design of physical protection systems (i.e., detection, assessment, communications, and systems within the nuclear island necessary to enable a response)..."</p>	<p>The staff agrees in part with comment and the recommendation. The recommended text is edited to indicate the following:</p> <p style="padding-left: 40px;">". . . includes the design of physical protection systems providing detection, assessment, communications, delay and response functions, which . . . "</p> <p>The scope of the design certification is not limited to the nuclear and structures.</p>
Section I, Areas of Review (Scope of the Technical Review for Physical Security)	Page 13.6.2-3, Bullet No.3	<p>NEI: The title of the table referenced at the bottom of this page on the last paragraph does not match the actual title of the table on the following page.</p> <p>Recommendation: Revise wording to ensure table title is consistent with Section 3, page 3 "Design of Physical Security Systems within the Nuclear Island and Structures for a Design Certification Application".</p>	The staff agrees with comment and the recommendation. The reference to Table 13.6.21 will be revised to match the title shown on Table 13.6.21
Section I, Areas of Review (Scope of Review)	Page 13.6.2-4, Bullet No.3	<p>NEI: The reference to operating license should be removed from the first paragraph.</p>	The staff disagrees with the general comment and the recommendation.

of the Technical Review for Physical Security)		Recommendation: Refer to general comment #4.	Basis: The performance and prescriptive requirements of 10 CFR Part 73 are applicable to a nuclear power reactor licensed under provisions of 10 CFR Parts 50 and 52. Also, the guidance is not limited to new reactor application. The recommendation to remove reference to 10 CFR Part 50 or operating reactor is not appropriate because the staff guidance address the requirements of 10 CFR Part 73, which applies to application and licensed facilities under either licensing processes of 10 CFR Parts 50 or 52.
Section I, Areas of Review (Scope of the Technical Review for Physical Security)	Page 13.6.2-4, Bullet No.3	NEI: The references to security response and insider threats are not clearly defined in relation to Security systems design. Recommendation: Recommend additional wording to provide clarification that the review is of systems to support these functions or eliminate the references from the text.	The staff agrees with comment and the recommendation. The text will be revised to incorporate previous comment regarding response and additional clarification to indicate review of design descriptions for physical security systems relied on to protect against insider threat.
Section I, Areas of Review (Table 13.6.2.1)	Page 13.6.2-6, Item No.15	NEI: Unauthorized persons may or may not constitute an “insider threat.” Recommendation: Delete “(e.g. insider threat)”	The staff agrees with comment and the recommendation. The SRP will be revised to delete “(e.g., insider threat).”
Section I, Areas of Review (Table 13.6.2.1)	Page 13.6.2-6, Item No.15	NEI: “. . . and facilitate interior security response” does not completely align with the wording within 10 CFR 73.55(i)(1). Recommendation: Revise to align with 10 CFR 73.55(i)(1) as: “and facilitate the effective implementation of the licensee’s protective strategy.”	The staff agrees with comment and the recommendation. The text will be revised to indicate “. . . initiate and facilitate interior security response for effective implementation of a protective strategy.”
Section I, Areas of Review (Table 13.6.2.1)	Page 13.6.2-6, Item No.16	NEI: Reference to having “interior” “video assessment displays” implies that video monitoring capability would be required for all interior security alarm points. This is not currently required at operating power reactors and should	The staff disagrees with comment and the recommendation. Basis:

		<p>not be required of new plant designs, including SMRs. As worded, this could have far reaching back-fit impacts on operating power reactors.</p> <p>Recommendation: Delete the specific reference to interior video assessment or specify, "if video technology is applied" as described on p. 54, in Section 2.36.</p>	<p>(1) The applicability of prescriptive requirements specific to design of physical security systems depends if they are provide in the design of a physical protection system to meet the performance requirements of 10 CFR 73.55(b). The prescriptive requirements for design of physical security systems in 10 CFR 75.55, including 10 CFR 73.55(i), applies generically to systems that are required (i.e., credited) in meet the performance requirements of 10 CFR 73.55(b).</p> <p>(2) The revised security rule codified NRC orders that are based on adequate protection and considered operating experiences from implementing security enhancements after the events of September 11, 2001. The technical basis and regulatory analysis considered back-fit and adequate protection for the final revised rule issued in March 2009. This SRP staff guidance are within the regulatory basis and do not impose additional requirements.</p>
Section I, Areas of Review (Table 13.6.2.1)	Pages 13.6.2-7 and 13.6.2-8, Item No.23	<p>NEI: This section of the table should include the note stating "descriptions need not be included if criterion 3(a) or 3(b) is applicable."</p> <p>Recommendation: Revise to include this wording.</p>	<p>The staff agrees with the comment and recommendations. Item 23 will be revised to include the following:</p> <p style="text-align: center;">Note: Descriptions need not be included if criterion 3(a) or 3(b) is applicable."</p>
Section I, Areas of Review (Scope of the Technical Review for Physical Security)	Page 13.6.2-8 Bullet Nos.5 and 6	<p>NEI: These sections reference "Table No. 13.6.2.2", which applies to Appendix A of Section 13.6.1 to NUREG 0800 and should be removed. Placing temporary guidance for another section of the NUREG is an undesirable practice that introduces confusion and potential error traps for both license applicants and reviewers.</p> <p>Recommendation: Recommend sections 5, 6 and the associated Appendix A be removed from 13.6.2 and section 13.6.1 be revised as soon as practical.</p>	<p>The staff agrees with the comment and recommendation.</p> <p>Basis:</p> <p>The SRP Section 13.6.2 addresses all design requirements in 10 CFR Part 73 that are applicable to a nuclear power reactor, regardless of whether they are being addressed in an application for a certified design or in an application for an operating license (COL or OL). Therefore interface between SRP Section 13.6.1, as indicated, is necessary to minimize duplications of guidance for the review of physical security systems designs meeting design requirements in 10 CFR Part 73.</p>

			The revision to SRP Section 13.6.1 will address the interface required.
Section I, Areas of Review (Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC))	Pages 13.6.2-8 to 13.6.2-9	<p>NEI: What does “address appropriately within the DC application with respect to the PS ITAAC” mean? As written, it could be interpreted that SRP 14.3.12 will not be reviewed as part of the scope of this SRP. Is this correct?</p> <p>Recommendation: Please condense and simplify this section to provide more clarification.</p>	<p>The commenter is correct in that this SRP Section 13.6.2 do not address physical security ITAAC. SRP Section 14.3.12, Physical Security ITTAC, “Physical Security Hardware–ITAAC,” provides the staff guidance for the review. Physical security ITAAC is address in Chapter 14, Verification Program of the FSAR and not within Chapter 13, Conduct of Operations, which include the physical security.</p> <p>Regarding the recommendation, only a minor change is made, because the text in this section already explicitly states this. Minor edit is provided to clarify that the evaluation of PS-ITAAC are not within the scope of the review of physical security system designs that is addressed in SRP Section 13.6.2. .</p>
Section I, Areas of Review (COL Information Items, Certification Requirements, and Restrictions)	Page 13.6.2-9	<p>NEI: This section references Table 1. Table 1 has been renamed as 13.6.2.1.</p> <p>Recommendation: Recommend changing “Table 1” to 13.6.2.1.</p>	The staff agrees with the comment and recommendation. Revision will state Table 13.6.2.1.
Section I, Area of Review (Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC))	Page 13.6.2-9	<p>NEI: Revision proposes to drop the ‘s’ from “inspections” when in fact it should be left alone.</p> <p>Recommendation: Observation</p>	The staff considered the observation, and reviewed the need to retain “s” after inspections.
Section I, Area of Review (Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC))	Pages 13.6.2-9 and 13.6.36	<p>NEI: Reference to table 2, which is Appendix A, should be removed; see above comment to Page 9, Section 5.</p> <p>Recommendation: Refer to general comment #3.</p>	<p>The staff disagrees with this and the general comment No.3 and the recommendation.</p> <p>Basis:</p> <p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR</p>

			<p>Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., 10 CFR Parts 50 or 52).</p> <p>(2) The SRP 13.6.2 guidance address all design requirements in 10 CFR Part 73 that are applicable to a nuclear power reactor, regardless of whether they are being addressed in an application for a certified design or in an application for an operating license (COL or OL). Therefore interface between SRP Section 13.6.1, as indicated, is necessary to minimize duplications of guidance for the review of physical security systems designs meeting design requirements in 10 CFR Part 73. The revision to SRP Section 13.6.1 will address the interface required.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Page 13.6.2-17 Bullet No.2	<p>NEI: Clarification should be provided that “the facility areas” referred to are restricted to the nuclear island.</p> <p>Recommendation: Recommend rewording as follows, “As it relates to the design of physical barrier systems, their uses, type, functions, and placement in the nuclear island, to satisfy the capabilities for control and delay of access. The design descriptions should provide sufficient detail of how the following criteria are met:”</p>	<p>The staff disagrees with the comment and the recommendation,</p> <p>Basis: The requirements of 10 CFR 73.55(e) for physical barrier systems, their use, types, functions, and placements, is not restricted to the nuclear island and applies placement in all plat area. However, use of facility will be changed to “plant” areas (e.g., nuclear island, protected area, owner control areas) reflect application of requirements of 10 CFR 73.55(e) for physical barriers.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Page 13.6.2-17, Bullet No.2, Item G	<p>NEI: Section G refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing Section G.</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I,</p>

			<p>Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>(2) The SRP 13.6.2 guidance address all design requirements in 10 CFR Part 73 that are applicable to a nuclear power reactor, regardless of whether they are being addressed in an application for a certified design or in an application for an operating license (COL or OL). A design certification does not provide regulatory findings on the design of physical security systems that are outside of the nuclear island and structures, if the scope is limited as such. The remaining designs features are address in an applicant for an operating license. Therefore interface between SRP Section 13.6.1, as indicated, is necessary to minimize duplication of guidance for the review of physical security systems designs meeting design requirements in 10 CFR Part 73.</p> <p>(3) With respect to 10 CFR 73.55(b), the performance requirements to protect against threat up to the DBT for radiological sabotage is achieved with adequate designs of engineered systems relied on for detection, assessment, and interdiction and neutralization (response) functions. The guidance in SRP 13.6.2 address the review of all prescriptive requirements in 10 CFR 73.55 for the designs of these physical security systems, structures, and components required in meeting the performance requirements of 10 CFR 73.55(b).</p>
Section II, SRP Acceptance Criteria	Page 13.6.2-17, Bullet No.2, Item H	NEI: Section H refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard</p>

		<p>Recommendation: Recommend removing Section H.</p>	<p>design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See preceding comment (i.e. response to general comment No.2).</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Page 13.6.2-19, Bullet No.3	<p>NEI: Section 3 refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing Section 3.</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Page 13.6.2-19, Bullet No.4	<p>NEI: Clarification should be provided that the access control measures being reviewed are those associated with the nuclear island.</p> <p>Recommendation: Revise text in the final sentence as follows, “The design descriptions should provide sufficient detail of how the following criteria for the nuclear island are met.”</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design</p>

			features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Page 13.6.2-19, Bullet No.4, Item C	<p>NEI: This section refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing this section.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Pages 13.6.2-19 to 13.6.2-20, Bullet No.5	<p>NEI: This section refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing this section.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical</p>

			<p>security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Pages 13.6.2-20, Bullet No.6	<p>NEI: Clarification should be provided that the detection and assessment systems being reviewed are those associated with the nuclear island.</p> <p>Recommendation: Revise text in the final sentence as follows, “The design descriptions should provide sufficient detail of how the following criteria for the nuclear island are met.”</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Pages 13.6.2-20, Bullet No.6	<p>NEI: Clarification should be provided that the detection and assessment systems being reviewed are those associated with the nuclear island.</p> <p>Recommendation: Revise text in the final sentence as follows, “The design descriptions should provide sufficient detail of how the following criteria for the nuclear island are met.”</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p>

Section II, Acceptance Criteria (SRP Acceptance Criteria)	Pages 13.6.2-20, Bullet No.7	<p>NEI: Clarification should be provided that the alarm station requirements being reviewed are those associated with the nuclear island.</p> <p>Recommendation: Revise text in the final sentence as follows, “The design descriptions should provide sufficient detail of how the following criteria for the nuclear island are met.”</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.” The SRP 13.6.2 guidance is applicable for review of alarm station.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Pages 13.6.2-20, Bullet No.7, Item A	<p>NEI: This section refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing this section.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (SRP Acceptance	Pages 13.6.2-21, Bullet No.8, Item A	<p>NEI: This section refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and</p>	<p>The staff disagrees with the comment and the recommendation.</p>

Criteria)		<p>therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing this section.</p>	<p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Pages 13.6.2-21, Bullet No.9	<p>NEI: This section refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing this section.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (SRP Acceptance	Pages 13.6.2-21 to 13.6.2-22, Bullet No.10	<p>NEI: This section refers to equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” and</p>	<p>The staff disagrees with the comment and the recommendation.</p>

Criteria)		<p>therefore should be eliminated from review under Section 13.6.2 of the SRP. Refer to general comment #2.</p> <p>Recommendation: Recommend removing this section.</p>	<p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict a DC applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>See response to general comment No.2.</p>
Section II, Acceptance Criteria (Technical Rationale)	Page 3.6.2-22, Bullet No.1	<p>NEI: Section 13.6.2 of the SRP should only review licensing regulations and approaches established in 10 CFR Part 52. Submittals in accordance with 10 CFR Part 50 should be reviewed under other sections of the SRP (e.g., 13.6.1). DCs would not be submitted under Part 50. Reference Standard Design Certification or Design Certification in 10 CFR 52.1, Definitions which states the DCs are clearly addressed under subpart B of 10 CFR 52.</p> <p>Recommendation: Recommend removing reference to 10 CFR Part 50.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., 10 CFR Parts 50 or 52). Therefore, reference to 10 CFR Part 50 is appropriately included to address applicability of staff guidance for all licensing reviews.</p> <p>(2) The commenter is correct that a DC is in accordance with provision of Subpart B of 10 CFR Part 52 and a DC is not submitted under the provision of 10 CFR Part 50. However, OL application submitted under 10 CFR Part 50 may reference a certified design (i.e., incorporate by reference) and thereby address the physical security system designs that are within the scope of the DC (final and not subject to further reviews under the OL application). The assumption that SRP Section 13.6.1 provides staff guidance only for the review of an OL is</p>

			incorrect. The staff guidance in both SPR Sections 13.6.1 and 13.6.2 are based on requirements of 10 CFR Part 73 for a nuclear reactor, regardless of the process chosen (10 CFR Parts 50 or 52) for licensing.
Section II, Acceptance Criteria (Technical Rationale)	Page 3.6.2-22, Bullet No.2	<p>NEI: Section 13.6.2 of the SRP should only review licensing regulations and approaches established in 10 CFR Part 52. Submittals in accordance with 10 CFR Part 50 should be reviewed under other sections of the SRP (e.g., 13.6.1). DCs would not be submitted under Part 50. Reference Standard Design Certification or Design Certification in 10 CFR 52.1, Definitions which states the DCs are clearly addressed under subpart B of 10 CFR 52.</p> <p>Recommendation: Recommend removing reference to 10 CFR Part 50 and RG 1.70.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., 10 CFR Parts 50 or 52). Therefore, reference to 10 CFR Part 50 is appropriately included to address applicability of staff guidance for all licensing reviews.</p> <p>(2) The commenter is correct that a DC is in accordance with provision of Subpart B of 10 CFR Part 52 and a DC is not submitted under the provision of 10 CFR Part 50. However, OL application submitted under 10 CFR Part 50 may reference a certified design (i.e., incorporate by reference) and thereby address the physical security system designs that are within the scope of the DC (final and not subject to further reviews under the OL application). The assumption that SRP Section 13.6.1 provides staff guidance only for the review of an OL is incorrect. The staff guidance in both SPR Sections 13.6.1 and 13.6.2 are based on requirements of 10 CFR Part 73 for a nuclear reactor, regardless of the process chosen (10 CFR Parts 50 or 52) for licensing.</p>
Section II, Acceptance Criteria (Technical Rationale)	Page 3.6.2-23, Bullet Nos.4 and 5	<p>NEI: The discussions in these sections are not related to review processes under Section 13.6.2 and should be relocated to 13.6.1.</p> <p>Recommendation: Recommend removing both sections and place in 13.6.1.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) The 10 CFR Part 73 requirements for the security of a nuclear power reactor are applicable for licensing under provisions of 10 CFR Part 50 and 10 CFR Part 52 (e.g.,</p>

			<p>OL, DC, and COL). An application for a COL or an OL may reference a certified design (i.e., incorporate by reference) or may be a standalone COL or OL that does not reference any certified design to address how physical security designs will meet the requirements of 10 CFR Part 73. SRP Section 13.6.2 provides staff guidance for licensing review of the design descriptions on how the requirements in 10 CFR Part 73, in either in a design certification and operating license application. .</p> <p>The staff agrees with the comment on the need for additional clarification on the applicability of staff guidance for operating license applications and Section I, "Area of Review," will be revised to add the following:</p> <p style="padding-left: 40px;">This SRP section provides staff guidance for the review of physical security system designs meeting the regulatory requirements in 10 CFR Part 73. Therefore the applicability of guidance in this SRP addressing the specific requirements in 10 CFR Part 73 are not limited only to the review of a design certification (DC) application under the provision of Subpart B to 10 CFR Part 52, but are also applicable in the review of a combined license (COL) or an operating license (OL) application, under the provisions of Subpart C of 10 CFR Part 52 or 10 CFR Part 50, respectively.</p> <p>(3) With respect to SRP Section 13.6.1, the staff planned revision will address interface with SRP Sections 13.6.2 that addresses the same requirements applicable to a COL or OL to minimize duplication of guidance for the review of physical security systems designs. Section I, Scope of the Technical Review for Physical Security, Item 6, adequately discuss this subject.</p>
Section II, Acceptance Criteria	Page 3.6.2-23, Bullet Nos.6 and 8	NEI: Section 7 under Technical Rationale is missing; jumps from 6 to 8.	The staff agrees with the comment and the recommendation. Revision to SRP 13.6.2 will correct the sequence of numbers.

(Technical Rationale)		Recommendation: Recommend renumbering.	
Section II, Acceptance Criteria (Technical Rationale)	Page 3.6.2-23, Bullet Nos.6 and 8	<p>NEI: The discussion in these sections regarding issuance of a COL does not add value to the Technical Rationale for a review of a DC under 13.6.2.</p> <p>Recommendation: Recommend removing discussions of COL in these sections.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) The 10 CFR Part 73 requirements for the security of a nuclear power reactor are applicable for licensing under provisions of 10 CFR Part 50 and 10 CFR Part 52 (e.g., OL, DC, and COL). An application for a COL or an OL may reference a certified design (i.e., incorporate by reference) or may be a standalone COL or OL that does not reference any certified design to address how physical security designs will meet the requirements of 10 CFR Part 73. SRP Section 13.6.2 provides staff guidance for licensing review of the design descriptions on how the requirements in 10 CFR Part 73, in either in a design certification and operating license application. .</p> <p>The staff agrees with the comment on the need for additional clarification on the applicability of staff guidance for operating license applications and Section I, “Area of Review,” is revised to add the following:</p> <p style="padding-left: 40px;">This SRP section provides staff guidance for the review of physical security system designs meeting the regulatory requirements in 10 CFR Part 73. Therefore the applicability of guidance in this SRP addressing the specific requirements in 10 CFR Part 73 are not limited only to the review of a design certification (DC) application under the provision of Subpart B to 10 CFR Part 52, but are also applicable in the review of a combined license (COL) or an operating license (OL) application, under the provisions of Subpart C of 10 CFR Part 52 or 10 CFR Part 50, respectively.</p>

			(3) With respect to SRP Section 13.6.1, the staff planned revision will address interface with SRP Sections 13.6.2 that addresses the same requirements applicable to a COL or OL to minimize duplication of guidance for the review of physical security systems designs. Section I, Scope of the Technical Review for Physical Security, Item 6, adequately discuss this subject.
Section II, Acceptance Criteria (Technical Rationale)	Page 3.6.2-27, Bullet No.8	<p>NEI: Section 13.6.2 of the SRP should only review licensing regulations and approaches established in 10 CFR Part 52. Submittals under 10 CFR Part 50 should be reviewed under other sections of the SRP. DCs would not be submitted under Part 50. Reference Standard Design Certification or Design Certification in 10 CFR 52.1, Definitions.</p> <p>Recommendation: Recommend removing reference to 10 CFR Part 50.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., 10 CFR Parts 50 or 52). Therefore, reference to 10 CFR Part 50 is appropriately included to address applicability of staff guidance for all licensing reviews.</p> <p>(2) The commenter is correct that a DC is in accordance with provision of Subpart B of 10 CFR Part 52 and a DC is not submitted under the provision of 10 CFR Part 50. However, OL application submitted under 10 CFR Part 50 may reference a certified design (i.e., incorporate by reference) and thereby address the physical security system designs that are within the scope of the DC (final and not subject to further reviews under the OL application). The assumption that SRP Section 13.6.1 provides staff guidance only for the review of an OL is incorrect. The staff guidance in both SPR Sections 13.6.1 and 13.6.2 are based on requirements of 10 CFR Part 73 for a nuclear reactor, regardless of the process chosen (10 CFR Parts 50 or 52) for licensing.</p>
Section III, Review Procedures	Pages 3.6.2-25 through 3.6.2-29, Bullet Nos.1-15	<p>NEI: These sections state that reviewers evaluate the proposed designs for how they conform to specific regulations, RGs, NUREGs and other referenced documents. There are other</p>	<p>The staff agrees with the comment that there other acceptable approaches to meeting regulatory requirements. However, the staff disagrees with the recommendation.</p>

		<p>acceptable approaches to meeting regulatory requirements.</p> <p>Recommendation: Suggest revised wording in all these sections to add the ability for an applicant to propose alternate approaches that meet regulatory requirements.</p>	<p>Basis: The footnote to this SRP and others includes the following:</p> <p>“This Standard Review Plan (SRP), NUREG-0800, has been prepared to establish criteria that the U.S. Nuclear Regulatory Commission (NRC) staff responsible for the review of applications to construct and operate nuclear power plants intends to use in evaluating whether an applicant/licensee meets the NRC’s regulations. The Standard Review Plan is not a substitute for the NRC’s regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations.”</p> <p>In addition, alternative approaches to regulatory requirements are submitted under the provisions of 10 CFR 75.55(r), “Alternative Measures.” The provisions of 10 CFR 73.5, “Specific Exemptions,” provides for the considerations of exemptions to regulatory requirements in 10 CFR Part 73.</p>
<p>Section III, Review Procedures</p>	<p>Pages 3.6.2-25 through 3.6.2-29, Bullet Nos.1-15</p>	<p>NEI: Several sections describe reviews for equipment or systems that are not related to the nuclear island and structures described in the “Scope of the Technical Review for Physical Security” (e.g., PA barriers, PA IDS, PA access control systems, etc.) and therefore should be eliminated from review under Section 13.6.2 of the SRP.</p> <p>Recommendation: Recommend removing the text referring to any systems review for those components outside of the nuclear island.</p>	<p>The staff disagrees with the comment and recommendation:</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict an applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item</p>

			<p>4 explains this by stating that “the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant.”</p> <p>(2) The 10 CFR Part 73 requirements for the security of a nuclear power reactor are applicable for licensing under provisions of 10 CFR Part 50 and 10 CFR Part 52 (e.g., OL, DC, and COL). An application for a COL or an OL may reference a certified design (i.e., incorporate by reference) or may be a standalone COL or OL that does not reference any certified design to address how physical security designs will meet the requirements of 10 CFR Part 73. SRP Section 13.6.2 provides staff guidance for licensing review of the design descriptions on how the requirements in 10 CFR Part 73, in either in a design certification and operating license application. .</p> <p>The staff agrees with a previous comment on the need for additional clarification on the applicability of staff guidance for operating license applications and Section I, “Area of Review,” will be revised to add the following:</p> <p style="padding-left: 40px;">This SRP section provides staff guidance for the review of physical security system designs meeting the regulatory requirements in 10 CFR Part 73. Therefore the applicability of guidance in this SRP addressing the specific requirements in 10 CFR Part 73 are not limited only to the review of a design certification (DC) application under the provision of Subpart B to 10 CFR Part 52, but are also applicable in the review of a combined license (COL) or an operating license (OL) application, under the provisions of Subpart C of 10 CFR Part 52 or 10 CFR Part 50, respectively.</p> <p>(3) With respect to SRP Section 13.6.1, the staff planned revision will address interface with SRP Sections 13.6.2 that addresses the same requirements applicable to a COL or OL to minimize duplication of guidance for the</p>
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			review of physical security systems designs. Section I, Scope of the Technical Review for Physical Security, Item 6, adequately discuss this subject.
Section III, Review Procedures	Page 3.6.2-26, Bullet No.6	<p>NEI: Editorial; double comma after "...defense-in-depth".</p> <p>Recommendation: Recommend deleting comma.</p>	The staff agrees with the comment and the recommendation. Revision to SRP 13.6.2 will delete the extra comma.
Section III, Review Procedures (Review of interfaces between a certified design and a COL application for physical security includes the following)	Pages 13.6.2-29 – 13.6.2-30, second paragraph	<p>NEI: The discussion in this section provides guidance for reviews for a COL and should be moved to Section 13.6.1. Refer to general comment #1.</p> <p>Recommendation: Recommend moving this guidance to 13.6.1.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Subpart B of 10 CFR Part 52 does not restrict an applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC. Section I, Scope of the Technical Review for Physical Security, Item 4, explains this by stating that "the design of physical security systems within the scope of the standard design may include plant areas beyond the nuclear island and structures, as determined by the applicant."</p> <p>(2) The 10 CFR Part 73 requirements for the security of a nuclear power reactor are applicable for licensing under provisions of 10 CFR Part 50 and 10 CFR Part 52 (e.g., OL, DC, and COL). An application for a COL or an OL may reference a certified design (i.e., incorporate by reference) or may be a standalone COL or OL that does not reference any certified design to address how physical security designs will meet the requirements of 10 CFR Part 73. SRP Section 13.6.2 provides staff guidance for licensing review of the design descriptions on how the requirements in 10 CFR Part 73, in either in a design certification and operating license application. .</p>

			<p>The staff agrees with previous comment on the need for additional clarification on the applicability of staff guidance for operating license applications and Section I, "Area of Review," will be revised to add the following:</p> <p style="padding-left: 40px;">This SRP section provides staff guidance for the review of physical security system designs meeting the regulatory requirements in 10 CFR Part 73. Therefore the applicability of guidance in this SRP addressing the specific requirements in 10 CFR Part 73 are not limited only to the review of a design certification (DC) application under the provision of Subpart B to 10 CFR Part 52, but are also applicable in the review of a combined license (COL) or an operating license (OL) application, under the provisions of Subpart C of 10 CFR Part 52 or 10 CFR Part 50, respectively.</p> <p>(3) With respect to SRP Section 13.6.1, the staff planned revision will address interface with SRP Sections 13.6.2 that addresses the same requirements applicable to a COL or OL to minimize duplication of guidance for the review of physical security systems designs. Section I, Scope of the Technical Review for Physical Security, Item 6, adequately discuss this subject.</p>
<p>Section III, Review Procedures (Review of interfaces between a certified design and a COL application for physical security includes the following)</p>	<p>Pages 13.6.2-29 – 13.6.2-30, third paragraph</p>	<p>NEI: Section 13.6.2 of the SRP should only review licensing regulations and approaches established in 10 CFR Part 52. Submittals in accordance with 10 CFR Part 50 should be reviewed under other sections of the SRP (e.g., 13.6.1). DCs would not be submitted under Part 50. Reference Standard Design Certification or Design Certification in 10 CFR 52.1, Definitions which states the DCs are clearly addressed under subpart B of 10 CFR 52.</p> <p>Recommendation: Recommend removing this paragraph.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., 10 CFR Parts 50 or 52). Therefore, reference to 10 CFR Part 50 is appropriately included to address applicability of staff guidance for all licensing reviews.</p> <p>(2) The commenter is correct that a DC is in accordance</p>

			<p>with provision of Subpart B of 10 CFR Part 52 and a DC is not submitted under the provision of 10 CFR Part 50. However, OL application submitted under 10 CFR Part 50 may reference a certified design (i.e., incorporate by reference) and thereby address the physical security system designs that are within the scope of the DC (final and not subject to further reviews under the OL application). The assumption that SRP Section 13.6.1 provides staff guidance only for the review of an OL is incorrect. The staff guidance in both SPR Sections 13.6.1 and 13.6.2 are based on requirements of 10 CFR Part 73 for a nuclear reactor, regardless of the process chosen (10 CFR Parts 50 or 52) for licensing.</p>
<p>Section V, Implementation</p>	<p>Pages 13.6.2-30 – 13.6.2-31</p>	<p>NEI: This section describes use of the SRP for review of systems and processes other than the DC. There are already processes in place for such reviews and all text after the first sentence should be removed. Refer to general comment #4.</p> <p>Recommendation: Remove all text in this section after the first sentence.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) The performance and prescriptive requirements of 10 CFR Part 73 are applicable to a nuclear power reactor licensed under provisions of 10 CFR Parts 50 and 52. Also, the guidance is not limited to new reactor application, not yet licensed. The recommendation to remove reference to 10 CFR Part 50 or operating reactor is not appropriate because the staff guidance address the requirements of 10 CFR Part 73, which applies to application and licensed facilities under either licensing processes of 10 CFR Parts 50 or 52</p> <p>(2) Regards to licensing change control processes establish by provisions of 10 CFR 50.54(p)(2) and 10 CFR 50.90 are processes for changes to licensing basis (i.e., security plans) with or without prior NRC approval. NRC and industry guidance for regulatory processes are not substitute or replaces the staff guidance in this SRP section.</p>

Description of Changes	Page 13.6.2-36, Last Paragraph	<p>NEI: "Evolutional" should be "Evolutionary". "Pressurize" should be "Pressurized".</p> <p>Recommendation: See comment.</p>	<p>The staff agrees with the comment and the recommendation. The SRP Section 13.6.2 will be revised to indicate "Evolutionary Pressurized Reactor."</p>
Appendix A	Pages 13.6.2-26 to 13.6.2-39, Appendix A	<p>NEI: See comment for Page 9, Sections 5 & 6.</p> <p>Recommendation: Recommend removing Appendix A.</p>	<p>The staff disagrees with the general comment and the recommendation.</p> <p>Basis:</p> <p>(1) The SRP 13.6.2 guidance addresses all design requirements in 10 CFR Part 73 that are applicable to a nuclear power reactor, regardless of whether they are being addressed in an application for a certified design or in an application for an operating license (COL or OL). Therefore interface between SRP Section 13.6.1, Appendix A to comprehensive all requirements and is necessary to minimize duplication of guidance for the review of physical security systems designs meeting design requirements in 10 CFR Part 73. The revision to SRP Section 13.6.1 will address the interface required.</p>
Section I, Area of Review	Page 13.6.2-2, third paragraph	<p>B&W: (1) The review should be limited to the designs within the scope of the DC application. Also, review focus should be on design to support security responses, not on the response functions themselves.</p> <p>(2) It should be noted that the requirement is that sufficient design information normally contained in procurement, construction and installation specifications be available for audit. The regulation does not say that the procurement, construction and installation specifications themselves must be prepared and available for audit, just the information normally contained in them.</p> <p>Recommendation: Suggest reword..."The staff also reviews the designs of structures, system,</p>	<p>The staff agrees with the comment item (1), but disagrees with the comment item (2) and the recommendation.</p> <p>Basis:</p> <p>(1) This SRP 13.6.2 provide staff guidance on review of physical system designs meeting requirements in 10 CFR Part 73, regardless of whether they are being addressed in an application for a DC, COL or an OL (i.e., 10 CFR Parts 50 or 52). Also, Subpart B of 10 CFR Part 52 does not restrict an applicant from including physical security design features beyond the nuclear island and structures as a standard design. A design certification may include security design features in the protected and owner controlled areas if established as within the scope of the DC.</p> <p>(2) Regarding comment (2), the requirements of 10 CFR</p>

		<p>components, and features within the scope of the design certification application..."</p> <p>Other sections throughout the SRP discuss staff review of design and specifications... because the availability of the specifications is not required suggest that either "specification" be deleted or use the terminology from the regulation itself "the information normally contained in... specifications..."</p>	<p>54.47, "Contents of applications; technical information," states the following:</p> <p>The application must contain a level of design information sufficient to enable the Commission to judge the applicant's proposed means of assuring that construction conforms to the design and to reach a final conclusion on all safety questions associated with the design before the certification is granted. The information submitted for a design certification must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement <u>specifications</u> and construction and installation <u>specifications</u> by an applicant. The Commission will require, before design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to make its safety determination.</p> <p>(3) The information must be sufficiently detailed, submitted on the docket, for the Commission to grant a certification. The details supporting the design must be sufficiently complete and available for licensing audit. The information available for audit completed and available information for audit is not a substitute for sufficiently detailed information on the docket (i.e., a design certification application) required for the basis of regulatory findings.</p> <p>(4) The statement, "the staff's review is limited to the design of physical security systems within the nuclear power plant, and structures and plant areas included in the scope of a DC," within the paragraph already address the suggestion to reword text. Because specifications is stated in the regulation and are descriptions for details of</p>
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			system designs, the use of specifications here and throughout the document do not need to be revised as suggested.
Section I, Areas of Review (Scope of Technical Review for Physical Security)	Page 13.6.3.2-4, last paragraph before table	<p>B&W: Design features that are clearly within the scope of the COL application do not need the DC applicant to point this out as a COL information item. That is not the purpose of COL information items (see RG 1.206, C.111.4). A COL information item included in a DC application that identifies that the COL applicant must provide specific design information to meet regulatory requirements specifically applicable to a COL applicant is duplicative. The COL applicant must comply with the regulations in Subpart C of 10 CFR 52 that are applicable to its scope regardless of whether the DC applicant identifies it as COL information item or not.</p> <p>Recommendation: Suggest that the NRC reword this paragraph to clearly identify that the COL applicant is required to address the regulations pertaining to its scope of design and discuss that the DC applicant may voluntarily identify certain design aspects that a COL should provide design information for but do not make it a COL action item.</p>	<p>The staff agrees with the comment and recommendation. The SRP Section 13.6.2 will be revised to include the following:</p> <p style="padding-left: 40px;">Each matter subject to one of the above criteria should be described in a COL information item, but is not necessary if regulations explicitly require submission of information or performance of actions being considered for a COL information item. A COL applicant is required to address the regulations regardless of whether a COL information item is identified in a certified design. As such, a DC applicant may voluntarily identify design certain aspects that a COL should provide in design information, but not necessary establish a COL information item.</p> <p>The change is in addition, the discussion of COL Information Items on Page 13.6.2-8 which states that “a COL information item may not be necessary if regulations explicitly require submission of information or performance of actions being considered for a COL information item (e.g., submission of security plans describing how 10 CFR Part 73 requirements will be met).”</p>
Section I, Areas of Review (Scope of the Technical Review for Physical Security)	Page 13.6.2-7, Item No.4.	<p>B&W: See comment 2 on the need for a DC applicant to identify as COL information items those design information needs that are already requirements for a COL applicant in 10 CFR 52.79.</p> <p>Recommendation: Suggest NRC delete statement that says a DC applicant should include a COL information item for design information that is outside the scope of the DC application.</p>	The staff agrees with the comment, but disagrees with the recommendation. The subject is already addressed in the SRP and additional clarification will be incorporated based on response to a preceding recommendation.
Section I, Areas of Review	Page 13.6.2-8.	B&W: The NRC indicates that "test abstracts" should be included for ITAAC. The NRC also	The staff disagrees with the comment and recommendation.

<p>(Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC))</p>		<p>refers to "ITAAC verification program (i.e., "management systems)" in as follows: "The review of PS-ITAAC is this discussion. "Test abstracts" are not necessary for ITAAC and have not been included in previous DC applications. "Test abstracts" are typically associated determine that appropriate security with the Initial Test Program discussion under SRP design features are included in the 14.2 and RG 1.68.</p> <p>ITAAC by their nature are verification requirements. A COL applicant that references a DC must incorporate all the ITAAC from that DC. It is the COL holder's responsibility to implement and closeout the ITAAC. The DC applicant is not required to establish an ITAAC implementation program or management system.</p> <p>Recommendation: Suggest that the NRC revise the entire paragraph following the first sentence as follows: "The review of PS-ITAAC is performed in accordance with guidance provided in NUREG-0800...to determine that appropriate security design features are included and the scope of PS-ITAAC and that PS-ITAAC are implementable. This review is performed in accordance with SRP 14.3.12.</p>	<p>Basis:</p> <p>(1) 10 CFR 52.47(b)(1) states that "the application must also contain: (1) The proposed inspections, tests, analyses, and acceptance criteria that are necessary and sufficient to provide <u>reasonable assurance</u> that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a facility that incorporates the design certification has been constructed and will be operated in conformity with the design certification, the provisions of the Act, and the Commission's rules and regulations."</p> <p>(2) The adequate descriptions of how physical security ITAAC will be verified provide the basis for reasonable assurance that "if the inspections, tests, and analyses, are performed" to demonstrate that acceptance criteria will be met. The descriptions of ITACC or test abstracts, which consist of descriptions of the test objectives, prerequisites, test methods, required data, and acceptance criteria that establish how verification will be performed and the information is provided under Chapter 14, Verification Program, of the FSAR. The listing of what are physical security ITAAC alone do not provide the basis for reasonable assurance that required inspections, tests, and/or analyses will be performed to verify that the ITAAC design commitments and criteria for acceptance will be met.</p> <p>(3) Contrary to the assumption stated in the comment, ITAAC or Test abstracts, along with management system (program and processes – requirement identification, construction verification, compliance determination, records, procedures, etc. for ITAAC verification) are provided in Chapter 14 of the FSAR (Tier 2). For example, the US-EPR and US-APWR DC applications both provide descriptions on ITAAC abstracts, to address reasonable assurance. The descriptions of abstracts provided the framework for the development of the detail</p>
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			test procedures for the conducting the ITA and the acceptance criteria, if met, will demonstrate that the plant incorporated the standard design and the identified PSS will operate in accordance with the design performances and requirements of the certified design.
Section I, Areas of Review (COL Information Items, Certification Requirements, and Restrictions)	Page 13.6.2-8, last sentence in first paragraph	<p>The statement ..."A COL information item may not be necessary if regulations explicitly require submission of information or performance of actions being considered..." requires clarification. This comment is comments 2 and 3 above. This philosophy should be consistent throughout the SRP.</p> <p>Recommendation: Recommend revising the referenced sentence as follows: "A COL information item may not be necessary if regulations explicitly require submission by the COL applicant or performance of actions (i.e., security responses) being considered by the COL applicant."</p>	The staff agrees with the comment, but disagrees with the recommendation. The subject is already addressed in the SRP and additional clarification will be incorporated based on response to a preceding recommendation.
Section I, Areas of Review (COL Information Items, Certification Requirements, and Restrictions)	Page. 13.6.2-8, first sentence in second paragraph under COL Information Items.	<p>B&W: This sentence requires clarification. The statement suggests NRC is allowing use of DAC (design acceptance criteria) for security design features. It should be clear that design information within scope of the COL application must be provided by the COL applicant in accordance with regulatory requirements not because there is a COL information item (see Comments 2 and 3).</p> <p>Recommendation: NRC should clarify discussion on use of DAC for security design features. Clarify what is intended. Perhaps some terminology other than "defer" is more appropriate.</p>	<p>The staff agrees with the comment and recommendation. The use of DAC is not applicable to physical security system designs and is not used. The revision to SRP Section 13.6.2 will delete the use of "defer" and indicate the following:</p> <p>“Should a DC applicant propose that a COL applicant address the specific design descriptions for an item identified in Table 13.6.2.1 that is within the nuclear island and structures, with reasonable justification, a COL information item should be established to identify and ensure that the specific design descriptions meeting the prescriptive requirements are addressed by a COL applicant that references the certified design.”</p>

<p>Section II, Acceptance Criteria (Requirements)</p>	<p>Page 13.6.2-11, Bullet No.3</p>	<p>B&W: Acceptance Criteria Item 3 identifies a requirement for "high assurance." Even though the SRP is guidance only, it is unclear how the NRC can make a "high assurance" finding for this particular design area when only a "reasonable assurance" finding is necessary to issue a Design Certification and a Combined License.</p> <p>Recommendation: Suggest that NRC revisit the applicability of a "high assurance" finding for a DC applicant and a COL applicant. Also suggest that the NRC revisit the timing for the requirement of "high assurance" to be upon successful implementation of operational security programs by the COL holder and upon successful completion of force-on-force exercise.</p>	<p>The staff disagrees with the comment and suggestion.</p> <p>Basis:</p> <p>(1) The high assurance is a criteria of the performance requirement of 10 CFR 73.55(b)(1) for protecting against the DBT. The design of a physical protection is required to achieve this high assurance, which means that engineered physical security systems for detection, assessments, communications, delays, and systems relied-on for response functions are integrated with administrative controls (people and procedures) to achieve a high assurance of adequate protection. Therefore the performance requirement of high assurance of 10 CFR 73.55(b) relevant to how engineered physical security systems are designed (e.g., redundancies, separations, independence) to meet the performance requirement of high assurance.</p> <p>(2) The commenter is correct that the finding for a DC is regarding the design of physical security systems and the compliance of 10 CFR 73.55(b) requirement for high assurance of adequate protection is address by the COL applicant that seeking a COL (see Section IV of this SRP).</p> <p>(3) 10 CFR 73.55(b)(6) and Appendix B to 10 CFR Part 73 requires that a licensees to demonstrate and assess annually the physical protection system designed to be capable of meeting the requirements of 10 CFR 73.55(b). The force-of-force is an exercise that a part of the evaluation program, not requirements the replace the requirement for how a design of a physical protection that meet the requirement of 10 CFR 73.55(b) in licensing of COL or OL.</p>
<p>Section II, Acceptance Criteria (SRP)</p>	<p>Pages 13.6.2-13 – 13.6.2-14, first sentence in second</p>	<p>B&W: There is no requirement for developing "detailed" procurement, construction, and installation specifications or specifications at all.</p>	<p>The staff disagrees with the comment item and the recommendation.</p>

<p>Acceptance Criteria)</p>	<p>full paragraph. "The design descriptions must be of sufficient detail to permit the development of detailed procurement, construction, and installation specifications by an applicant, in accordance with 10 CFR 52.48."</p>	<p>The requirement is that information normally procurement, construction and installation specifications be made available for audit. Reference to 10 CFR 52.48 is incorrect.</p> <p>Recommendation: Suggest deleting "detailed" description of specifications and use language from regulations to achieve clarity Appropriate reference is 10 CFR 52.47</p>	<p>Basis:</p> <p>(1) Regarding comment (2), the requirements of 10 CFR 54.47, "Contents of applications; technical information," states the following:</p> <p style="padding-left: 40px;">The application must contain a level of design information sufficient to enable the Commission to judge the applicant's proposed means of assuring that construction conforms to the design and to reach a final conclusion on all safety questions associated with the design before the certification is granted. The information submitted for a design certification must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement <u>specifications</u> and construction and installation <u>specifications</u> by an applicant. The Commission will require, before design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to make its safety determination.</p> <p>(2) The information must be sufficiently detailed, submitted on the docket, for the Commission to grant a certification and the detail must be completed and available for licensing audit. The information available for audit completed and available information for audit is not a substitute for sufficiently detailed information on the docket (i.e., a design certification application).</p> <p>(3) The statement, "the staff's review is limited to the design of physical security systems within the nuclear power plant, and structures and plant areas included in the scope of a DC," within the paragraph already address the suggestion to reword text. Because specifications is</p>
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			stated in the regulation and are descriptions for details of system designs, the use of specifications here and throughout the document do not need to be revised as suggested.
Section II, Acceptance Criteria (SRP Acceptance Criteria)	Page 13.6.2-14, Bullet No.1, third full paragraph, second sentence. "The information submitted must be sufficient for completing detailed design for procurement, construction, and installation of physical security systems..."	<p>B&W: The language in this paragraph is not entirely consistency with regulatory language in 10 CFR 52.47. For example, "detailed design" is not used and there is no requirement to actually produce or submit these specifications for a DC application.</p> <p>Revise for consistency with regulatory language in 10 CFR 52.47.</p>	<p>The staff disagrees with the comment and the recommendation.</p> <p>Basis:</p> <p>(1) Regarding comment, the requirements of 10 CFR 54.47, "Contents of applications; technical information," states the following:</p> <p style="padding-left: 40px;">The application must contain a level of design information sufficient to enable the Commission to judge the applicant's proposed means of assuring that construction conforms to the design and to reach a final conclusion on all safety questions associated with the design before the certification is granted. The information submitted for a design certification must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement <u>specifications</u> and construction and installation <u>specifications</u> by an applicant. The Commission will require, before design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to make its safety determination.</p> <p>(2) The information must be sufficiently detailed, submitted on the docket, for the Commission to grant a certification and the detail must be completed and available for licensing audit. The information available for audit completed and available information for audit is not a substitute for sufficiently detailed information on the</p>

			<p>docket (i.e., a design certification application).</p> <p>(3) The statement, "the staff's review is limited to the design of physical security systems within the nuclear power plant, and structures and plant areas included in the scope of a DC," within the paragraph already address the suggestion to reword text. Because specifications is stated in the regulation and are descriptions for details of system designs, the use of specifications here and throughout the document do not need to be revised as suggested.</p>
<p>Section II, Acceptance Criteria (SRP Acceptance Criteria)</p>	<p>Page 13.6.2-14 and throughout the " Acceptance Criteria Section the NRC states "the descriptions of designs and specifications..."</p>	<p>B&W: DC applicants are not required to submit specifications or describe specifications.</p> <p>Delete "and specifications" throughout.</p>	<p>The staff disagrees with the comment and recommendation.</p> <p>Basis:</p> <p>(1) Regarding comment (2), the requirements of 10 CFR 54.47, "Contents of applications; technical information," states the following:</p> <p>.</p> <p>The application must contain a level of design information sufficient to enable the Commission to judge the applicant's proposed means of assuring that construction conforms to the design and to reach a final conclusion on all safety questions associated with the design before the certification is granted. The information submitted for a design certification must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement <u>specifications</u> and construction and installation <u>specifications</u> by an applicant. The Commission will require, before design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to</p>

			<p>make its safety determination.</p> <p>(2) The information must be sufficiently detailed, submitted on the docket, for the Commission to grant a certification and the detail must be completed and available for licensing audit. The information available for audit completed and available information for audit is not a substitute for sufficiently detailed information on the docket (i.e., a design certification application).</p> <p>(3) The statement, "the staff's review is limited to the design of physical security systems within the nuclear power plant, and structures and plant areas included in the scope of a DC," within the paragraph already address the suggestion to reword text. Because specifications is stated in the regulation and are descriptions for details of system designs, the use of specifications here and throughout the document do not need to be revised as suggested.</p>
<p>Section II, Acceptance Criteria (SRP Acceptance Criteria)</p>	<p>Page 13.6-2-16, Bullet No.1, Item F</p>	<p>B&W: Same comment on "high assurance" as in comment 7.</p> <p>See suggestion for comment 7. Item F</p>	<p>The staff disagrees with the comment item and the recommendation.</p> <p>Basis:</p> <p>(1) Regarding comment (2), the requirements of 10 CFR 54.47, "Contents of applications; technical information," states the following:</p> <p>The application must contain a level of design information sufficient to enable the Commission to judge the applicant's proposed means of assuring that construction conforms to the design and to reach a final conclusion on all safety questions associated with the design before the certification is granted. The information submitted for a design certification must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement <u>specifications</u> and construction and</p>

			<p>installation <u>specifications</u> by an applicant. The Commission will require, before design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to make its safety determination.</p> <p>(2) The information must be sufficiently detailed, submitted on the docket, for the Commission to grant a certification and the detail must be completed and available for licensing audit. The information available for audit completed and available information for audit is not a substitute for sufficiently detailed information on the docket (i.e., a design certification application).</p> <p>(3) The statement, "the staff's review is limited to the design of physical security systems within the nuclear power plant, and structures and plant areas included in the scope of a DC," within the paragraph already address the suggestion to reword text. Because specifications is stated in the regulation and are descriptions for details of system designs, the use of specifications here and throughout the document do not need to be revised as suggested.</p>
<p>Section II, Acceptance Criteria (Technical Rationale)</p>	<p>Technical Rationale, Page 13.6.2-22, Bullet No.1</p>	<p>B&W: It is unclear how findings in the area of security design can be "independent of the licensing regulations and licensing approaches established in 10 CFR 52..." particularly when Part 52 invokes Part 73. Inherent in this technical rationale is the allowance for a different finding in the area of security than for the rest of the review for either a DC application or a COL application.</p> <p>Recommendation: Revise Item 1 to ensure there is consistency in regulatory findings. See suggestion for Comment 7 also.</p>	<p>The staff disagrees with the comment and recommendation.</p> <p>Basis:</p> <p>The statement,</p> <p>"Independent of the licensing regulations and licensing approaches established in 10 CFR Part 52 (or 10 CFR Part 50), the physical protection for a nuclear power plant must meet the requirements of 10 CFR Part 73."</p>

			<p>refers to the regulations and processes for licensing. Under approaches for licensing (DC and COL), the physical protection of a nuclear power reactor must meet the requirements in 10 CFR Part 73.</p> <p>The SRP will be revised to indicate “process” in lieu of “approaches,” for clarity.</p>
Section II, Acceptance Criteria (Technical Rationale)	Page 13.6.2-22, Bullet No.5	<p>B&W: There are requirements to include ITAAC in a DC and COL application so including an exception here for ITAAC is inaccurate.</p> <p>Recommendation: Delete exception for ITAAC.</p>	<p>The staff agrees with the comments and recommendation. The exception for ITAAC requirements is accurate for the licensing requirements under provisions of 10 CFR Part 50. The SRP will be revised to delete “With the exception of requirements for ITAAC.”</p>
Section III, Review Procedures	Page 13.6.2-24, Bullet No.1	<p>B&W: Same as comment 7 on high assurance</p> <p>Recommendation: See suggestion for Comment 7.</p>	<p>The staff disagrees with the comment and suggestion. See previous response.</p> <p>Basis:</p> <p>(1) The high assurance is a criteria of the performance requirement of 10 CFR 73.55(b)(1) for protecting against the DBT. The design of a physical protection is required to achieve this high assurance, which means that engineered physical security systems for detection, assessments, communications, delays, and relied-on for response functions are integrated with administrative controls (people and procedures) to achieve a high assurance of adequate protection. Therefore the performance requirement of high assurance of 10 CFR 73.55(b) relevant to how engineered physical security systems are designed (e.g., redundancies, separations, independence) to meet the performance requirement of high assurance.</p> <p>(2) The commenter is correct that the finding for a DC is regarding the design of physical security systems and the compliance of 10 CFR 73.55(b) requirement for high assurance of adequate protection is address by the COL applicant that seeking a COL (see Section IV of this SRP).</p>

			<p>(3) 10 CFR 73.55(b)(6) and Appendix B to 10 CFR Part 73 requires that a licensee to demonstrate and assess annually the physical protection system designed to be capable of meeting the requirements of 10 CFR 73.55(b). The force-of-force is an exercise that a part of the evaluation program, not requirements that replace the requirement for how a design of a physical protection that meet the requirement of 10 CFR 73.55(b) in licensing of COL or OL.</p>
<p>Section III, Review Procedures</p>	<p>Pages 13.6.2-25 to 13.6.2-29, Bullet Nos.6, 7, 8 and throughout</p>	<p>B&W: These items refer to review of the design and specifications...there is no requirement to develop specification for review. Wording the acceptance criteria in this fashion places an expectation for the review documentation that is not supported by the regulations. See comment 1 and other similar comments.</p> <p>Recommendation: Delete reference to review of specifications or revise to review of information normally contained in specifications.</p>	<p>The staff disagrees with the comment item and the recommendation.</p> <p>Basis:</p> <p>(1) Regarding comment (2), the requirements of 10 CFR 54.47, "Contents of applications; technical information," states the following:</p> <p>.</p> <p>The application must contain a level of design information sufficient to enable the Commission to judge the applicant's proposed means of assuring that construction conforms to the design and to reach a final conclusion on all safety questions associated with the design before the certification is granted. The information submitted for a design certification must include performance requirements and design information sufficiently detailed to permit the preparation of acceptance and inspection requirements by the NRC, and procurement <u>specifications</u> and construction and installation <u>specifications</u> by an applicant. The Commission will require, before design certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if the information is necessary for the Commission to make its safety determination.</p>

			<p>(2) The information must be sufficiently detailed, submitted on the docket, for the Commission to grant a certification and the detail must be completed and available for licensing audit. The information available for audit completed and available information for audit is not a substitute for sufficiently detailed information on the docket (i.e., a design certification application).</p> <p>(3) The statement, “the staff’s review is limited to the design of physical security systems within the nuclear power plant, and structures and plant areas included in the scope of a DC,” within the paragraph already address the suggestion to reword text. Because specifications is stated in the regulation and are descriptions for details of system designs, the use of specifications here and throughout the document do not need to be revised as suggested.</p>
Section III, Review Procedures	Page 13.6.2 26, Bullet No.9	<p>B&W: Portions of this item are not applicable to a DC applicant (e.g., communications by local law enforcement agencies).</p> <p>Recommendation: Delete those portions as not applicable to a DC applicant.</p>	<p>The staff disagrees with the comment and recommendation, but editorial change is made for clarification regarding communications with local law enforcement agencies. The SRP will be revised as follows:</p> <p style="padding-left: 40px;">"Review the designs and specifications for how security communications will be provided on the plant site <i>and for communications</i> with local law enforcement agencies to satisfy the regulatory requirements and conform to SRP acceptance criteria in Section II. . ."</p>
Section IV, Evaluation Findings	Page 13.6.2-29, second paragraph	<p>B&W: The evaluation finding has a mix of findings with both a DC applicant and a COL applicant.</p> <p>Recommendation: Revise finding to address only those applicable to a DC applicant.</p>	<p>The staff disagrees with the comment and recommendation. The evaluation findings provide an example for the evaluation findings for a design certification. The example may be modified as appropriately and applied to document the finding for physical protection system designs review in an OL or COL application.</p>

<p>Section I, Areas of Review</p>	<p>General Comment</p>	<p>B&W: DC applicants may develop a Physical Security Plan template that can be reviewed/endorsed by the NRC for COL applicants referencing its design. Existing guidance documents (e.g., NUREG-0800) do not clearly identify staff's capability to perform this type of review for a DC applicant. Recommend including that provision in this revision of Section 13.6.2.</p> <p>Recommendation: Recommend following wording be added into Section I. Areas of Review. Although there is no regulatory requirement for a design certification (DC) applicant to provide a Security Plan, a DC applicant may submit a Security Plan template for their design that can be used by a COL applicant referencing their DC to develop a Security Plan. The NRC staff will also review the Security Plan template that is provided by DC applicants using the review guidance contained in NUREG-0800, Section 13.6. 1.</p>	<p>The staff agrees with the comment and but disagree with recommendation.</p> <p>Basis: The activity described is a pre-application activity with a specific applicant or generic activity with industry for determining acceptance of templates for submission of information (format and content) in security plans meeting regulatory requirements. The activity to develop template is not a licensing review and no regulatory findings are provided. The guidance in NUREG 0800 SRP sections for the staff licensing reviews and is not intended to address activities outside of licensing reviews.</p> <p>Because the SRP Sections provides insights to guidance that will be applied in staff's reviews, the development of template that address the content of licensing submittals may apply the information in the SRP to ensure submittals address all applicable requirements in the appropriate format and content for completeness for efficiency in licensing reviews.</p> <p>This SRP Section 13.6.2 address guidance for review of physical security system designs and provides insights for preparing submittal capturing design descriptions in a licensing application or developing a template that capture such information required for licensing and regulatory findings. Because this SRP Section 13.6.2 addresses the review of requirements for physical security system designs, it will only provide insights on a portion of information required in security plans, which will include additional information on administrative controls, management systems (programs, processes), and organization that will be integrated with engineering controls to meet regulatory requirements</p>
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