

***ENHANCED SECURITY AT FUEL CYCLE FACILITY
SPECIAL NUCLEAR MATERIAL TRANSPORTATION SECURITY
SECURITY-FORCE FATIGUE AT NUCLEAR FACILITIES***

**10 CFR Parts 26 and 73 Draft Basis Document:
Cost/Impact Considerations**

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Applicability of Proposed Changes

- Fixed-Site Physical Protection
 - Applicable to fuel cycle, non-power reactors and applicants
- Transportation Physical Protection
 - Applicable to fuel cycle, non-power reactors and applicants
- Safety/Safeguards Interface
 - Applicable to fuel cycle, non-power reactors and applicants, however not applicable to Part 70 licensees not subject to 10 CFR 70.72
- Fitness –for Duty
 - Applicable to security officers at Category I facilities

Potentially Impacted Entities

- Licensees
- NRC
- State/Local/Tribal Governments
- Other: Environmental Impacts

Potential Licensee Impacts

- Fixed Site and Transportation Security
 - Modifications for new requirements:
 - No major changes
 - For modifications needed to plans and procedures - More performance based regulations allow greater flexibility in program development
 - Material Attractiveness
 - Licensees that utilize material attractiveness would have an impact from modification of plans, procedures, programs etc.
 - However the overall regulatory burden would be reduced

Potential Licensee Impacts

- Safety/Safeguards Interface
 - New requirement, may require inclusion or awareness of additional licensee disciplines for proposed changes
 - Existing work control / configuration management changes should be used, lessening the burden
- Fitness for Duty
 - New requirement for Category I fuel cycle licensees
 - Would apply only to security officers at the site
 - May be possible to leverage licensee payroll or commercial software to lessen compliance impacts
- For All Impacts
 - Potential initial licensee staff training, long-term training costs should be minimal

Other Impacts

- NRC
 - Changes require supporting guidance development and follow-on inspections
- State/Local/Tribal Governments
 - Not required to adopt similar requirements, minimal impact
- Environmental
 - To be more fully considered during the proposed rule phase, no negative impacts anticipated

Conclusion

We are soliciting your comments on costs/impacts to better inform our process and conclusions