

April 12, 2000

MEMORANDUM TO: William D. Travers
Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary /RA/

SUBJECT: STAFF REQUIREMENTS - SECY-00-0063 - STAFF RE-EVALUATION OF POWER REACTOR PHYSICAL PROTECTION REGULATIONS AND POSITION ON A DEFINITION OF RADIOLOGICAL SABOTAGE

The Commission has approved the staff's proposed approach to re-evaluate the power reactor physical protection regulations and the proposed definition of radiological sabotage by providing performance criteria as the basis for physical protection regulations.

The staff should continue its plans to work to implement this approach in the new security regulations; test these concepts in the industry Self-Assessment Program, as appropriate; and publish this paper in the Federal Register for public comment. The staff's review of the proposed industry Self-Assessment Program should clearly articulate how the staff intends to ensure compliance with existing regulations, and in particular the regulations concerning design basis threats, under a voluntary program.

The staff should consider whether there are opportunities to further risk-inform and make these regulations performance-based. During the piloting of an industry-proposed Self Assessment Program, the staff should consider oversight of the revised security requirements and opportunities to improve performance indicators in the security area.

The staff should consider seeking feedback on the application of "margin of safety" for protecting critical safety functions.

The staff uses the terms "design criteria" and "performance criteria" interchangeably in this paper. While "performance criteria" is preferable to "design criteria," whichever term is used, it should be used consistently.

The staff should keep the Commission informed of the status of this initiative on a relatively frequent basis, by informal or formal methods as appropriate, raising issues of significant concern expeditiously.

cc: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield
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