



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
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March 22, 2001

MEMORANDUM TO: Glenn M. Tracy, Chief  
Operator Licensing, Human Performance, and Plant Support  
Branch (IOLB)  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation (NRR)

FROM: Thomas P. Gwynn, Deputy Regional Administrator */RA/*

SUBJECT: REQUEST TO REVIEW SAFEGUARDS PERFORMANCE  
ASSESSMENT (SPA) PILOT PROGRAM IMPLEMENTATION  
RESOURCES

This is in response to your March 6, 2001, e-mail, requesting a response from Deputy Regional Administrators assessing the resources required to conduct the SPA Pilot Program. Your request indicated that each region would be tasked with conducting two SPA pilot inspections and one or two OSRE inspections. Your request also indicated that the issue is one of zero sum and PBPM.

We appreciate the opportunity to participate in a meaningful fashion in this important program development activity. We strongly support the involvement in this pilot program of staff in all four regions, since we desire a full and complete assessment of the pilot and a smooth transition, if indicated by the pilot results, into consistent program implementation across all four NRC regions.

We found it difficult to complete an accurate resource assessment without additional detail concerning the resources required for the SPA pilot inspections, the nature and extent of training required for our inspection staff in support of the pilot, and the nature and extent of headquarters resources that would be available to augment regional staff in performing the pilot inspections.

Notwithstanding, the requested assessment is attached, including assumptions that were required in order to complete the assessment. Please note that our assumptions include some overtime to complete the OSREs and reliance on headquarters resources to complete the OSREs and the SPA pilot inspections.

Although we agree with Region III that some consideration needs to be provided for the potential strain imposed on regional safeguards resources by the SPA pilot, we do not agree that providing flexibility in the baseline inspection program schedule is, necessarily, the correct approach. Rather, we believe that a uniform reduction across all 4 regions of 1 OSRE during the pilot period is appropriate to offset the additional burden expected from the SPA pilot program. Any unforeseen demands (e.g., an OSRE failure) would further compound this situation.

Glenn M. Tracy

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Should you have any questions concerning this memorandum, please contact me directly. If you have questions about our assumptions or strategy, please contact Ms. Gail M. Good at 817-860-8215 or Mr. Arthur T. Howell III at 817-860-8180.

cc:

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## SAFEGUARDS PERFORMANCE ASSESSMENT (SPA) PILOT PROGRAM IMPLEMENTATION RESOURCES FOR REGION IV

As requested in your March 6, 2001, electronic message, Region IV has reviewed the resources necessary to implement the SPA pilot program and continue the Operational Safeguards Response Evaluation (OSRE) inspections. Based on the available information, Region IV made the following assumptions:

- There will be two OSREs per region during FY 2001 and two SPA pilot inspections during the SPA pilot period (May 2001 to May 2002).
- The SPA pilot program will consist of 1 week per pilot plant (no pre-meetings).
- Region IV will continue to conduct OSREs and Inspection Procedure 71130.03 inspections concurrently. While this methodology requires some overtime and long days for both the licensee and NRC inspection personnel, Region IV has determined that it is a more efficient use of NRR, contractor, and regional resources, since it reduces the annual inspection/travel requirements by 2 weeks.
- For the SPA exercise pilot inspections, NRR/IOLB will provide one person and a minimum of two contractors.

To accomplish the baseline, OSRE, and SPA pilot inspections, Region IV plans to adopt the following strategy:

- The Physical Security Inspector (PSI) will conduct 14 inspections (1 week each) to complete the annual baseline inspection procedures (71130.01, 02, and 04 and 71151 [performance indicator verification]).
- The Senior Physical Security Inspector (SPSI) will lead all SPA, OSRE, and 71130.03 inspections. It will take 9 weeks to accomplish these inspections (2 weeks for SPA pilot inspections; 5 weeks for the triennially-required 71130.03 inspections [Region IV has 14 sites] and OSRE inspections [conducted concurrently]; and 2 weeks to conduct the OSRE pre-meetings). Approximately 1 week of preparation/documentation time is estimated for each week of inspection. We anticipate that the preparation/documentation time for the team inspections will be more than that needed for a single-person, baseline inspection.
- The Plant Support Branch will continue to provide technical support to the Division of Nuclear Materials Safety by conducting the five required inspections at decommissioned plants and independent spent fuel storage installations. The SPSI will conduct three inspections, and the PSI will conduct two inspections.

This strategy results in the following workload: 12 inspection weeks for the SPSI, and 16 inspections weeks for the PSI. Using this strategy and the aforementioned assumptions, we have determined that Region IV can incorporate the additional workload from the SPA pilot program without an increase in staff or a reduction in planned inspection activities.