

November 16, 2001

MEMORANDUM TO: Glenn M. Tracy, Chief  
Reactor Safeguards, Radiation Safety,  
and Emergency Preparedness Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

FROM: Alan L. Madison, Chief */RA/* for Garmon West  
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Reactor Safeguards, Radiation Safety,  
and Emergency Preparedness Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE OCTOBER 10, 2001, PUBLIC MEETING TO  
DISCUSS REVISIONS TO THE PHYSICAL PROTECTION  
SIGNIFICANCE DETERMINATION PROCESS

On October 10, 2001, the NRC staff held a public meeting with representatives the Nuclear Energy Institute (NEI), industry and the public. The purpose of this meeting was to discuss proposed changes to the Physical Protection Significance Determination Process (PPSDP). NRC opened the meeting and presented a summary of the previous meeting, held on this subject, on August 30, 2001, as well as, a model that attempted to integrate concepts from NRC and NEI models discussed at the August 30, 2001, meeting (Attachment 1). Representatives from the Nuclear Energy Institute followed by presenting a revised version of their proposed PPSDP (Attachment 2). Representatives from Union of Concerned Scientists and Nuclear Information Resource Services did not provide written materials, but did participate openly in the discussions.

There was general consensus among the participating stakeholders that work should continue in a direction that is aligned with the models presented by the NRC and NEI and that the efforts toward refining the current model should be abandoned. This is largely due to two factors: (1) the inherent subjectivity with the existing model and (2) given the assumed direction that drill and exercise requirements will be codified, the model should reflect the importance of licensee drills and exercises.

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In broad general terms the position of the stakeholders at this stage of the process is as follows:

The NRC staff presented in Attachment 1. The concepts in Attachment 1 are in alignment with the NEI view that whatever ultimate model is adopted, it should complement an anticipated exercise rulemaking.

NEI did not take significant exception to the analysis in Attachment 1, but considers that the NRC is inappropriately placing too much weight on performance during a periodic (3 yrs at this point) evaluated exercise and considers that performance should be evaluated on an integration of the entire training and exercise cycle. NEI considers that the model should allow for drill and exercise purposes, that certain deficiencies, particularly those not associated with a strategy deficiency, should not become findings provided they are self identified, properly critiqued and dispositioned.

UCS objected to adopting an Emergency Preparedness-like model for the Physical Security Significance Determination Process, but after listening to dialogue concerning the two revised models did not have strong objections to the direction being pursued. The public stakeholders were critical of the NEI model in that it does not provide for a red or unacceptable condition.

The schedule for the next meeting is to be determined.

The above information and the Attachment 1 and 2 documents were shared and discussed between NRC staff, NEI representatives, and the public, and are not intended as verbatim records. Attachment 3 lists the attendees at the October 10, 2001, public meeting.

Attachments: As stated.

cc: R. Beetle, NEI  
R. Rose, NEI  
E. Lyman, NCI  
D. Lochbaum, UCS  
P. Gunter, NIRS

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