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FROM: DUE: 11/05/02 EDO CONTROL: G20020617
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FINAL REPLY:

Howard Ris
Union of Concerned Scientists

TO:

Chairman Meserve

FOR SIGNATURE OF : ** PRI ** CRC NO: 02-0692

Chairman Meserve

DESC:

Nuclear Plant Security Changes Enacted and Planned in the Wake of Last Year's Terrorist Attacks

ROUTING:

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Burns/Cyr

DATE: 10/25/02

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NSIR Zimmerman

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AUTHOR:	Howard Ris		
AFFILIATION:	UCS		
ADDRESSEE:	Richard Meserve		
SUBJECT:	Ack comm's ltr of 9/6/2002 outling the nuclear plant security changes enacted and planned in the wake of last year's terrorist attacks.....		
ACTION:	Signature of Chairman		
DISTRIBUTION:	Chairman, Comrs, RF		
LETTER DATE:	10/07/2002		
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Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions

October 7, 2002

Dr. Richard A. Meserve, Chairman
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Meserve:

Thank you for your letter of September 6th outlining the nuclear plant security changes enacted and planned in the wake of last year's terrorist attacks. I also acknowledge and appreciate the many long hours expended by you, your fellow Commissioners, and staff developing these changes.

We have a number of additional recommendations for improving nuclear plant security. To highlight some of these recommendations:

- Your letter described the value of enhanced access control in preventing insiders from providing significant assistance to external attackers. These measures could be strengthened further if they were supplemented by actions designed to detect whether insiders have leaked safeguards information to unauthorized persons. Only a small subset of the work force at a nuclear power plant has access to vital information about the plant's physical protection systems and security response plan. Periodic polygraph tests administered to these few workers might reveal (as well as deter) a leak before external attackers receive enough information to plan a successful attack.

- Your letter outlined steps taken to enhance access control to the protected area of a nuclear power plant. In our letter dated November 29, 2001, to Mr. Glenn Tracy of your staff, we provided several recommendations that we believe would further improve access control. For example, we recommended the "two-person" rule for entry into vital areas of the plant, armed security guard escorts when persons with visitors' badges enter vital areas, and a revision to the safety evaluations performed under 10 CFR 50.59 to explicitly require a determination whether a proposed activity unduly increases the threat of insider sabotage.

- Security cameras used at nuclear power plants today are outward looking. Using in-plant cameras to monitor workers in vital areas could significantly reduce the potential for sabotage/tampering of safety equipment.

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- Your letter described new requirements for increased security patrols at nuclear power plants. Despite the hiring of new security guards at many plants, however, it appears that these requirements are being met though chronic reliance on overtime. Five and six 12-hour shifts per week are not uncommon for security personnel week after week. We understand that a rulemaking proceeding on working hour limits currently includes key security personnel within its scope. But it will be many months, if not years, before this rulemaking proceeding produces a final rule. In the meantime, the NRC should clearly communicate its expectations on working hour limits—which are intended to prevent performance impairment caused by fatigue—for key security personnel. We detailed these concerns in our letter dated April 13, 2001, to Mr. Glenn Tracy of your staff.

- We are encouraged to learn that full security performance reviews will be conducted at each nuclear power plant on a three-year cycle rather than the eight-year cycle required up until now. That good news is tempered by the fact that no force-on-force exercises have been conducted in over a year, and, to the best of our knowledge, none are scheduled for the near future. We urge you to correct this deficiency as soon as possible.

I appreciate receiving your status report and the opportunity to provide this feedback. To enhance the exchange of information on this important topic, I would like to invite you, your fellow Commissioners and/or member(s) of your staff, to a meeting at our office in Washington, DC. The meeting, conducted by our nuclear safety engineer, David Lochbaum, would feature short presentations by public interest groups on their security concerns and related recommendations. At your discretion, we would gladly incorporate time into the agenda for you to share your views on the general status of nuclear plant security. By the end of the meeting we would hope to have provided you with a clear picture the public interest community's concerns about nuclear plant security.

Please contact David Lochbaum in our DC office at (202) 223-6133 if you would like to proceed with the idea of having a meeting. We would be pleased to set it up for a mutually convenient time. Thank you again for your letter updating us on recent NRC actions in the security area.

Sincerely,

Howard Ris
President

cc: David Lochbaum, Nuclear Safety Engineer