

D R A F T

LIMITED DISTRIBUTION NEED TO KNOW
NOT FOR PUBLIC DISTRIBUTION

General recently issued a new policy indicating that the Department of Justice will defend agency decisions to withhold records that rest on a sound factual and legal footing.

CRITERIA TO BE USED WHEN DECIDING TO MAKE A DISCRETIONARY RELEASE OF INFORMATION TO THE PUBLIC

In addition to withholding information properly determined to be exempt from disclosure, such as classified, proprietary, privacy or safeguards information, you should consider **not** releasing a document if it contains:

1. A consolidation or collection of plant-specific information that might be used to exploit site-specific features including equipment and specific facility locations. Examples would include Final Safety Analysis Reports (FSARs), Plant Information Books, Emergency Plans, Individual Plant Examination for External Event (IPEEE) material, risk-informed inspection notebooks, and other risk and facility vulnerability information.
2. Specific locations of the facility site. For information that is posted to the web, limit these descriptions to city and state. Geospatial coordinates should not be made public through any means. As a practical matter, addresses on licensee correspondence can still be made public via ADAMS. Staff should seek alternatives to holding public meetings at licensee sites and avoid posting precise site addresses on the public meeting web site.
3. Physical vulnerabilities or weaknesses, or potential weaknesses of nuclear facilities that could be useful to terrorists, such as site specific security measures, access controls, or personnel clearance procedures.
4. Construction details of specific facilities, such as wall thicknesses or specific barrier dimensions, detailed diagrams, schematics, or cutaways of specific plant designs. Where appropriate, general descriptions instead of exact numbers (i.e. "several feet, several inches, layers of concrete") should be used for general public information.
5. Information which could be useful to defeat or breach any barriers at nuclear facilities.
6. Details regarding quantities of radioactive material present or authorized.

Alternative Wording for Criteria #1 to be Used When Deciding to Make a Discretionary Release of Information to the Public

In addition to withholding information properly determined to be exempt from disclosure, such as classified, proprietary, privacy or safeguards information, you should consider **not** releasing a document if it contains:

1. A consolidation or collection of plant-specific information that might be used to exploit site-specific features including equipment and specific facility locations. **Examples would include portions of the Final Safety Analysis Reports (FSARs) that contain detailed drawings of the site and plant structures. Such drawings depict facility layouts, locations of vital equipment within plant buildings, and construction details of plant structures.** Other examples of these types of documents include Plant Information Books, Emergency Plans, Individual Plant Examination for External Event (IPEEE) material, risk-informed inspection notebooks, and other risk and facility vulnerability information.