

Required Reading 02-14
May 30, 2002

Memorandum to: HOO Section
From: Tim McGinty
Subject: EVENT RELEASE SCREENING CRITERIA FOR POSTING ON THE
PUBLIC WEBSITE

Purpose

Staff Requirements Memorandum (SRM) COMSECY-01-0030 - "GUIDANCE TO THE STAFF ON RELEASE OF INFORMATION TO THE PUBLIC", dated 1/25/02, contained the following information pertinent to releasing plant status and event reports on the public web-site:

CRITERION 22. The staff should withhold information in any type of agency document (e.g., plant status report, press release) that provides the current status or configuration of systems and equipment that could be used to determine facility vulnerabilities if used by an adversary. This does not include general conditions such as 100 percent power or shutdown.

This Required Reading implements the screening criteria developed to ensure that event reports due not release facility vulnerabilities useful to an adversary.

Background:

Following the terrorist acts of 9/11/01, routine publication of event and plant status reports on the Agency public web-site was withdrawn.

Plant Status reports, in an abbreviated format (without the comment field), were restored to the public web-site on March 15, 2002. NRR's Generic Communications Branch continues to work on developing an archive database for plant status, and an update routine which releases the entire plant status report (non-abbreviated) after a one-month withholding period.

The following screening criteria was developed to provide guidance to the HOO on the releaseability of events to NRR for posting on the public web-site. A dry-run of the event release criteria, which included daily event review by NSIR/DNS staff, commenced on April 24, 2002 to identify any potential issues. On May 30, 2002, NRR authorized the re-posting of events to the public web-site, based on the files provided by the HOO after screening the events. NRR will also, in the future, be assembling an event release archive and will be coordinating with DIRO regarding the release of events that are withheld based on the attached guidance, presumably after a 30 day withholding period.

Action:

HOO's should implement the Attachment 1 guidance prior to the morning release of events.

Attachment 2 summarizes pertinent information as a result of the dry-runs, and should be consulted additional information. Attachment 2 should be used by the HOO's to capture any web-site posting lessons learned by manually recording them for incorporation into future guidance revisions, as necessary.

Attachment 3 is a summary of pertinent information relevant to event and plant status files and releases as an aide to increase understanding and awareness, and can also be used to manually capture additional information.

Y-17

HOO GUIDANCE ON SCREENING EVENT REPORTS FOR RELEASE - ATTACHMENT 1

CRITERION 22. The staff should withhold information in any type of agency document (e.g., plant status report, press release) that provides the current status or configuration of systems and equipment that could be used to determine facility vulnerabilities if used by an adversary. This does not include general conditions such as 100 percent power or shutdown.

Procedure: Deciding which Event Reports should have a delayed release date in response to Criterion 22.

Most of the Event Reports that are received report a condition that occurred and is already corrected. Also, the facility could have placed itself in a condition where the problem no longer exists or compensatory measures that provide an acceptable substitute are in place. An example would be the reactor plant has been placed in a mode of operation where the disabled equipment is not required per the plant operating procedures or technical specifications.

The staff will use the following process to evaluate each Event Report. The following questions should be assessed, **in order**, until a conclusion to release the event report is reached, or a decision to not release the event report is reached at the conclusion of all the questions.

1. Does this Event Report contain information that could be used to determine facility vulnerability? If yes, go to next question. If no, go ahead and release normally.
2. Does the condition reported still exist such that it increases facility vulnerability? If yes, continue to next question. If no, go ahead and release normally.
3. Is the condition reported still a potential vulnerability, taking into consideration present plant operational conditions and adequate compensatory measures in place? If yes, continue to next question. If no, go ahead and release normally.
4. Is the event reported an emergency declaration (versus a non-emergency report)? If yes, there are offsite notifications (and often press releases) made by the licensee, go ahead and release normally. If no, go to next question.
5. Is the event reported going to have press or public interest? If yes, release the event, but the event write-up should not reveal specific information that identifies the vulnerability (such information should be restricted to the "miscellaneous" field which does not get released with the event report). Example: a fire in an emergency diesel generator that renders it inoperable would be reported as a fire on site without further information that reveals the vulnerability. If no, delay release.

Event Reports that meet the conditions above will be released by 7 A.M. on normal business days for posting on the NRC's public website.

Event Reports that are withheld will be delayed in their release for a period of 4 weeks, as it is expected that vulnerabilities will have been mitigated. HOO's will notify the DIRO Management of all events that are withheld as a result of the application of this criteria.

If there is any doubt regarding the release of a given event, don't send it out.

Attachment 1

ADDITIONAL INFORMATION AND LESSONS LEARNED - ATTACHMENT 2

1. Event descriptions should not contain references to security commitments relevant to NRC Orders, particularly any details regarding actions taken.
2. Compensatory measures taken for security as the result of an event, for instance relevant to a tornado, should not be released as they may present a vulnerability that could be exploited in the future.
3. Information regarding likely on-going police investigations, for instance, investigations regarding tampering EP sirens, should not be released (note: For HOO awareness, preventing the release of security events remains in place in accordance with long-standing NRC policy).
4. **RELEASABILITY OF FUEL CYCLE EVENT REPORTS** - Before releasing Fuel Cycle event reports to the NRC Public Web site make sure that the limits of Nuclear Criticality Safety Controls factor limits; mass, volume, spacing, are omitted. If the enrichment of U235 is greater than 20% use HEU in lieu of 25 wt % U235.

Examples of what not to include:

- a. xxx grams of 1% U235 is 45% of its critical mass
- b. The spacing limit between barrels/cylinders is x feet.
1. Criticality volume limit has to be less than xxx cubic centimeters
2. The as found condition exceeded the analyzed geometry limit of ## inches.
3. The mass limit (xxxx g) was not exceeded

Status and Event Release Information - Attachment 3

Plant Status:

1. HOO file has everything.
2. S:\shared\events\020506pr.wp accessed inside the NRC has everything.
3. Public web site has Plant Name and Power only.

Event Notifications

1. HOO file has everything including miscellaneous information.
2. S:\shared\events\020506en.wp (also S:\IRO\events\entoday.mal) accessed inside the NRC lists all the events and details for a single day. Note: Security events only provides the plant name and a note to the effect that this is a security event and call the HOO for additional details.
3. Public web site would (S:\IRO\events\Xentoday.mal) lists all the events and their details that are released to the public for that day. It does not list Agreement State event number or details until they have met the defined delay time. It does not list event number or detail of security events ever. It does not list the events that were withheld based on Criterion 22, they will be released such that the historic record will be updated after 28 days.

NOTE:

1. Agreement State reports will appear twice for the NRC, once on the day of report and the second time after the defined delay.
2. The public web site historic data will be updated with any delayed release event report after the defined delay. It will show up in the historic data for the day it was reported, not be released again like new event.