

From: William Dean *NRR release*
 To: *RI* - Blough, A. Randolph; Brockman, Ken; Casto, Charles; Coe, Doug; Grant, Geoffrey; Grobe, John; Howell, Art; Lanning, Wayne; Plisco, Loren; Tracy, Glenn *NSIR*
 Date: Fri, Mar 15, 2002 8:54 AM
 Subject: Re: Hydrogen Storage Location information sensitivity

Glenn, et. al,

I am concerned about the judgements being applied here relative to SGI vs. sensitive vs. releasable to the public. The Commission was pretty clear in its guidance that a very high threshold be applied to determining if information should not be public. (i.e., does it provide a clear and significant benefit to a terrorist in a potential attack - and is it information that only we and the licensee control). Careful consideration needs to be made as to whether this is indeed the case here. I expect Doug and Alan to look more carefully at what is being reported (perhaps the region 1 limerick report can help) and determine if indeed we need to treat this info as SGI or at least define language that will convey needed info without this restriction.

>>> Glenn Tracy 03/14/02 08:11AM >>> *NSIR - release*
 Geoff:

All great points. I was briefed on this yesterday and we should dialogue further, as necessary. I fully support Doug and Alan's initial call and advisory. It is the culmination of this hydrogen effort and the potential use of the info and its being reported out that is sensitive post 9/11. The sensitivity to this is similar to that of other issues being raised as you indicate. Formal policy on these calls remains rather flexible and done by consensus currently, until Admin/NRR can find resources to staff changes to SGI guidance which is likely to be months in the future. I realize that some detailed information on a specific event may get through the initial screen, but think we are catching the larger, more global efforts that would be considered sensitive/SGI. There is also the new category of OHS info that will bear upon the new guidance. Glenn

>>> Geoffrey Grant 03/13/02 07:53PM >>> *RII - release*
 Perhaps someone could get us on the phone and discuss how this came about - also, does this mean that the licensees should be classifying their FSARs as safeguards information? What about other licensee documents that have this information in them? A broader question: What about on site or near site propane storage tanks (both permanent and temporary)? In hindsight, should those have been (or now be) included in this TI? I raised that question here in RIII in the wake of last week's Unusual Event at Point Beach where there was a leaking propane storage tank just outside the PA fence. Shouldn't this be looked at under the same light?

>>> Doug Coe 03/13/02 04:58PM >>> *NRR - release*
 To: Regional DRS/DRP Directors, cc: Deputy Directors

I have just been notified that NRR/DIPM/IRSB (Glenn Tracy and Alan Madison) has determined that plant-specific information concerning the location and other details of hydrogen storage facilities that we write for an inspection report or other document **should be treated as Safeguards Information**. This applies to any information being prepared for inclusion in inspection reports or transmittal to NRR, as directed by Temporary Instruction 2515/146 "Hydrogen Storage Locations". This TI is implemented as an addendum to IP 71111.05, therefore this email is addressed to both DRS and DRP addressees.

REQUESTED ACTION:

- 1) Please classify any information that inspectors have already developed, during implementation of TI 2515/146, as Safeguards Information and treat accordingly.
- 2) Please notify D. Frumkin, E. Weiss, and myself of any inspection reports or other documents containing results or questions from TI 2515/146 that have already been made public or transmitted to NRR and that should be redacted or classified as SGI.

A change to TI 2515/146 has been initiated and will provide formal guidance.

PP - 24

B-167

Please refer any questions regarding threshold for SGI classification to IRSB (J. Peralta or A. Madison).

Doug Coe

CC: Boger, Bruce; Caldwell, James; Caniano, Roy; Christensen, Harold; Collins, Elmo; Crlenjak, Richard; Foley, Thomas; Frumkin, Daniel; Haney, Catherine; Holian, Brian; Johnson, Michael; Kleeh, Edmund; Koltay, Peter; Landau, Mindy; Madison, Alan; McCree, Victor; Ordaz, Vonna; Peralta, Juan; Reynolds, Steven; Silvious, A. Lynn; Weber, Michael; Weiss, Eric

From: Daniel Frumkin
To: William Reckley *> WRR*
Date: Fri, Mar 15, 2002 8:56 AM
Subject: Fwd: Re: Hydrogen Storage Location information sensitivity

More information on H2 SGI,

Dan

From: William Reckley
To: Daniel Frumkin
Date: Fri, Mar 15, 2002 10:12 AM
Subject: Fwd: Re: Hydrogen Storage Location information sensitivity

release

Thanks...I had gone down to talk with Alan et. al. and they were trying to recover yesterday. A simple way to resolve this may be to have the TI call for the inspection and the inspection report only document that the inspection was performed and whether or not any immediate issues were identified. The regions could then send the actual data to NRR using internal (sensitive) memoranda. Depending on how this turns out, we may need to reprofile the existing report (from the informal surveys) in ADAMS from public to non-public. I'll try to keep up with the decisions that come out of the safeguards group.