

NP 1.7.23

SECURITY EVENT REPORTING PROCEDURE

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Title: Security Event Reporting Procedure		
Approval: (Signed copy on file)		
<u>Brian Linde</u> Director of Security		

Submit comments

NOTE: This procedure has been issued as an NMC Fleet Procedure; individual sites must authorize its use at their site in accordance with their site-specific review and approval process.

INFORMATION USE

- Procedure should be available, but not necessarily at the work location.
- Procedure may be performed from memory.
- User remains responsible for procedure adherence.

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1.0 PURPOSE

This procedure provides guidance for classifying and reporting a safeguards (security) event to the NRC in accordance with 10 CFR 26.73, 10 CFR 73.71(b) and (c), and 10 CFR 73 Appendix G.

2.0 APPLICABILITY

This procedure applies to notification of safeguards (security) events within one hour of discovery followed by a written report of the event, submitted within 60-days (written follow up report). This procedure also applies to events that require to be logged within 24 hours. Notification to the NRC Operations Center of reportable events should be accomplished via the emergency notification system (ENS). If the ENS is inoperable, notification should be made using commercial telephone lines or fax. Certain events may also require that the plant Emergency Plan be activated and an emergency classification be declared.

3.0 RESPONSIBILITIES

- 3.1** The senior reactor operator (SRO) may suspend security measures in accordance with provisions of 10 CFR 50.54(x) and (y).
- 3.2** The Security Manager SHALL draft written 60-day safeguards event reports to the NRC as required and submit such reports to the Manager, Regulatory Affairs for review and submittal to the NRC on form LER 366 in accordance with plant licensee event reporting protocol.
- 3.3** Security Shift Supervisor:
- 3.3.1** The Security Shift Supervisor SHALL notify the SRO immediately following the discovery of a potential one-hour reportable safeguards event. Certain events require initiation of Emergency Plan declarations.
- 3.3.2** The security supervisor SHALL immediately initiate measures to compensate for the reduced effectiveness of the security system and communicate those measures to all on-duty security personnel. The measures must be implemented within the time period specified in site-specific compensatory measure procedures (the time period is a graded period dependent on vulnerability). The Security Shift Supervisor SHALL inform the SRO of compensatory measures implemented and when such measures have been terminated.

- 3.3.3** Unless specifically directed otherwise by the SRO, the Security Shift Supervisor SHALL perform the one-hour ENS notification to the NRC following discovery of the safeguards event. Verbal notification may be documented on form NRC 361 or a site-specific security event reporting form.
- 3.3.4** The Security Shift Supervisor SHALL ensure that appropriate members of plant and security management are kept informed of the status of the safeguards event, including compensatory measures initiated and/or terminated and long-term corrective actions initiated. Such notification should include the NRC resident inspector and the plant regulatory compliance supervisor.
- 3.3.5** The Security Shift Supervisor SHALL initiate work orders action requests or other corrective maintenance documents needed to resolve the event and ensure needed testing or evaluations are complete prior to discontinuing compensatory measures.

4.0 DEFINITIONS

- 4.1 Safeguards Security Event-** Any failure, degradation, or discovered vulnerability in a safeguards system that could have allowed unauthorized or undetected access to a protected area (to include Independent Spent Fuel Storage Installations, ISFSI's), vital area, or transport had compensatory measures not been established. Any other threatened, attempted, or committed act not previously defined in 10 CFR 73 Appendix G. The potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan or the actual condition of such reduction in effectiveness.
- 4.2 Contraband-** Unauthorized items and materials whose normal and customary usage presents a reasonable likelihood that it will be used to cause significant physical damage or interrupt normal plant or security operations. Such items, material or articles include explosive or incendiary devices, firearms, ammunition, bows and arrows, and any items designated as offensive or defensive weapons (e.g., martial arts type weapons, OC/CS/CN type containers or devices, etc.).
- 4.3 Credible threat-** A credible threat is (a) a threat notification from an official verified source (e.g., FBI, NRC, Site Security Officer on patrol) and the source believes the threat is credible or a "high risk probability", or (b) a threat determined to be credible by NMC Security and Senior Management.
- 4.4 Discovery-** An event is considered to be "discovered" at the time the discrepancy or condition occurred unless there is firm evidence to indicate that it occurred at another time.

- 4.5 LER (Licensee Event Report)-** NRC Form 366 is used to provide 60-day written notification of a security event. The LER is submitted by plant Regulatory Affairs in accordance with station protocol for LER submittals.
- 4.6 Loggable Events-** Events that require logging within 24 hours.
- 4.7 Properly Compensated-** Those measures specified in the Security Plan Implementing procedures or Safeguards Contingency Plan Implementing procedures, implemented with in the time period specified in site-specific compensatory measure procedures.. The time period is a graded period dependent on vulnerability. If extenuating circumstances prevent compensation within that time, the event need not be a one-hour reportable event provided there was no malevolent intent, nothing adverse resulted from the delay, and the licensee takes appropriate measures to ensure a more timely response or other necessary action in the future. In these cases, the cause of the delay should be noted in the log entry.
- 4.8 Reportable Events-** Events that require one (1) hour or twenty-four (24) notification to the NRC Operations Center via the ENS.
- 4.9 Interruption of normal operations-** Conditions causing an interruption of plant operations, inability to start up or shutdown, forced plant shutdown, or significant power de-rating or otherwise causing substantial economic cost or harm.
- 4.10 Malevolent intent-** The actual demonstration of intense ill will, spite, or hatred, either physically or verbally by an individual, and directed toward a specific target area or group.
- 4.11 Prohibited Items-** Prohibited items whose normal or customary usage may not present an immediate danger to the site or interrupt normal plant or security operations but are prohibited from the site. Such items, material or articles include: alcohol, to include all non-alcoholic type beer and wine. Illegal or unauthorized controlled substances, cameras that do not have an approved camera permit, etc.
- 4.12 Security events-** Actual, explicit or potential events that, if unchecked, could result in safety significance to the extent that a radiological release of the magnitude defined in 10 CFR 100 might occur. Events that threaten nuclear activities or lessen the effectiveness of a security system or program as established by 10 CFR 73 and 10 CFR 26.
- 4.13 Security Event Log-** Logs initiated and maintained by the Shift Security Supervisor to logging security events within 24 hours of discovery as required by 10 CFR 73.71 and 10 CFR 26.

- 4.14 Security Shift Supervisor-** The senior security force member on duty (e.g., Captain, Shift Commander, etc.).
- 4.15 Security systems or programs-** Equipment, hardware, software, personnel procedures, or training that compose the physical security or Fitness for Duty programs necessary to meet 10 CFR 73 and 10 CFR 26.
- 4.16 Significant Fitness for Duty Event-** As defined in 10 CFR 26.73 (a), sale, use, possession or introduction of illegal drugs within the protected area, any acts by a licensed operator or supervisor involving the sale, use, or possession of a controlled substance, resulting in confirmed positive tests on such persons, involving use of alcohol within the protected area, or resulting in a determination of unfitness for scheduled work due to the consumption of alcohol.
- 4.17 Significant physical damage-** Physical damage to security or plant equipment to the extent the equipment cannot perform its normal function or such damage causes the interruption of normal operation.
- 4.18 Significant safeguards information-** Security plan, security contingency procedures, contingency response plan and target sets, security officer training and qualification program elements that disclose contingency responses.
- 4.19 Supplemental information-** Information that significantly alters the context of an initial investigation, notification or written report in such a way that it would reasonably be expected to impact the analysis of the information or effect conclusions drawn from the initial review.
- 4.20 Suspicious Activity-** Any individual(s), vehicle or aircraft behaving or operating in a suspicious manner on or near site property. Suspicious activities may be precursors to threats, security or contingency events.
- 4.21 Tampering-** Malicious manipulation of damage to safety-related and/or security equipment.
- 4.22 Unauthorized Individuals-** Any unescorted person in an area to which the person is not authorized unescorted access.

5.0 REQUIREMENTS

5.1 GENERAL

- 5.1.1** Each NMC site security organization SHALL develop its own site-specific procedure that identifies appropriate compensatory measures for the security events detailed in this procedure (see "Attachments"). The site procedure SHALL conform with the event descriptions in Attachment 2-31 of this procedure. The compensatory measures SHALL be designed to counter the effects of a loss, failure, or degradation of a component or feature of the security program, to include the Fitness for Duty program

Also, each NMC site security organization SHALL ensure they have procedures that specify suspension of safeguards; the process for rotating keys and locks; and the operational process for logging and reporting security events. Each NMC security organization SHALL also insert any site-specific documentation and reports in the "Required Documentation" column in Attachments 2-31 (e.g., Action Request).

- 5.1.2** When responding to the loss, failure, or degradation of a component or feature of the security program, available information SHALL be evaluated concerning the nature and extent of the problem. This evaluation permits for the appropriate compensatory measure required to mitigate the loss, failure, or degradation. Therefore, there has been no attempt to catalog every possible scenario involving security system or program degradations.
- 5.1.3** When a loss, failure, or degradation of a component or feature of the security program is discovered, it SHALL be immediately reported to security.
- 5.1.4** The Security Shift Supervisor SHALL assess the loss, failure or degradation and decide on the appropriate compensatory measures to be initiated.
- 5.1.5** An entry SHALL be made as appropriate (e.g., activity report, event log) to describe the loss, failure, or degradation and the action taken to compensate for the loss, failure or degradation.
- 5.1.6** When loss, failure or degradation of security related equipment or components are discovered, action SHALL be initiated to have the equipment or component repaired and returned to service as soon as practical.
- 5.1.7** When equipment or components are repaired and returned to service they SHALL be tested in accordance with established procedures prior to termination of compensatory measures. An entry SHALL be made as appropriate (e.g., of the equipment or component being returned to service and termination of compensatory measures) in the appropriate activity report and/or event log.

5.1.8 Proper compensatory measures are required to be implemented and fully established within the time period specified in site-specific compensatory measure procedures. However, if extenuating circumstances prevent compensation within the specified time periods, the event may not need to be reported to the NRC as a one (1) hour report for failure to properly compensate provided:

1. The cause for the delay is properly documented.
2. There was no malevolent intent associated with the delay.
3. Nothing adverse resulted from the delay.
4. Appropriate measures are taken to ensure a more timely response or other necessary action in the future.

5.1.9 The four (4) elements listed above that are necessary to mitigate the delayed compensatory measure from a one (1) hour reportable to a loggable event may require an investigation. The investigation must be timely though not necessarily within the first hour following the failure to properly compensate. Should an investigation determine that it is not possible to satisfactorily meet all four steps, a one (1) hour report to the NRC Operations Center is required. The one-hour clock starts from the time of discovery, however, if an investigation is necessary to determine if there was an event, the one-hour clock starts from the time the decision is made that an event did occur.

5.2 SECURITY EVENT LOGS AND SECURITY EVENT REPORTING

5.2.1 Attachment 1 is formatted into various functional areas of physical security and provides for a quick reference to the corresponding Security Event Reporting attachments. The attachments are designed to provide fleet wide guidance for determining if a security event is a one-hour reportable event or a loggable event.

5.2.2 The following steps should be used to determine significance of a security event:

NOTE: Should reasonable doubt exist on whether an event is loggable or a one (1) hour reportable, the most conservative reporting criteria should be implemented. Retractions of a loggable or one hour report may be made following an in depth investigation of the event.

1. The event required the implementation of Security Contingency Plan criteria and Security Contingency Procedures to mitigate or rectify the event.

OR

2. The event was not compensated or was compensated after an extended period of time and one or more of the four (4) criteria listed within Section 5.1.9 were not met.

OR

3. The event allowed for, or provided a high probability of allowing for, unauthorized or undetected access or radiological sabotage, or theft of special nuclear material.

OR

4. The event meets the criteria of a fitness for duty event.

OR

5. The incident has the potential to gain media attention

5.2.3 Loggable, and one-hour and 24 hour reportable security events SHALL be logged in the appropriate site activity report and/or event log.

5.2.4 An event not covered within the applicable attachments of this procedure should be compared to the criteria found within Section 5.2.2 for one (1) hour reportability. If the criteria of Section 5.2.2 do not apply to an unlisted event, the event should be logged.

5.2.5 Any planned event properly compensated for prior to the work (i.e. equipment out of service, hole in wall, etc.) SHALL be properly documented.

5.2.6 Log time and Date SHALL be the actual time and date that the event was logged on the form. Events SHALL be logged within 24 hours of the event occurrence.

1. The Component ID i.e.: Door #, Monitor #, HOST A, HOST B, etc.
2. The Time and Date SHALL be the actual time the event was discovered.
3. Enter environmental Condition as appropriate for CCTV and PIDS events only.
4. Enter Time and Date component was returned to service. If component was out of service past 24 hours, place "continued" in this box.
5. The reason for Loss/Event Occurrence is an explanation of the event and what caused the event, and/or the related affects.

6. Compensatory Measures taken are an explanation of exact compensation taken as outlined in the site specific procedure.

5.2.7 If a loggable event has not been appropriately logged within 24 hours, the log entry SHALL fully describe the reasons why it has not been appropriately logged.

1. When several cameras or zones are taken out of service within a reasonable time period due to environmental conditions, list all affected *components as one entry*.
2. Event numbers SHALL be logged on an index and maintained by the Security Shift Supervisor.

5.2.8 Contacts with Off-site Government Agencies

1. A courtesy call to the NRC about a suspicious activity does not require a 4-hour report to the NRC, as would be required under 10CFR50.72(b)(2)(xi). For more significant events, or if it is later determined a suspicious activity (relayed to the NRC) may threaten the health and safety of the public or on-site personnel, or protection of the environment, site operations should determine if the NRC Operations Center should be notified via 4-hour report in accordance with 10CFR50.72 (b)(2)(xi).
2. Routine contact with off-site government agencies, such as for traffic control issues, exchanging information, setting up meetings or tours, etc. do not require an NRC courtesy call.

6.0 RECORDS

The 60-day LER submitted on form NRC 366.

7.0 REFERENCES

7.1 SOURCE DOCUMENTS

1. NUREG-1045, "Guidance on the Application of Compensatory Measures for Power Reactor Licensees"
2. Regulatory Guide 5.65, "Vital Area Access Controls, Protection of Physical Security Equipment, and Key and Lock Controls"
3. Regulatory Guide 5.62, "Reporting of Safeguard Events"
4. NUREG 1304, "Reporting of Safeguards Events"

5. NRC Generic Letter 91-03, "Reporting of Safeguards Events"
6. NRC Information Notice 89-05, "Use of Deadly force by Guards Protecting Nuclear Power Reactors Against Radiological Sabotage"
7. NUREG/CR-6190 "Protection Against Malevolent Use of Vehicles at Nuclear Power Plants"
8. NEI 96-01 "Nuclear Power Plant Guidelines for Operational Planning and Maintaining Integrity of Vehicle Barrier Systems"
9. NRC Generic Letter 89-07, "Contingency Planning for Surface Vehicle Bombs"
10. NUREG 1354, "Fitness for Duty in the Nuclear Power Industry, Responses to Public Comments"
11. NUREG 1385, "Fitness for Duty in the Nuclear Power Industry, Responses to Implementation Questions"
12. 10 CFR 26.73 (a) through (c)
13. 10 CFR 73.71 (b) and (c)
14. 10 CFR 50.72 (b) (2) (xi), as amended
15. NRC Order dated February 25, 2002
16. Information Assessment Team Advisory for Power Reactors (IA-03-08), March 5, 2003

7.2 REFERENCE DOCUMENTS

None

7.3 COMMITMENTS

None

8.0 REVISION SUMMARY

<u>Section</u>	<u>Change</u>
4.0 Definitions	Aligned definitions of "Credible Threat" with SE 0024. Added a definition for "Suspicious Activity".
5.2.8 and Attachment 22	Updated notification guidelines for suspicious activities.

9.0 ATTACHMENTS

1. Attachment 1 Functional Security Areas Table
2. Attachment 2-31 See Attachment 1

**Attachment 1
Functional Security Areas**

Functional Security Areas	Page (s)	Attachment
Access Control, Access Authorization & FFD	14-17	2
Isolation Zones	18	3
Perimeter Intrusion Detection System (PIDS)	19	4
Protected Area Fence	20	5
Protected Area Barrier (Excluding Fence)	21	6
Protected Area Gates	22	7
Protected Area Doors and Hatches	23	8
Search Equipment	24	9
Closed Circuit Television System (CCTV)	25	10
Illumination	26	11
Security Area Barriers	27	12
Security Area Doors, Windows, Hatches	28	13
Vital Area Barriers & Bullet Resistance Criteria	29	14
Vital Area Doors, Windows, Hatches	30	15
Card Readers	31	16
Central and Secondary Alarm Stations (CAS/SAS)	32	17
Computers	33	18
Intelligent Multiplexers (IMUX)	34	19
Power Supply	35	20
Communications	36	21
Tampering, Line Supervision, Sabotage and Other Suspicious Activities or Criminal Acts	37-41	22
Security Key Cards	42-44	23
Keys and Locks	45	24
Manning, Performance and Response	46-47	25
Safeguards Information	48	26
Vehicles	49	27
Incoming Packages and Materials	50	28
Vehicle Barrier System (VBS)	51	29
Special Nuclear Material and Spent Fuel	52	30
Suspension of Safeguards	53	31

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ATTACHMENT 2 – Access Control, Access Authorization & FFD

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	<p>Emergency Vehicles/ personnel let into Protected Area without search, personnel not badged</p> <p>A. While continuously escorted by a badged employee cleared for the respective plant location.</p> <p>B. With No escort</p> <p>C. As part of exercise or drill and prior notification has been made to the NRC.</p>	<p>(Enter site-specific compensatory measures or actions)</p>	<p>(Enter site-specific, graded time period)</p>	<p>(Site-specific)</p>	<p>A. Loggable</p> <p>B. One-hour Reportable</p> <p>C. Loggable</p>
2	<p>Improperly authorized security clearance due to incomplete pre-employment screening records (including falsification of a minor nature) or inadequate administration and control or evaluation of psychological tests.</p>	<p>Revoke access and remove subject from PA; and</p> <p>Deny Access</p>	<p>(Enter site-specific, graded time period)</p>	<p>(Site-specific)</p>	<p>Loggable(if individual subsequently receives a proper security clearance).</p> <p>One-hour Reportable (if individual subsequently denied a security clearance).</p>
3	<p>Properly authorized clearance (temporary or full) but, information subsequently obtained which requires denial of clearance (see A & B below).</p> <p>A. Clearance not denied after subsequent information obtained (i.e. access authorization personnel fail to properly deny access).</p> <p>B. Clearance denied based on personal deception and evidence the individual performed actions in an attempt to</p>	<p>Immediately inactivate security badge and remove subject from the Protected Area.</p>	<p>(Enter site-specific, graded time period)</p>	<p>(Site-specific)</p>	<p>A. One-hour Reportable</p> <p>B. One-hour Reportable</p> <p>C. Loggable</p>

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Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
	<p>commit or cause events identified in 10CFR Part 73, Appendix G(1)(a) & (d)</p> <p>C. Clearance denied based on personal deception and no evidence the individual performed actions in an attempt to commit or cause events identified in 10CFR Part 73, Appendix G(1)(a) & (d)</p>				
4	<p>Any failure, degradation, or discovered vulnerability in a safeguards system that could have allowed unauthorized or undetected access to a Protected Area or Vital Area had compensatory measures not been established.</p>	<p>(Enter site-specific compensatory measures or actions)</p>	<p>(Enter site-specific, graded time period)</p>	<p>(Site-specific)</p>	<p>Loggable</p>
5	<p>A. Sale, use, possession or introduction of illegal drugs or alcohol within the protected area.</p> <p>NOTE: Any discovery of an illegal drug or alcohol within the PA infers possession and is reportable in accordance with 10 CFR Part 26.73.</p> <p>B. Attempted introduction of an illegal drug or alcohol into the PA i.e. discovered at the search portal prior to actual PA entry:</p> <p>B.1. By a licensed operator or any supervisor.</p> <p>B. 2. By personnel with unescorted access other than a licensed operator or supervisor (note this includes contractor supervision).</p>	<p>Immediately inactivate security badge and remove subject from the Protected Area; and</p> <p>Control item and notify LLEA if an illegal drug.</p>	<p>(There are no compensatory measures for this event).</p>	<p>A. (Site-specific)</p> <p>B.1. (Site-specific)</p> <p>B.2. Security Event Log and Semi annual FFD report</p>	<p>A. 24-Hour Reportable</p> <p>B.1. 24-Hour Reportable</p> <p>B.2. Loggable</p>

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ATTACHMENT 2 – Access Control, Access Authorization & FFD

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
6	<p>Licensed operators or any FFD trained supervisory personnel (to include personnel reporting to the Emergency Operating Facility or Technical Support Center) involved in:</p> <p>A. Sale, use, or possession of illegal drug within the Protected Area</p> <p>B. Sale, use, or possession of a controlled substance off site</p> <p>C. Confirmed positive tests</p> <p>D. Use of alcohol within the Protected Area</p> <p>E. Determination of unfitness for scheduled work due to the consumption of alcohol.</p> <p>NOTE: Notification is made to the NRC Operations Center within 24 hours of discovery of the event by the licensee. Fitness for Duty events <i>SHALL</i> be reported under 10CFR26 rather than 10CFR73.71.</p>	<p>Immediately inactivate security badge and remove subject from the Protected Area; and</p> <p>Control item and notify I.I.F.A</p>	<p>(There are no compensatory measures for this event).</p>	<p>Security Event Log; and Semi-annual FFD report</p>	<p>A. 24-hour reportable</p> <p>B. 24-hour reportable</p> <p>C. 24-hour reportable</p> <p>D. 24-hour reportable</p> <p>F. 24-hour reportable</p>
7	<p>Employee is called into non-scheduled work and informs security or the supervisor or security prior to entering the protected area that they have been drinking and they test positive for alcohol, no report or loggable event is required.</p> <p>If employee does not disclose they have been drinking and tests positive for alcohol, follow Row 6 Above.</p>	<p>If positive, prevent access to PA and place badge on ADMIN hold; and</p> <p>Deny access to PA - deprogram security badge.</p>	<p>Prior to PA Access</p>	<p>None</p>	<p>None</p>

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ATTACHMENT 2 – Access Control, Access Authorization & FFD

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
8	Discovery of a criminal act involving a person granted unescorted access if the act has the potential for adversely affecting the public health and safety.	Deny access to PA - deprogram security badge.	Prior to PA Access	Security Event Log LER	1-hour

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ATTACHMENT 3 – Isolation Zones

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	* Discovery of an apparatus or implement in or near the isolation zone and capable of movement or extension through the zone and over the Protected Area fence/barrier	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
2	* Discovery of an apparatus or implement within the isolation zone and extended across the PA fence or barrier	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	* Excavations, objects or other encroachments discovered in the zone that could conceal a person	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None

* Without prior notice

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ATTACHMENT 4 - Perimeter Intrusion Detection System (PIDS)

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Failure to detect: 1. PIDS alarms.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Accumulation of false or nuisance alarms (FAR/NAR) reducing system reliability	(Enter site-specific compensatory measures or actions)	As specified in the site security procedures.	(Site-specific)	Loggable

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ATTACHMENT 5 - Protected Area Fence

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Fence fabric loose, sagging, top wire broken, and missing or improper angle.	(Enter site-specific compensatory measures or actions)	Upon discovery.	(Site-specific)	None
2	Washouts, penetrations, or excavations under or through the fence which are 96 sq. in. or greater at a single point or capable of lifting the fence fabric	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Discovery that a degradation could have allowed for unauthorized or undetected access	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 6 - Protected Area Barrier - (Excluding Fence)					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of a penetration equal to or greater than 96 sq. in. which is under a barrier or eighteen (18) feet or less above ground level.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Discovery of implement, equipment or material attached to or along building barriers which are capable of reaching down to within 18 feet of ground level or which are capable of reaching up to within 18 feet of the roof level.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	(If applicable to the site): Discovered material degradation, penetrations, cracks in the window glass, etc. or failure to form a barrier from the floor to a solid ceiling of the partition wall of the Security Building between the exit and entrance corridors.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None

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ATTACHMENT 7 - Protected Area Gates

Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequences	
1	Failure of electrical functions, controls, operation, etc., associated with a vehicle gate.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
2	Discovery of a failed lock or locking device	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 8 – Protected Area Doors and Hatches

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of one or more exit turnstiles ajar or loss of locking capabilities that would allow entry into the PA.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Discovery of a PA barrier door, hatch or entrance turnstile(s) ajar or loss of locking capabilities while retaining alarm functions. (if applicable)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Discovery of loss of alarm capabilities (e.g., intrusion, entrance, supervisory) associated with a PA door or hatch while retaining locking.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Discovery of door hinges to outside of PA not tack welded, deterioration of door or hatch material or frames, cracks in door glass.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
5	Discovery of man ways, drains, etc. within the PA and leading outside the PA that are 96 sq. in. or greater improperly secured.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 9 - Search Equipment

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Walk through metal detector or EVD fails -- prior to personnel making PA entry.	(Enter site-specific compensatory measures or actions – for all Attachments).	Immediately	(Site-specific)	None
2	Walk through metal detector or EVD fails test.	(Enter site-specific compensatory measures or actions)	Immediately	(Site-specific)	Loggable
3	Failure of portable metal detectors -- prior to allowing entry of personnel through the equipment	(Enter site-specific compensatory measures or actions)	Per site procedures	(Site-specific)	None.
4	Spurious alarms, faults or erroneous indications from metal detector or EVD units -- prior to searching of any person by use of the equipment	(Enter site-specific compensatory measures or actions)	Immediately	(Site-specific)	None
5	X-ray unit fails or unable to properly x-ray an object -- prior to allowing possession of the object by personnel other than security and prior to PA entry	(Enter site-specific compensatory measures or actions)	Immediately	(Site-specific)	None
6	Failed x-ray test prior to PA entry.	(Enter site-specific compensatory measures or actions)	Immediately	(Site-specific)	None
7	(If applicable to the site) Personnel fail to pause momentarily in the walk through metal detector with both feet firmly on the walkway, where required.	(Enter site-specific compensatory measures or actions)	Prior to PA entry	(Site-specific)	None
8	Lane Search Duress Alarm out of service	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 10 - Closed Circuit Television System (CCTV)

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Loss of a single CCTV camera or one or more cameras covering a single PIDS zone	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Loss of alternate PTZ. (used as a compensatory measure).	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Loss of CCTV coverage due to environmental conditions (i.e. sun glare, limited fog, ice/sleet/snow, etc.)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Loss of the CCTV capability.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
5	(If applicable to the site) Loss of camera in Security Building	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
6	Loss of all or part of the Video Capture System	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
7	Loss of all or part of CCTV alarm call up function.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 11 - Illumination

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Unable to assess movement of the patrolling SFM image -- physically or via CCTV.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Momentary loss of PA lighting (less than 10-minutes) due to mechanical or environmental conditions.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None

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ATTACHMENT 12 - Security Area Barriers

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of an improperly secured penetration equal to or greater than 96 sq. in. Improperly secured would be, though not limited to: 1. Fastening with material or technique which allows removal by hand or readily available tools	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Determination that unauthorized or undetected access could have occurred due to 96 square inches or greater penetration	(Enter site-specific compensatory measures or actions)	Immediately following determination	(Site-specific)	Loggable

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ATTACHMENT 13 - Security Area (SA) Doors, Windows, Hatches					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of a *SA barrier door(s) or hatch with loss of all alarm function.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
2	Discovery of a *SA barrier door or hatch with loss of locking capabilities. SA door is found unsecured, alarm is verified and door is re-locked.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
3	Discovery of a *SA barrier door or hatch with loss of locking.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Discovery of loss of locking and all alarm functions	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
5	(If applicable to the site) Discovery of a window in a *SA barrier or door without polycarbonate material	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable equated with penetration improperly secured equal to or greater than 96 sq. in.

* applicable only if SA (security area) doors are applicable to the site.

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ATTACHMENT 14 - Vital Area Barriers and Bullet Resistance Criteria

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	<p>Discovery of an improperly secured penetration equal to or greater than 96 sq. inches with the smallest dimension is equal to or greater than 6-inches.</p> <p>Improperly secured would be, though not limited to:</p> <ol style="list-style-type: none"> 1. Fastening with material or technique which allows removal by hand or readily available tools 	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Discovery of a penetration equal to or greater than 96 sq. in. with the smallest dimension equal to or greater than 6 in.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	<p>Discovery of a penetration equal to or greater than 96 sq. in. that provides a circuitous path to VA such as:</p> <ol style="list-style-type: none"> 1. Heating/ventilation/air conditioning duct 2. Cable tray penetrations 3. Piping penetrations 4. Ventilation fans or louvers, etc. 	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	<p>None if delay time is equal or greater than the surrounding barrier.</p> <p>Loggable if delay time is less than the surrounding barrier delay time.</p>
4	Discovered deterioration, removal or compromise of required bullet resistant material	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
5	Discovery that a single or multiple degradations could have allowed unauthorized or undetected access	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 15 – Vital Area Doors, Windows, Hatches

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovered loss of intrusion or tamper alarm or locking functions	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Discovery of a door ajar (unattended)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	(If applicable to the site): VA door exceeds false alarm criteria established in the site Security Plan: VA door still has locking and alarming capabilities.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Discovered lack of exterior pick plate, door hinges to outside of VA and not tack welded, deterioration of door or hatch material or frames	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 16 - Card Readers					
	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of one or all Hand Geometry Unit (HGU) failure(s)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Failure of an entrance or exit card reader on a VA personnel portal if both locked and alarmed capabilities are lost.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Card reader failure causes loss of locking or loss of alarms on a VA door.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Loss of tamper indication.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 17 - Central and Secondary Alarm Stations (CAS/SAS)

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Security Force Member is inattentive to duty (i.e. sleeping, ill, etc.)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Loss of alarm screen (left CRT), keyboard or mouse, AND no other system is available	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Loss of Graphics Screen	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
4	Complete loss of a single alarm station	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
5	Complete loss of power to both alarm stations that affects all equipment	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
6	Discovery that undetected or unauthorized access could have occurred	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 18 - Computers

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Loss of CRT monitors or keyboard functions associated with the computer IF no other backup system is available	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Receipt of numerous alarms, due to a mechanical, software or environmental conditions for which there is extended delay in alarm identification	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	One computer fails and the backup takes over	(Enter site-specific compensatory measures or actions)	Immediately upon discovery	(Site-specific)	None
4	Printer fails	(Enter site-specific compensatory measures or actions)	As soon as practical	(Site-specific)	None
5	Failure to receive an audible alarm with no backup indication	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
6	Prime computer fails and the back up computer fails to takeover. Total computer failure.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
7	Loss of both communication lines with both CPUs	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 19 – Intelligent Multiplexers (IMUX)

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Indications of a MUX failure in part or whole <i>NOTE: If after further investigation, reveals all alarms are associated with a independent IMUX, institute compensatory measures accordingly</i>	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 20 - Power Supply					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Loss of power in CAS or SAS. Associated losses: 1. CAS base radio 2. CCTV monitors in both CAS and SAS	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Loss of power to the security inverter <u>without</u> backup.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Loss of power to the security inverter <u>with</u> backup.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
4	Backup power supply not available beyond maximum time as specified in security Plan.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
5	If applicable to the site: Loss of the back up Security diesel power that exceeds maximum time specified in the security plan.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 21 - Communications					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Loss of alarm or locking functions to the main telephone switching equipment room.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
2	Loss of both of the security base radios	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Loss of all telephone lines.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Unauthorized removal from site or loss of a security portable radio off site.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None
5	Complete loss of offsite radio and telephone communications	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One hour report to be made following restoration of telephone capability should the ENS also be out of service

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ATTACHMENT 22 - Tampering, Line Supervision, Sabotage and Other Suspicious Activities or Criminal Acts (SEE "*" AT END OF ATTACHMENT-22)					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Assault on Plant Facility	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
2	Confirmed intrusions by unauthorized individuals (not tailgating or invalid levels)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
3	<p>Criminal acts within the Protected Area by an individual with unescorted access adversely affecting licensed activities or facility operations.</p> <ul style="list-style-type: none"> - Conspiracy to bomb plant - Deliberate tampering, vandalism or malicious mischief to vital equipment - NOTE: for criminal acts involving illegal drugs or acts committed by a licensed operator or supervisor, see Attachment 2). 	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable

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4	<p>Criminal act off-site by an individual with unescorted access adversely affecting public health and safety (Potential for affecting radiological safety of licensed activities):</p> <p>B. Actual or attempted introduction of Contraband into the PA or VA. (See Attachment-28, Row-5)</p>	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	<p>A. One-hour Reportable</p> <p>B. Loggable</p>
5	Confirmed tampering, vandalism or malicious mischief with safety or security equipment or any associated system, component or equipment.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
6	Loss of ability to monitor tamper or supervision associated alarms (tamper indication WITHOUT evidence of actual tampering).	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
7	Discovery of sabotage devices, evidence of tampering or unauthorized personnel	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
8	Fire or explosion of suspicious or unknown origin (within Protected Area or Isolation Zone).	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable

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9	Any other threatened, attempted, or committed act not previously defined in 10CFR73 Appendix G with the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan or the actual condition of such reduction in effectiveness.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
10	Bomb or extortion threat	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
11	If threat is one of a pattern of harassing threats even if unsubstantiated	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
12	Actual bomb discovery	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
13	Results of bomb search	(Enter site-specific compensatory measures or actions)	Call NRC back within 1-hour (with search results)	(Site-specific)	N/A
14	Mass demonstration at Plant Site that may pose a threat to the facility	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
15	Civil disturbance near Plant Site that may pose a threat to the facility	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable

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<p>16</p>	<p>Suspicious Aircraft</p> <p>“Suspicious aircraft” is defined as:</p> <ul style="list-style-type: none"> • Loitering or circling the site/plant. • Repeated flyovers. • Any unusual flight paths near the site, (e.g. aircraft flies low to the ground). <p>NOTE: if an official source (e.g., FAA, NORAD, NRC) notifies site of an impending or imminent <i>aircraft threat</i>, EXIT this procedure and execute the appropriate site emergency and contingency procedures.</p>	<p><u>Actions:</u></p> <p>1. Attempt to get aircraft registration number (tail number), physical description of aircraft, observed flight activity, time of day, approximate altitude and direction of flight path.</p> <p>2. Immediately notify the following, in the order listed:</p> <ul style="list-style-type: none"> a. FAA Air Traffic. b. Local FBI contact. c. LLEA. d. NRC Operations Center at (301) 816-5100. e. Site Security Management. f. Hudson Command Post at: (715) 377-3353. 	<p>N/A</p>	<p>(Site-specific)</p>	<p>*None (if there is no apparent malevolence resulting from the suspicious event).</p>
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17	<p>Suspicious Individuals or Vehicles</p> <p>“Suspicious Individuals or vehicles” is defined as:</p> <ul style="list-style-type: none"> a. OCA trespasser. b. Individual(s) requesting or inquiring about “tours.” c. Individual(s) observed surveilling or loitering near OCA boundary. d. Individuals observed taking photographs anywhere on or near site property. e. Vehicles observed circling or loitering near OCA boundary. f. Any other suspicious activities. 	<p><u>Actions:</u></p> <p>1. If individual(s) are trespassing, follow site procedures (e.g., confront, detain and question). If individual(s) are not trespassing, keep them under observation and execute appropriate preventive measures in accordance with site procedures.</p> <p>2. Whether the individual(s) is trespassing or not, notify the following, in the order listed:</p> <ul style="list-style-type: none"> a. LLEA. b. Local FBI contact. c. NRC Operations Center at (301) 816-5100. d. Site Security Management. e. Hudson Command Post at: (715) 377-3353. 	N/A	(Site-specific)	<p>*None (if there is no apparent malevolence resulting from the suspicious event).</p>
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* A call to the NRC about a suspicious activity does not require a 4-hour report, as would be required under 10CFR50.72(b)(2)(xi). However, if it is later determined the suspicious activity involved malevolence (deception, or activities that may threaten the health and safety of the public or on-site personnel, or protection of the environment), Site Operations should consider notifying the NRC via 4-hour report in accordance with 10CFR50.72(b)(2)(xi).

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ATTACHMENT 23 - Security Key Cards					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Individual <u>enters</u> the PA or a VA improperly: 1. Tailgates through a door without using card readers 2. Uses card reader improperly while card reader is processing another individual	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable <u>when</u> inadvertent and no malevolent intent One-hour Reportable if there was malevolent intent.
2	Individual <u>enters</u> a VA to which they are authorized by inadvertently using a key card of another individual who has the same VA access	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Individual authorized access receives or uses a key card of another person.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable (If PA access made) None (If individual does not enter PA.

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4	Discovery of a lost or uncontrolled security key card within the P.A.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	<p>None (<u>when</u> properly compensated and it was for a short duration [less than 10 min.] and it was determined there would be no opportunity to use).</p> <p>Loggable (<u>when</u> properly compensated and it is determined that there was an opportunity to use).</p> <p>One-hour Reportable (<u>when</u> properly compensated and it is determined the key card was used with malevolent intent during the time it was lost or uncontrolled).</p>
5	If applicable to the site: discovery of a lost or uncontrolled Security Key Card outside the PA.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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6	Failure to deactivate a key card prior to or at the time of termination of an individual for: 1. Lack of trustworthiness 2. Unreliability 3. Inadequate work performance	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None (<u>when</u> no use). One-hour Reportable (<u>when</u> used by anyone after a termination).
7	Discovery of a visitor within the PA who is not properly controlled by an escort.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 24 - Keys and Locks

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of a lost or missing key (PA or VA barrier door or padlock), or removal of such key from the OCA.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	None <u>when</u> properly compensated and determined there would be no opportunity to use Loggable <u>when</u> properly compensated and it is determined that there was an opportunity for misuse One-hour Reportable <u>when</u> it is determined the key was used during the time it was lost or uncontrolled and unauthorized or unescorted access could have occurred
2	Discovery of a compromised combination for a safeguards padlock	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Discovery of uncontrolled access to unused keys, cores, locks, by unauthorized personnel	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 25 – Manning, Performance and Response

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	<p>Less than security plan prescribed SFMs available for ANY of the below positions:</p> <ul style="list-style-type: none"> a. Response team. b. CAS or SAS. c. Compensatory coverage post 	<p>(Enter site-specific compensatory measures or actions)</p>	<p>Prior to allowing any on shift personnel to leave site.</p> <p>NOTE: <i>Personnel should only be allowed to leave <u>when</u> relieved from their post by oncoming personnel.</i></p> <p>NOTE: <i>Personnel held over more than 12 consecutive hours require a FFD evaluation.</i></p>	<p>(Site-specific)</p>	<p>Loggable (if compensated for within timeframe specified in the Security Plan).</p>
2	<p>Failed compensatory measure caused by inattentive or sleeping SFM.</p>	<p>(Enter site-specific compensatory measures or actions)</p>	<p>(Enter site-specific, graded time period)</p>	<p>(Site-specific)</p>	<p>Loggable (If ineffective because of drugs/alcohol the degradation is logged under 10 CFR 73.71.</p> <p>Positive results of a for cause test to be included in data submitted under 10 CFR 26.71(d).</p>

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ATTACHMENT 25 – Manning, Performance and Response

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
3	Potential or actual strike or walkout by the Security Force	(Enter site-specific compensatory measures or actions)	Prior to strike or walkout	(Site-specific)	Loggable <u>when</u> pre-compensated Advise Regional NRC <u>when</u> : 1. Potential exists 2. Actual 3. Return to normal
4	Response to an alarm is greater than what is committed to in the Security Plan/procedures.	(Enter site-specific compensatory measures or actions)	Immediately upon discovery.	(Site-specific)	Loggable
5	Loss of security weapon at site, and weapon is <u>retrieved within one-hour</u> of discovery of its loss.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
6	Loss of security weapon at site, and weapon is <u>NOT</u> retrieved within one-hour of discovery of its loss.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour reportable
7	Actual or imminent (within 3-days) security force strike and no additional personnel are available to maintain minimum requirements.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
8	Actual or imminent (within 3-days) security force strike additional security officers or a contingency force consisting of <u>trained Management, Supervisory or Operations Personnel</u> are available within the security plan/procedures prescribed time, AND this number is sufficient to meet security plan commitments.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 26 - Safeguards Information

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Any compromise of significant safeguards information (including loss or theft). A. This information would significantly assist a person in an act or radiological sabotage or theft of SSNM B. The information could not significantly assist an individual in gaining unauthorized or undetected access or would not significantly assist an act of radiological sabotage	<ul style="list-style-type: none"> - Try to locate - Ensure measures to preclude repeat - Minimize consequences 	(Enter site-specific, graded time period)	(Site-specific)	A. One-hour Reportable B. Loggable
2	Safeguards Information left unattended by a Safeguards Information qualified individual and Safeguards Information was NOT compromised	<ul style="list-style-type: none"> - Properly secure and control Safeguards Information. - Counsel appropriate individual(s) on the proper control and/or storage of Safeguards Information 	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Safeguards Information found improperly stored and/or inconspicuously marked.	<ul style="list-style-type: none"> - Determine that Safeguards Information was NOT compromised - Properly secure and/or conspicuously mark as <u>SAFEGUARDS INFORMATIONS</u> 	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 27 - Vehicles

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of ignition keys in an unattended vehicle within the PA	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
2	Discovery of Licensee or designated vehicle in the PA being operated by a <u>visitor</u> without a security escort.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
3	Discovery of a non-licensee or non-designated vehicle in the PA being operated without a security escort.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable

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ATTACHMENT 28 - Incoming Packages and Materials

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of improperly searched packages or deliveries within the PA	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable One-hour Reportable if found to be contraband that could be used as a weapon.
2	A. Actual or attempted introduction or possession of unauthorized weapons, explosives or incendiary devices within the Protected Area that constitutes a threat or attempted threat. B. If it does not constitute a significant threat (i.e., a few bullets).	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	A. One-hour Reportable B. Loggable
3	Discovery of unauthorized weapons, explosives or incendiary devices when search conducted prior to entry to Protected Area (Without any apparent malevolent intent).	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Discovery of unauthorized weapons, explosives or incendiary devices when search conducted prior to entry to Protected Area. (With malevolent intent)	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour reportable

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ATTACHMENT 29 - Vehicle Barrier System (VBS)

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Discovery of degraded passive barrier, regardless of the integrity of the VBS, i.e. 1 or 2 pins removed, minor cracks in concrete.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable if no malevolent intent. One (1) hour if malevolent intent.
2	Discovery of a degraded active barrier, regardless of the integrity of the VBS, i.e. gate does not function properly, pin does not engage.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable if no malevolent intent. One (1) hour if malevolent intent.
3	Design flaw or vulnerability in the Vehicle Barrier System.	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	•Loggable •Notify NRC Region if exceeds 30-days.

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ATTACHMENT 30 – Special Nuclear Material & Spent Nuclear Fuel

Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Assault on SSNM (transport) (See below "NOTE")	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
2	Theft or loss of classified documents pertaining to transport safeguards (See below "NOTE")	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
3	Loss of intra-convoy communications ability but ability to communicate with movement control center remains (See below "NOTE")	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	Loggable
4	Mechanical breakdown of transport vehicle carrying SSNM (See below "NOTE")	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
5	Suspicious vehicle following licensed carrier of SSNM determined to be a threat (See below "NOTE")	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
6	Theft or unlawful diversion of special nuclear material or spent fuel	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable
7	Theft, loss or diversion of SSNM discovered in transit to or from the NMC facility	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable

NOTE: NMC Facilities do not possess strategic Special Nuclear Material (SSNM).

ATTACHMENT 31 – Suspension of Safeguards					
Row	Event Description	Compensatory Measures or Actions	Acceptable Time Frame to Institute Compensation	Required Documentation	Reportability Consequence
1	Suspension of safeguards controls for actual emergencies	(Enter site-specific compensatory measures or actions)	(Enter site-specific, graded time period)	(Site-specific)	One-hour Reportable