

### OPERATING REACTOR SECURITY ASSESSMENT PROGRAM

#### 0320-01 PURPOSE

01.01 The Reactor Oversight Process (ROP) integrates the NRC's inspection, assessment, and enforcement programs. As part of the ROP, the Operating Reactor Security Assessment Program evaluates performance of operating commercial nuclear power reactor licensees in implementing their security programs and communicates the results to licensee managers, NRC managers, and certain other stakeholders.

01.02 The assessment program collects information from inspections and performance indicators (PIs) to enable the agency to arrive at objective conclusions about the licensee's performance in security. Based on this assessment information, the NRC determines the appropriate level of agency response, including supplemental inspection and pertinent regulatory actions ranging from management meetings to orders for plant shutdown. The assessment information and agency response are then communicated to the licensee and to certain external stakeholders with the need to know the information. Followup agency actions, as applicable, are conducted to ensure that the licensee's corrective actions for performance weaknesses were effective.

01.03 This Inspection Manual Chapter (IMC) describes the relation of security assessment to the ROP, the processes common to both assessment programs, and processes and procedures for specifically assessing the security of operating nuclear power reactors. The security assessment process is part of the ROP, but security is assessed and reported separately from other ROP areas to keep adversaries from obtaining information that could be useful to them.

#### 0320-02 OBJECTIVES

02.01 To collect information from inspection findings and PIs.

02.02 To arrive at an objective assessment of licensee security performance using PIs and inspection findings.

02.03 To assist NRC management in making timely and predictable decisions regarding appropriate agency actions used to oversee, inspect, and assess licensee performance.

02.04 To provide a method for informing certain stakeholders and obtaining their feedback on the NRC's assessment of licensee performance in security.

02.05 To provide a process to follow up on areas of concern.

### 0320-03 APPLICABILITY

This IMC applies to all operating commercial nuclear reactors, except those under IMC 0350, "Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance Or Operational Concerns." Nothing in this manual chapter prohibits the NRC from taking any necessary actions to fulfill its responsibilities under the Atomic Energy Act of 1954, as amended.

This IMC specifically supplements the guidance in IMC 0305, "Operating Reactor Assessment Program," for the security cornerstone. If this chapter is silent on a topic, then the guidance in IMC 0305 should be followed.

### 0320-04 DEFINITIONS

The definitions in IMC 0305 apply to this chapter, with one exception. The phrase "multiple degraded cornerstones" does not apply to the assessment of the security cornerstone. The following definition is in addition to the definitions in IMC 0305.

04.01 Significant Inspection Finding|Performance Indicator. An inspection finding with a significance greater than green (as determined by the physical protection significance determination process) or a security performance indicator that is greater than green.

### 0320-05 RESPONSIBILITIES AND AUTHORITIES

The following responsibilities are in addition to those listed in IMC 0305.

05.01 Deputy Executive Director for Reactor and Preparedness Programs (DEDR). Approves deviations from the security action matrix.

05.02 Director, Office of Nuclear Security and Incident Response (NSIR)

- a. Implements the requirements of this inspection manual chapter within NSIR.
- b. Develops policies and procedures for the security assessment program.
- c. Ensures uniform program implementation and effectiveness.
- d. Concurs in regional requests to deviate from the security action matrix.

05.03 Director, Division of Security Operations (DSO), NSIR |

- a. Oversees implementation of the requirements in this chapter and ensures consistent implementation across the regions.
- b. Recommends, develops, and implements improvements to the Operating Reactor Security Assessment Program.

05.04 Deputy Director for Security Oversight, DSO, NSIR |

- a. Develops assessment program guidance.
- b. Collects feedback from the regional offices and assesses execution of the Operating Reactor Security Assessment Program to ensure consistent application.
- c. Provides oversight of the mid-cycle and end-of-cycle review meetings.
- d. Concurs on proposals by the regional office to extend an inspection finding in the assessment process beyond the normal four quarters in accordance with IMC 0305, Section 06.06.d.
- e. Concurs on proposals by the regional office to initiate a parallel inspection finding in accordance with IMC 0305, Section 06.06.d.
- f. Concurs on the supplemental inspection plan for plants in the Repetitive Degraded Cornerstone column of the security action matrix. |

05.05 Regional Administrators

- a. Conduct assessment reviews and direct allocation of security inspection resources within the regional offices based on the security action matrix and other program guidance.
- b. Assure that annual discussions of security performance with licensees are conducted in nonpublic meetings.

05.06 Regional Directors of Division of Reactor Safety

- a. Approve proposals by the regional office to extend a security inspection finding in the assessment process beyond the normal four quarters in accordance with IMC 0305, Section 06.06.d.
- b. Approve proposals by the regional office to initiate a parallel inspection finding in accordance with IMC 0305, Section 06.06.d.
- c. Approve the supplemental inspection plan for plants in the Repetitive Degraded Cornerstone column of the security action matrix. |

06.01 Overall Assessment Process. Security performance is reviewed over a 12-month period, using the ROP's processes and schedules (IMC 0305, Exhibits 3 and 4). An overview of the security cornerstone with its key attributes and applicable inspectable areas is displayed on the diagram of Exhibit 1. The diagram shows that material control and accountability will be added as a new key attribute in a future revision to this inspection manual chapter.

A significant inspection finding is carried forward for four calendar quarters or until appropriate licensee corrective actions have been completed, whichever is longer. Therefore, an inspection finding will no longer be considered in the assessment process after four calendar quarters unless the region has justification to keep the finding open in accordance with IMC 0305, Section 06.06.d. Keeping active for assessment any force-on-force findings that are not closed by headquarters within 12 months (four quarters) of their issuance, requires the concurrence of Deputy Director for Security Oversight, DSO, NSIR as specified in Section 06.06a.3.

The inspectors normally use the SDP to evaluate inspection findings for significance. In addition, the NRC's enforcement policy may apply to issues which the SDP process can not evaluate for significance (e.g., violations that involve willfulness, including discrimination). These issues should be considered when determining the range of agency actions within the appropriate column of the security action matrix. Additionally, if applicable the underlying technical issue should be separately evaluated using the Physical Protection Significance Determination Process and the results considered in the assessment process.

06.02 Performance Reviews. The assessment process consists of a series of reviews that result in the issuance of various assessment letters. The content of security assessment letters should be below the level of safeguards information. Descriptions of security inspection findings or issues in the letters should be at the level used in the Reactor Program System—official use only. The security-related assessment actions for each review are described below.

- a. Continuous Review. The DRS branch chief responsible for security ensures the continuous review of security performance is accomplished. Any anticipated change in security performance indicators should be reported to the region's DRS branch chief responsible for security.

The region may issue a security assessment followup letter (Exhibit 3) to address a security issue, in accordance with the security action matrix, between the normal quarterly assessments if (1) a security significant inspection finding is finalized or (2) a performance indicator, based on current inputs, will cross a performance threshold at the end of the quarter. The security letters will be prepared, designated, and marked as "exempt from public disclosure in accordance with

10 CFR 2.390.”<sup>1</sup> The letters shall contain the same type of information required of similar ROP assessment letters.

- b. Quarterly Review. The quarterly review uses the PI data submitted by licensees and inspection findings compiled over the previous 12 months. This review is conducted within 5 weeks of the end of each quarter of the annual assessment cycle (see IMC 0305, Exhibit 4). Performance indicators and applicable inspection findings for the most recent quarter are considered in determining agency actions using the security action matrix (Exhibit 2).

The DRS branch chief responsible for security ensures that the most recently submitted PIs (which should be submitted no more than 21 days after the end of the quarter) and the inspection findings in the Reactor Program System (RPS) are reviewed to identify any performance trends in security. The branch chief shall use the security action matrix to help identify any NRC actions that should be considered that are not already included in the existing inspection plan. Assessment followup letters are normally issued by the DRS branch chief within 2 weeks of the quarterly review for any new significant PIs or inspection findings. The letter shall follow the guidance in Section 06.02a and conform to Exhibit 3.

On determining that a plant will be in the Repetitive Degraded Cornerstone column, the regional office should issue an assessment letter stating that the changes to the planned actions are consistent with the Repetitive Degraded Cornerstone column in the security action matrix.

- c. Mid-Cycle Review. The security cornerstone will be discussed during any regional assessment meetings to discuss performance in the other six cornerstones of safety. DRS members responsible for security will typically assemble the items needed for discussing security at the assessment meetings. The DRS branch chief responsible for security, or a designee, should attend the mid-cycle review meetings. The discussion of security should be at the official use only level unless the venue can support controlling safeguards information.

The output of this review is a mid-cycle letter that addresses the security cornerstone. The mid-cycle letters should follow the format in Exhibit 4. The mid-cycle review and subsequent mid-cycle letters should only discuss issues from inspections that were completed before the end of the mid-cycle assessment period. Additional activities include planning inspection activities for the next 15-month period, and discussing any insights into potential substantive cross-cutting issues (problem identification and resolution, human performance, and safety-conscious work environment). The security action matrix is used to determine the scope of agency actions in response to the assessment inputs. The mid-cycle review will be completed within 7 weeks of the end of the second quarter of the annual assessment cycle.

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<sup>1</sup>Security-related assessment letters should be treated as official use only documents described in Management Directive 12.6, “NRC Sensitive Unclassified Information Security Program,” with the exception of the markings.

The regional offices will develop a plant performance summary for plants with a degraded security cornerstone (two or more white inputs or 1 yellow input). If the meeting agenda (IMC 0305, Exhibit 6) or plant performance summary (IMC 0305, Exhibit 7) discuss security issues, the documents, as a minimum, should be clearly marked as “official use only” to ensure that the document is handled properly and not inadvertently released to the public. (See MD 12.6.)

The mid-cycle security letters shall be issued on the same schedule as the ROP letters. The security letters will be prepared, designated, and marked as “exempt from public disclosure in accordance with 10 CFR 2.390.” The letters shall contain the same type of information required of ROP assessment letters. The ROP assessment letters should contain a brief statement that the security assessment was completed and will be reported in a separate letter.

| An inspection plan of security activities, covering approximately 15 months from the issuance of the mid-cycle letter, will be included with the mid-cycle security letters. The inspection plan is report 24 from the RPS. The schedule for force-on-force exercises are not to be included unless first coordinated with the Security Performance Evaluations Section of NSIR.

- d. End-of-Cycle Review. The security cornerstone will be discussed along with the other ROP cornerstones during the regional office’s end-of-cycle review. Regional DRS members responsible for security will typically assemble the items needed for discussing security at the assessment meetings. The output of this review is a security assessment letter for each plant (Exhibits 5, 6, 7, 8, and 9). The end-of-cycle review and subsequent annual assessment letters should only discuss issues from inspections that were completed before the end of the assessment period. Additional activities include planning security inspection activities for the next 15-month period, discussing any potential substantive cross-cutting issues, and developing an input (if applicable) to support the Agency Action Review Meeting. The security assessments will follow the same schedule and guidance as the ROP assessments. The security action matrix will be used to determine the scope of agency actions in response to assessment inputs.

| The RPS listing of security inspection findings will accompany the Plant Issues Matrix (PIM) reports produced for the end-of-cycle assessments. The regional offices shall develop a plant performance summary (see IMC 0305, Exhibit 7) for those plants whose security performance has been in the Degraded Cornerstone column, Repetitive Degraded Cornerstone column, or Unacceptable Performance column of the security action matrix during any quarter of the previous 12 months. The content of the plant performance summaries will follow the guidance of IMC 0305 as it applies to the security performance being documented.

If the meeting agenda (IMC 0305, Exhibit 6) or plant performance summary (IMC 0305, Exhibit 7) discuss security issues, the documents shall, as a minimum, be clearly marked as “official use only” to ensure that the document is handled properly and not inadvertently released to the public. (See MD 12.6.)

The DRS branch chiefs responsible for security are expected to participate in their region's end-of-cycle review meetings. The discussions of security performance or issues should be kept at the official-use-only level. If safeguards information must be discussed, the necessary measures should be taken to protect the information.

The output of the end-of-cycle review is an annual security assessment letter for each facility (Exhibits 5, 6, 7, 8, and 9). The letters will be designated and marked as "exempt from public disclosure in accordance with 10 CFR 2.390." The letters shall be issued on the same schedule as the ROP assessment letters. The signature authority for each annual security assessment letter is determined by the most significant column of the security action matrix that the plant has been in over the four quarters of the assessment cycle. The letters shall contain the same type of information required of ROP assessment letters, and include a schedule of security inspections as discussed in 06.02c, above. The ROP assessment letters should contain a brief statement that the security assessment was completed and will be reported in a separate letter.

06.03 Program Reviews. Plants with significant performance weaknesses in security will be discussed at the Agency Action Review Meeting. Those are the plants that are in the Repetitive Degraded Cornerstone or Unacceptable Performance columns of the security action matrix.

06.04 Annual Meeting With Licensee. Performance in the security cornerstone will not be discussed during the public assessment meeting with licensees.<sup>2</sup> If the plant's performance in security is in the Licensee Response column of the security action matrix, then the licensee should be offered the opportunity to discuss their performance in a nonpublic meeting coincident to the public meeting. If the region's assessment places a plant's security performance beyond the Licensee Response column of the security action matrix, the region will schedule a closed meeting with the licensee to discuss the performance and agency actions. The meeting can be held the same day as the public annual meeting and be led by the same NRC attendees if the appropriate level of management is involved. The appropriate level of management is the level indicated on the Regulatory Performance Meeting row of the security action matrix.

If performance in the security cornerstone is significantly degraded (i.e., Degraded Cornerstone column in the security action matrix or worse) and performance of the other ROP cornerstones is in the Licensee Response or Regulatory Response column in the ROP action matrix, then a security performance meeting must be held with the licensee within 16 weeks of the annual security assessment letter if the public meeting is scheduled later, as is allowed by IMC 0305, Section 06.04.

The purpose of the meeting is to allow the licensee an opportunity to respond to the information in the annual security assessment letter and to ensure the licensee

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<sup>2</sup>The NRC's and industry's actions in security may be discussed in general at the public meeting, but should only include information that the agency has already made public on the topic.

| understands the basis for our assessment and planned actions. It is also an opportunity for the NRC to fully understand the licensee's position and corrective actions.

#### 06.05 NRC Responses to Licensee Performance

- a. Security Action Matrix. The security action matrix (Exhibit 2) is based on the ROP action matrix. Therefore, the security action matrix takes a graded approach to addressing performance issues. The terms in the IMC 0305 discussion of the ROP action matrix also apply to the security action matrix. The next two sections describe aspects of the security action matrix that differ from the ROP action matrix.
  1. Regulatory Performance Meetings. Such meetings to discuss security-related issues are not open to the public.
  2. Communication. Communication between the licensee and the NRC and between the NRC and external stakeholders uses a graded approach. For declining licensee performance, higher levels of agency management will review and sign the assessment letters and conduct the annual assessment meeting. Also for declining performance, the NRC's assessment letter will be sent to selected external stakeholders with a need to know the information.<sup>3</sup>
  
- b. Expected Responses for Each Action Matrix Column. The range of expected licensee and NRC actions in the security action matrix is similar to the range in the ROP action matrix. The following sections describe aspects of the security matrix that are specific to the security cornerstone.
  1. Regulatory Response Column. Assessment inputs result in no more than one white input; the cornerstone objective is met with minimal reduction in security performance. Regulatory performance meetings for security are not open to the public.
  2. Degraded Cornerstone Column. Assessment inputs result in multiple white inputs or 1 yellow input; the cornerstone objective is met with moderate degradation in security performance. Regulatory performance meetings for security are not open to the public.

A regulatory action that the region may consider in response to performance in this column is to stop announcing baseline and supplemental security inspections to the licensee. That is, an assessment letter sent to the licensee will not include the RPS report 24 inspection schedule for security, or specific security inspections would not be listed on report 24. In addition, the region needs to consider if a confirmatory action letter is warranted based on the collection of inputs that determined performance at this level.

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<sup>3</sup>Reference memo from Roy Zimmerman to regional administrators, subject "Providing State Officials Security Related Documents," dated April 19, 2005, ML050630069

Note: The confirmatory action letter (CAL) for this column of the action matrix is not mandatory, but the regional office should consider issuing a CAL when significant information on licensee performance becomes available.

3. Repetitive Degraded Cornerstone. Assessment inputs result in a repetitive degraded cornerstone (2 or more white inputs or a yellow input for five or more consecutive quarters), multiple yellow inputs, or a red input. If the only greater than green finding in the fifth quarter has been held open greater than four quarters, the repetitive degraded cornerstone does not apply. If, however, one of the greater than green findings is still within the original four quarters and one or more findings has been held open greater than four quarters, the repetitive degraded cornerstone does apply. In this instance, the plant would stay in the Repetitive Degraded Cornerstone column until there was only one greater than green finding, regardless of the length of time the findings have been opened. The inspection plan for supplemental Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input," must be approved by the Director, DRS, with the concurrence of the Director, DSO, NSIR.

After the supplemental inspection, the EDO or the EDO's designee, in conjunction with the regional administrator and the Director, NSIR, will decide whether additional agency actions are warranted. Regulatory performance meetings for security shall not be open to the public.

Note: Other than the CAL, the regulatory actions listed in this column of the action matrix are not mandatory. However, the regional office should consider each of these regulatory actions when significant new information on licensee performance becomes available.

4. Unacceptable Performance Column. Overall unacceptable performance; unacceptable margin for security.

Note: If the agency determines that a licensee's performance is unacceptable, a shutdown order may be issued.

06.06 Additional Action Matrix Guidance. The guidance in IMC 0305 applies to the security cornerstone and the security action matrix, with the following exceptions.

a. Approvals and Concurrences

1. Items in IMC 0305 requiring approval or concurrence by the Deputy Director, Division of Inspection and Regional Support, NRR, will require the approval or concurrence of the Deputy Director for Security Oversight, DSO, NSIR, for security-related issues.
2. Items in IMC 0305 requiring approval or concurrence by the Director, NRR, will require the approval or concurrence of the Director, NSIR, for security-related issues.
3. Extending security-related inspection findings for consideration in assessments beyond four calendar quarters will follow the same process specified in IMC 0305, Section 06.06.d. However, certain force-on-force findings are the responsibility of headquarters to close. Extending any of those findings needs to be coordinated with the Security Performance Evaluation Branch, DSO, NSIR, the approval of the regional Director, DRS, and the concurrence of the Deputy Director for Security Oversight, DSO, NSIR. The affected licensee will be notified by letter of any such extensions.

- b. Cross-cutting Aspects and Substantive Cross-Cutting Issues. During the course of their inspections, inspectors will use the provisions contained in IMC 0612 (section 06.03.c.(5) and Appendix F) and IMC 0305 (section 06.07) to identify any relevant cross-cutting aspects that are associated with their inspection findings. The cross-cutting aspects will be communicated to the licensee at the inspection exit meeting and within the inspection report as described in IMC 0612. Security inspection report transmittal letters will document the cross-cutting aspects, if any, as described in IMC 0612, Exhibit 4. During the ROP assessments, the regional consideration of cross-cutting aspects of findings in identifying the existence of substantive cross-cutting issues in the ROP cornerstones will also include the cross-cutting aspects of security findings.

Only the cross-cutting aspects of the security-related finding may be made publicly available. Making any other details of the security-related finding public requires prior approval of the Director, DSO, NSIR.

- c. Problem Identification and Resolution (PI&R) Inspections. The security cornerstone will continue to be considered along with the other six cornerstones for inclusion in the biannual PI&R team inspections conducted at each power reactor site. A security specialist may be added to the PI&R team as a full-time or part-time member. Any inspection results derived from security-related PI&R inspections will not be made public. The security-related inspection information may be included in (1) a nonpublic attachment to the team inspection report, (2) the next-issued security inspection report, or (3) a separate, nonpublic inspection report on the security-related findings. The publicly available PI&R inspection report should include a brief statement that the inspection included the security cornerstone.

- d. Deviations from the Security Action Matrix. In the rare instance when the regulatory action specified in the security action matrix is not appropriate for the issue, the region may request to deviate from the matrix. The request is made as specified in IMC 0305, section 06.06.f, with the following change. The request is to be made to the Deputy Director for Reactor and Preparedness Programs (DEDR) with the concurrence of the Director, NSIR.

Indeterminate losses of target sets during a force-on-force exercise that are evaluated with the Baseline Physical Protection Significance Determination Process and result in a green finding are not considered deviations from the action matrix.

END

EXHIBITS:

1. Overview of the Security Cornerstone
2. Security Cornerstone Action Matrix
3. Sample Security Cornerstone Assessment Followup Letter Based on Quarterly Review or Issuance of Final SDP Letter
4. Sample Security Cornerstone Mid-Cycle Letter
5. Sample Security Cornerstone Annual Security Assessment Letter for Plants in the Licensee Response Column During the Entire Assessment Cycle
6. Sample Security Cornerstone Annual Assessment Letter for Plants in the Licensee Response Band Column That Were in Other Action Matrix Columns During the Assessment Cycle
7. Sample Security Cornerstone Annual Assessment Letter for Plants in the Regulatory Response Column
8. Sample Security Cornerstone Annual Assessment Letter for Plants in the Degraded Cornerstone Column
9. Sample Security Cornerstone Annual Assessment Letter for Plants in the Repetitive Degraded Cornerstone Column

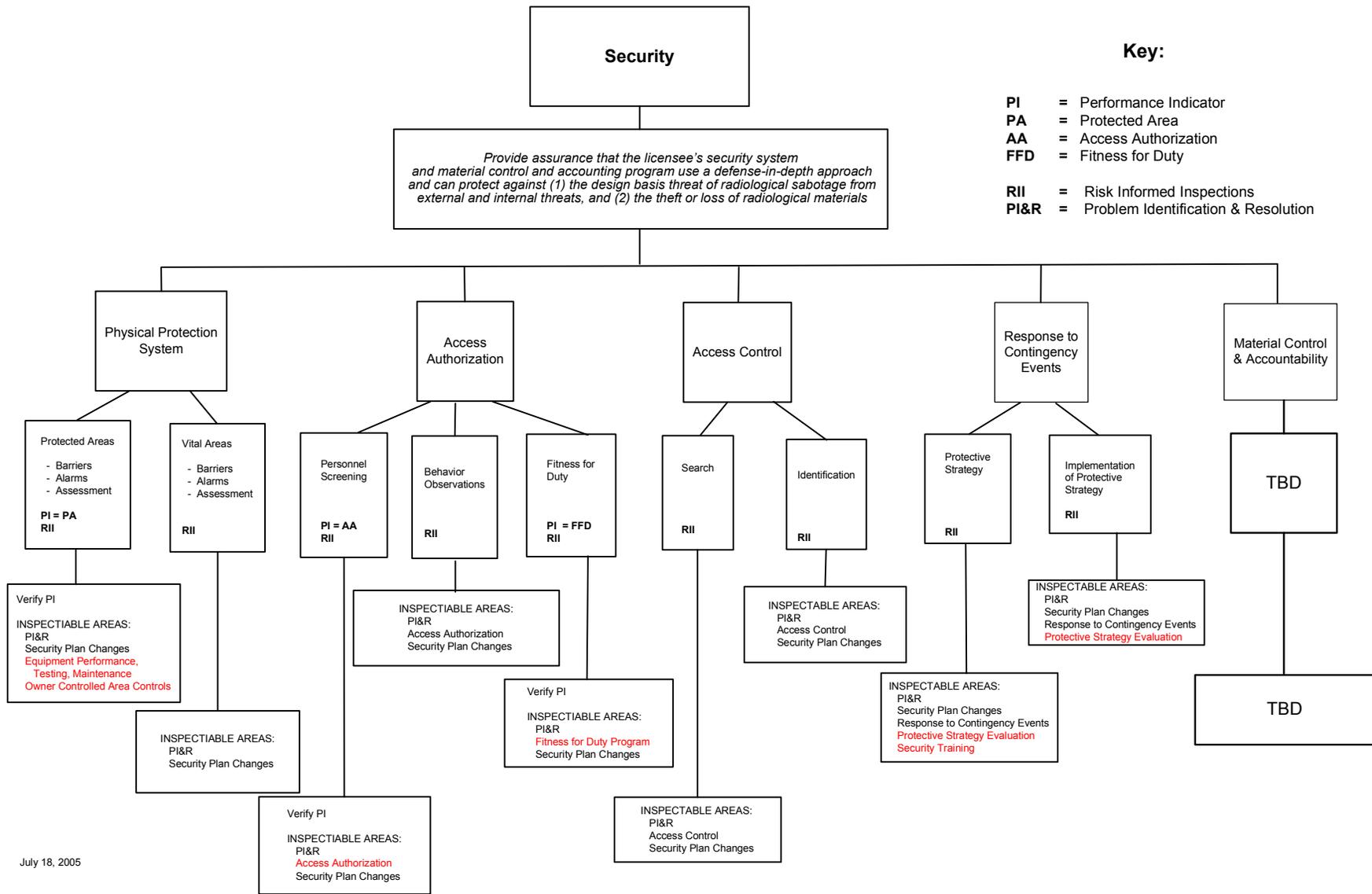
Attachment: Revision History for IMC 0320

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# EXHIBIT 1

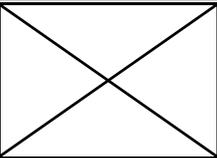
## Overview of the Security Cornerstone



July 18, 2005

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## EXHIBIT 2 Security Cornerstone Action Matrix

		Response Bands				
		Licensee Response	Regulatory Response	Degraded Cornerstone	Repetitive Degraded Cornerstone	Unacceptable Performance
RESULTS		All assessment inputs (performance indicators and inspection findings) green; cornerstone objectives fully met	One white input; cornerstone objective met with minimal reduction in security performance	Multiple white inputs or 1 yellow input; cornerstone objective met with moderate degradation in security performance	Multiple yellow inputs or 1 red input; cornerstone objective met with longstanding issues or significant degradation in security performance	Overall unacceptable performance; unacceptable margin for security
RESPONSE	Regulatory Performance Meeting	None	Branch chief (BC) or division director (DD) meets with licensee	DD or regional administrator (RA) meets with licensee	RA (or EDO) meets with senior licensee management	Commission meeting with senior licensee management
	Licensee Action	Licensee corrective action	Licensee root cause evaluation and corrective action with NRC oversight	Licensee cumulative root cause evaluation with NRC oversight	Licensee performance improvement plan with NRC oversight	
	NRC Inspection	Risk-informed baseline inspection program	Baseline and supplemental Inspection Procedure 95001	Baseline and supplemental Inspection Procedure 95002	Baseline and supplemental Inspection Procedure 95003	
	Regulatory Actions <sup>4</sup>	None	Supplemental inspection only	Supplemental inspection Consider: CAL; unannounced inspections	10 CFR 2.204 DFI 10 CFR 50.54(f) letter CAL/order	Order to modify, suspend, or revoke licensed activities
COMMUNICATION	Assessment Letters	BC or DD reviews, signs assessment report (w/inspection plan)	DD reviews, signs assessment report (w/inspection plan)	RA reviews, signs assessment report (w/inspection plan)	RA reviews, signs assessment report (w/inspection plan)	
	Annual Assessment Meeting	SRI or BC meets with licensee	BC or DD meets with licensee	RA (or designee) discusses performance with licensee	RA or EDO discusses performance with senior licensee management	
	External Stakeholders	None	State Governors	State Governors, DHS, Congress	State Governors, DHS, Congress	State Governors, DHS, Congress
	Commission Involvement	None	None	None	Plant discussed at AARM	Commission meeting with senior licensee management
INCREASING SIGNIFICANCE 						

<sup>4</sup>Other than a CAL, the regulatory actions for plants in the Repetitive Degraded Cornerstone column are not mandatory agency actions. However, the regional office should consider each of these regulatory actions when significant new information on licensee performance becomes available. In the Degraded Cornerstone column, a CAL is not mandatory and should only be considered if other performance information warrants a CAL.

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## Exhibit 3

### Sample Security Cornerstone Assessment Followup Letter Based on Quarterly Review or Issuance of Final SDP Letter

Licensee distribution designate  
Licensee name/address

SUBJECT: Assessment Followup Letter for Security—(Official Plant Name)

Dear (Mr./Ms. last name of addressee)

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

**[Use the following paragraph for documenting QUARTERLY REVIEW if the plant moved to a more significant column of the security action matrix]**

On **(date)** the NRC staff completed, as part of our **(continuous|quarterly)** review of security performance, our assessment of **(official plant name)**. The assessment evaluated performance indicators (PIs) and inspection results. The purpose of this letter is to inform you of your security performance during this period and our plans for future inspections at your facility. This letter supplements, but does not supercede, our latest annual or mid-cycle assessment letter issued on **(date of annual or mid-cycle assessment letter)**.

**[Use the following paragraphs, as appropriate.]**

1. Changing action matrix actions based on performance indicators

Our review of **(official plant name)** indicated that you have crossed the threshold from **(color)** to **(color)** for the **(name of performance indicator)** performance indicator. **[Provide additional details as necessary.]**

**[Briefly discuss other significant security performance indicators or inspection findings that will influence the level of supplemental inspection effort.]**

As a result, we assessed **(plant name)**'s performance to be in the **(Regulatory Response, Degraded Cornerstone, or Repetitive Degraded Cornerstone)** column of the NRC's security action matrix. We therefore plan to conduct supplemental Inspection Procedure **(95001, 95002, 95003)** during the week of **(date)**. **[If the performance is in the Degraded or Repetitive Degraded Cornerstone column and the inspection will be unannounced, then use the following sentence in lieu of the previous sentence.]** We therefore plan to conduct supplemental Inspection Procedure **(95001,95002, 95003)** in the near future. **[Add description of the objectives of the supplemental inspection procedure.]<sup>1</sup>**

2. Changing action matrix actions based on inspection findings

On **(date)**, the NRC staff forwarded a letter on the final significance determination of a **(white, yellow, red)** inspection finding in the security cornerstone. **[Provide additional details as necessary.]**

**[Briefly discuss other security-significant performance indicators or inspection findings that will influence the level of supplemental inspection effort.]**

As a result of our review, we have found **(plant name)**'s performance to be in the **(Regulatory Response, Degraded Cornerstone, or Repetitive Degraded Cornerstone)** column of the NRC's security action matrix. We therefore plan to conduct supplemental Inspection Procedure **(95001, 95002, 95003)** during the week of **(date)**. **[If the performance is in the Degraded or Repetitive Degraded Cornerstone column and the inspection will be unannounced, then use the following sentence in lieu of the previous sentence.]** We therefore plan to conduct supplemental Inspection Procedure **(95001, 95002, 95003)** in the near future. **[Add a description of the objectives of the supplemental inspection procedure.]**<sup>1</sup>

Please contact **(DRS branch chief)** at **(telephone number)** if you have any questions about this letter.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(Name)**, Director<sup>2</sup>  
Division of Reactor Safety

Docket Nos. 50-ABC, 50-XYZ  
License Nos. NPF-0, NPF-0

cc:  
Nonpublic cc list

Distribution:  
Nonpublic distribution list  
| Chief, NSIR/DSP/RSB  
| Chief, NSIR/DSO/RSOB  
| RidsNsirDso@nrc.gov  
|

Note 1: Summary of supplemental inspection objectives

IP 95001

To provide assurance that the root causes and contributing causes of significant performance issues are understood, the extent of condition is identified, and the corrective actions will prevent recurrence.

IP 95002

To provide assurance that the root and contributing causes for the individual and collective significant performance issues are understood, to independently assess the extent of condition, and to provide assurance that the corrective actions will prevent recurrence.

IP 95003

1. To provide additional information on whether the continued operation of the facility is acceptable and whether additional regulatory actions are necessary to arrest declining performance,
2. To provide an independent assessment of the extent of significant issues to help determine whether an unacceptable margin of safety exists.
3. To independently assess the adequacy of the programs and processes the licensee uses to identify, evaluate, and correct performance issues.
4. To independently evaluate the adequacy of programs and processes in the relevant strategic performance areas.
5. To provide insight into the overall root and contributing causes of identified performance deficiencies.

Note 2: See the security action matrix for the proper signature authority.

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## Exhibit 4

### Sample Security Cornerstone Mid-Cycle Letter

Licensee distribution designee  
Licensee name/address

SUBJECT: Mid-Cycle Security Performance Review and Inspection Plan—**(Official Plant Name)**

Dear **(Mr./Ms. last name of addressee)**

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

On **(date)**, the NRC staff completed its performance review of **(official plant name)** for the first half of the calendar year 200**(X)** assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results over the previous 12 months. The purpose of this letter is to inform you of our assessment of your security performance during this period and our plans for future security inspections at your facility so you can inform us of any planned inspections that may conflict with your plant activities.

**[Use one of the two paragraphs below as applicable, using the sentences that are appropriate for each plant’s situation.]**

**[1]** Plant performance for the most recent quarter was within the Licensee Response column of the NRC’s security action matrix on the basis that all inspection findings have very low security significance (Green) and all PIs show that no additional NRC oversight was required (Green). **[Add the following if needed.]** However, **(insert finding)** is still being reviewed under the physical protection significance determination process. When finalized, the finding may change our assessment of your plant’s security performance. **(Give additional details as necessary.)** Therefore, we will conduct only security baseline inspections at your facility through March 31, 200X. We will also conduct several non-ROP security inspections, which include **[insert appropriate inspections]**.

**[2]** Plant performance for the most recent quarter was within the **(Regulatory Response, Degraded Cornerstone, or Repetitive Degraded Cornerstone)** column of the NRC’s security action matrix for the following reasons. **[Enumerate the security-significant performance indicators and inspection findings and briefly discuss their significance]**.

**[Provide additional information as necessary, including current and proposed NRC and licensee actions. Do not provide detailed information on NRC or licensee actions already discussed in the previous annual assessment letter.]**

**[Add the following paragraph for any non-SDP Severity Level III or greater enforcement action taken from January 1–June 30, 200X, if applicable.]**

Additionally, on **(month day, year)**, the staff issued a Severity Level **(I, II, or III)** notice of violation in accordance with the NRC's Enforcement Policy. **[Provide additional details including followup actions as necessary. Do not provide detailed information on NRC or licensee actions already discussed in the previous end-of-cycle letter.]**

**[Add either of the following two paragraphs, as applicable.]**

The enclosed inspection plan lists the security inspections scheduled through March 31, 200X. **[The inspection schedule should be planned 18 months out from the date of issuance of the annual assessment letter. Also briefly mention infrequent inspections or inspections that are unusual to the plant, except force-on-force inspections, which will be announced by headquarters].** The inspection plan is provided to minimize disruptions to your staff and to allow scheduling conflicts and personnel availability issues to be resolved well before our inspectors arrive onsite. **[If some security inspections are unannounced, add the following sentence.]** Several of our planned inspections do not appear on the attached plan because they are being conducted as unannounced inspections in response to plant performance in the Repetitive Degraded Cornerstone column of the security action matrix. The inspections in the last 9 months of the inspection plan are tentative and the plan may be revised at the end-of-cycle review meeting. Routine force-on-force inspections are conducted approximately every 3 years. You will be notified by separate correspondence 8 to 10 weeks in advance of any force-on-force inspections scheduled for your facility.

Normally we would advise you of our planned security inspections for the next 18 months. However, we are not announcing our security inspections at **(plant name)** because the plant's performance in security is in the Repetitive Degraded Cornerstone column of the NRC's security action matrix. An inspection plan may be forthcoming with the next end-of-cycle security assessment letter.

If we change the inspection plan, we will contact you to discuss the change as soon as possible. Please contact **(DRS branch chief, me)** at **(telephone number)** if you have any questions about this letter.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(Name)**, Chief <sup>1</sup>  
**(Branch)**  
Division of Reactor Safety

Docket Nos. 50-ABC, 50-XYZ

License Nos. NPF-0, NPF-0

Enclosure: **(Plant name)** Inspection Plan **[if a plan is enclosed]**

cc.

Nonpublic cc list

Distribution:

Nonpublic distribution list

Chief, NSIR/DSP/RSB

Chief, NSIR/DSO/RSOB

[RidsNsirDso@nrc.gov](mailto:RidsNsirDso@nrc.gov)

Note 1: Refer to the security action matrix for the proper signature authority. Signature authority is determined by the most significant column of the action matrix that the plant has been in over the first two quarters of the assessment cycle.

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## Exhibit 5

### Sample Security Cornerstone Annual Assessment Letter for Plants in the Licensee Response Column During the Entire Assessment Cycle

Licensee distribution designee  
Licensee name/address

SUBJECT: Annual Security Assessment Letter—**(Official Plant Name)** (Report XX-XXXX)

Dear **(Mr./Ms. last name of addressee)**

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

On **(date)**, the NRC staff completed its performance review of **(official plant name)** for the calendar year 200**(X)** assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 200X for **(plant name)**. The purpose of this letter is to inform you of our assessment of your security performance during this period and our plans for future security-related inspections at your facility so you can inform us of any planned inspections that may conflict with your plant activities.

**[Use the following sentences as appropriate]**

Overall, **(plant name)** was operated in a manner that preserved public health and safety, promoted the common defense and security, and fully met the cornerstone objective. Plant performance for the fourth quarter, as well as for the first three quarters of the assessment cycle, was within the Licensee Response column of the NRC’s security action matrix because all inspection findings had very low safety significance (Green) and all PIs indicated that no additional NRC oversight was required (Green).

**[Add the following if needed.]** However, **(insert finding)** is still being reviewed under the physical protection significance determination process. When finalized, the finding may change our assessment of your plant’s security performance. **(Give additional details as necessary.)** Therefore, we will conduct only security baseline inspections at your facility through September 30, 200X. We will also conduct several non-ROP security inspections, including **[insert appropriate inspections. Do not include force-on-force exercises, which will be announced by headquarters]**.

**[Add the following paragraph for any non-SDP Severity Level III or greater enforcement action taken from January 1–December 31, 200X, if applicable.]**

Additionally, on **(month day, year)**, the staff issued a Severity Level **(I, II, or III)** notice of violation in accordance with the NRC’s Enforcement Policy. **[Provide additional details, including followup actions as necessary; however, do not provide detailed information on NRC or licensee actions already discussed in the previous mid-cycle letter.]**

The enclosed inspection plan lists the security-related inspections scheduled through September 30, 200X. **[The inspection schedule should be planned 18 months out from the date of issuance of the annual assessment letter. Also mention infrequent inspections or inspections that are unusual for the plant. However, do not include force-on-force exercises, which are announced by headquarters.]**

The inspection plan is provided to minimize disruptions to your staff and to allow scheduling conflicts and personnel availability issues to be resolved well before our inspectors arrive onsite. The inspections in the last 9 months of the inspection plan are tentative and the plan may be revised at the mid-cycle review meeting. Routine force-on-force inspections are conducted approximately every 3 years. You will be notified by separate correspondence 8 to 10 weeks in advance of any force-on-force inspections scheduled for your facility.

If we change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact me at **(telephone number)** if you have any questions about this letter or the inspection plan.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(name)**, Chief  
**(Branch)**  
Division of Reactor Safety

Docket Nos. 50-ABC, 50-XYZ  
License Nos. NPF-0, NPF-0

Enclosure: **(Plant name)** Inspection Plan

cc.  
Nonpublic cc list

Distribution:  
Nonpublic distribution list  
| Chief, NSIR/DSP/RSB  
| Chief, NSIR/DSO/RSOB  
| [RidsNsirDso@nrc.gov](mailto:RidsNsirDso@nrc.gov)

## Exhibit 6

### Sample Security Cornerstone Annual Assessment Letter for Plants in the Licensee Response Band Column That Were in Other Action Matrix Columns During the Assessment Cycle

Licensee distribution designee  
Licensee name/address

SUBJECT: Annual Security Assessment Letter—**(Official Plant Name)**

Dear **(Mr./Ms. Last name of addressee)**

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

On **(date)**, the NRC staff completed its performance review of **(official plant name)** for the calendar year 200**(X)** assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 200**X** for **(plant name)**. The purpose of this letter is to inform you of our assessment of your security performance during this period and our plans for future security-related inspections at your facility so you can inform us of any planned inspections that may conflict with your plant activities.

**[Use the following sentences as applicable.]**

Overall, **(plant name)** was operated in a manner that preserved public health and safety, promoted the common defense and security, and met the security cornerstone objective. Security performance for the most recent quarter was within the Licensee Response column of the NRC’s security action matrix because all inspection findings had very low safety significance (Green) and the PIs for the latest quarter indicated no additional NRC oversight was required (Green). However, **(insert finding)** is still being reviewed under the physical protection significance determination process. **[Give additional details, as necessary]**. Therefore, we will conduct only security baseline inspections at your facility through September 30, 200**X**. We will also conduct several non-ROP security inspections, including **[insert appropriate inspections. Do not include force-on-force exercises, which will be announced by headquarters]**.

While plant security performance for the most recent quarter is within the Licensee Response column of the security action matrix, there were security significant **(inspection findings|performance indicators)** during the first three quarters of the assessment cycle. **[Give a brief summary of the significant inspection findings and performance indicators from the first three quarters of the cycle, including agency and licensee actions.]**

**[Add the following paragraph for any non-SDP Severity Level III or greater enforcement action taken from January 1–December 31, 200X, if applicable.]**

Additionally, on **(month day, year)**, the staff issued a Severity Level **(I, II, or III)** notice of violation in accordance with the NRC's Enforcement Policy. **[Provide additional details including followup actions as necessary. However, do not provide detailed information on NRC or licensee actions already discussed in the previous mid-cycle letter.]**

The enclosed inspection plan lists the security-related inspections scheduled through September 30, 200X. **[The inspection schedule should be planned 18 months out from the date of issuance of the annual assessment letter. Also mention infrequent inspections or inspections that are unusual for the plant. However, do not include force-on-force exercises, which are announced by headquarters.]**

The inspection plan is provided to minimize disruptions to your staff and to allow scheduling conflicts and personnel availability issues to be resolved well before our inspectors arrive onsite. The inspections in the last 9 months of the inspection plan are tentative and the plan may be revised at the mid-cycle review meeting. Routine force-on-force inspections are conducted approximately every 3 years. You will be notified by separate correspondence 8 to 10 weeks in advance of any force-on-force inspections scheduled for your facility.

If we change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact **(DRS branch chief)** at **(telephone number)** if you have any questions about this letter or the inspection plan.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(Name)**, Director<sup>1</sup>  
Division of Reactor Safety, Region **[I, II, III, IV]**

Docket Nos. 50-ABC, 50-XYZ  
License Nos. NPF-0, NPF-0

Enclosure: **(Plant name)** Security Inspection Plan

cc.  
Nonpublic cc list

Distribution:  
Nonpublic distribution list  
| Chief, NSIR/DSP/RSB

Chief, NSIR/DSO/RSOB  
[RidsNsrDso@nrc.gov](mailto:RidsNsrDso@nrc.gov)

|  
|

Note 1: Refer to the security action matrix for proper signature authority. Signature authority is determined by the most significant column of the action matrix that the plant has been in over the four quarters of the assessment cycle.

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## Exhibit 7

### Sample Security Cornerstone Annual Assessment Letter for Plants in the Regulatory Response Column

Licensee distribution designee  
Licensee name/address

SUBJECT: Annual Security Assessment Letter—(Official Plant Name)

Dear (Mr./Ms. last name of addressee)

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

On (date), the NRC staff completed its performance review of (official plant name) for the calendar year 200(X) assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 200X for (plant name). The purpose of this letter is to inform you of our assessment of your security performance during this period and our plans for future security-related inspections at your facility so you can inform us of any planned inspections that may conflict with your plant activities.

**[Use the following sentences as applicable.]**

Overall, (plant name) was operated in a manner that preserved public health and safety, promoted the common defense and security, and met the cornerstone objectives with only minimal degradation in security performance. Security performance for the most recent quarter was within the Regulatory Response column of the NRC’s security action matrix for the following reasons. **[Enumerate the security-significant inspection findings and PIs and briefly state their significance].** However, (insert finding) is still being reviewed under the physical protection significance determination process. **[Give additional details as necessary.]**

**[Describe the security-significant inspection findings and performance indicators including agency and licensee responses to the issues.]**

Although plant performance for the most recent quarter was within the Regulatory Response column of the security action matrix, there were security significant (inspection findings|performance indicators) during the first three quarters of the assessment cycle. **[Summarize security-significant inspection findings and performance indicators from the first three quarters of the assessment cycle, including agency and licensee actions.]**

**[Add the following paragraph for any non-SDP Severity Level III of greater enforcement action taken from January 1–December 31, 200X, if applicable.]**

Additionally, on (month day, year), the staff issued a Severity Level (I, II, or III) notice of violation in accordance with the NRC’s Enforcement Policy. **[Provide additional details, including followup actions as necessary. Do not provide detailed**

**information on NRC or licensee actions already discussed in the previous mid-cycle letter]**

The enclosed inspection plan lists the security-related inspections scheduled through September 30, 200X. **[The inspection schedule should be planned 18 months out from the date of issuance of the annual assessment letter. Also mention infrequent inspections or inspections that are unusual for the plant. However, do not include force-on-force exercises, which are announced by headquarters.]**

The inspection plan is provided to minimize disruptions to your staff and to allow scheduling conflicts and personnel availability issues to be resolved well before our inspectors arrive onsite. The inspections in the last 9 months of the inspection plan are tentative and the plan may be revised at the mid-cycle review meeting. Routine force-on-force inspections are conducted approximately every 3 years. You will be notified by separate correspondence 8 to 10 weeks in advance of any force-on-force inspections scheduled for your facility.

If we change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact **(DRS branch chief)** at **(telephone number)** if you have any questions about this letter or the inspection plan.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(Name)**, Director<sup>1</sup>  
Division of Reactor Safety, Region **[I, II, III, IV]**

Docket Nos. 50-ABC, 50-XYZ  
License Nos. NPF-0, NPF-0

Enclosure: **(Plant name)** Security Inspection Plan

cc.  
Nonpublic cc list

Distribution:  
Nonpublic distribution list  
| Chief, NSIR/DSP/RSB  
| Chief, NSIR/DSO/RSOB  
| [RidsNsirDso@nrc.gov](mailto:RidsNsirDso@nrc.gov)  
|

Note 1: Refer to the security action matrix for proper signature authority. Signature authority is determined by the most significant column of the action matrix that the plant has been in over the four quarters of the assessment cycle.

## Exhibit 8

### Sample Security Cornerstone Annual Assessment Letter for Plants in the Degraded Cornerstone Column

Licensee distribution designee  
Licensee name/address

SUBJECT: Annual Security Assessment Letter—**(Official Plant Name)** (Report XX-XXXX)

Dear **(Mr./Ms. last name of addressee)**

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

On **(date)**, the NRC staff completed its performance review of **(official plant name)** for the calendar year 200**(X)** assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 200**X** for **(plant name)**. The purpose of this letter is to inform you of our assessment of your security performance during this period and our plans for future security inspections at your facility so you can inform us of any planned inspections that may conflict with your plant activities.

Overall, **(plant name)** was operated in a manner that preserved public health and safety, promoted the common defense and security, and met the cornerstone objective with only moderate degradation in performance. Security performance for the most recent quarter was within the Degraded Cornerstone column of the NRC’s security action matrix for the following reasons. **[Enumerate the security-significant inspection findings and PIs and briefly state their significance. Add the following sentence, if necessary.]** However, **(insert finding)** is still being reviewed under the physical protection significance determination process. When finalized, the finding may change our assessment of your plant’s security performance. **[Give additional details as necessary.]**

**[Describe the security-significant inspection findings and performance indicators, including agency and licensee responses to the issues.]**

Although plant performance for the most recent quarter is within the Degraded Cornerstone column of the security action matrix, there were additional security-significant **(inspection findings or performance indicators)** during the first three quarters of the assessment cycle. **[Summarize the security-significant inspection findings and performance indicators from the first three quarters of the assessment cycle, including agency and licensee actions.]**

**[Add the following paragraph for any non-SDP Severity Level III or greater enforcement action taken from January 1–December 31, 200X, if applicable.]**

Additionally, on **(month day, year)**, the staff issued a Severity Level **(I, II, or III)** notice of violation in accordance with the NRC's Enforcement Policy. **[Provide additional details including followup actions as necessary. Do not provide detailed information on NRC or licensee actions already discussed in the previous mid-cycle letter.]**

**[Add either of the following two paragraphs as applicable.]**

The enclosed inspection plan lists the security inspections scheduled through September 30, 200X. **[The inspection schedule should be planned 18 months out from the date of issuance of the annual assessment letter. Also briefly mention infrequent inspections or inspections that are unusual for the plant, except force-on-force inspections, which will be announced by headquarters.]** The inspection plan is provided to minimize the disruption to your staff and to allow scheduling conflicts and personnel availability issues to be resolved well before our inspectors arrive on site. Several of our planned inspections do not appear on the attached plan because they are being conducted as unannounced inspections in response to plant performance in the Degraded Cornerstone column of the security action matrix. The inspections in the last 9 months of the inspection plan are tentative and the plan may be revised at the mid-cycle review meeting. Routine force-on-force inspections are conducted approximately every 3 years. You will be notified by separate correspondence 8 to 10 weeks in advance of any force-on-force inspections scheduled for your facility.

If we change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact **(DRS branch chief)** at **(telephone number)** if you have any questions about this letter.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(Name)**

Regional Administrator,<sup>1</sup> Region **[I, II, III, IV]**

Docket Nos. 50-ABC, 50-XYZ

License Nos. NPF-0, NPF-0

Enclosure: **(Plant name)** Inspection Plan **[if enclosed]**

cc.

Nonpublic cc list

Distribution:

Issue Date: 04/04/07

E8-2

0320

Nonpublic distribution list

Chief, NSIR/DSP/RSB  
Chief, NSIR/DSO/RSOB  
[RidsNsirDso@nrc.gov](mailto:RidsNsirDso@nrc.gov)

Note 1: Refer to the security action matrix for proper signature authority. Signature authority is determined by the most significant column of the action matrix that the plant has been in over the four quarters of the assessment cycle.

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## Exhibit 9

### Sample Security Cornerstone Annual Assessment Letter for Plants in the Repetitive Degraded Cornerstone Column

Licensee distribution designee  
Licensee name/address

SUBJECT: Annual Security Assessment Letter—(Official Plant Name) (Report XX-XXXX)

Dear (Mr./Ms. last name of addressee)

**[Mark the top and bottom of each page of the letter with “Exempt from Public Disclosure in Accordance With 10 CFR 2.390”]**

On (date), the NRC staff completed its performance review of (official plant name) for the calendar year 200(X) assessment cycle. Our technical staff reviewed performance indicators (PIs) for the most recent quarter and inspection results for the period from January 1 through December 31, 200X for (plant name). The purpose of this letter is to inform you of our assessment of your security performance during this period and our plans for future security inspections at your facility so you can inform us of any planned inspections that may conflict with your plant activities.

Overall, (plant name) was operated in a manner that preserved public health and safety and promoted the common defense and security. Although (plant name) met the security cornerstone objectives, it remained within the Repetitive Degraded Cornerstone column of the security action matrix with longstanding issues or significant degradation in security performance. The plant’s performance is in this column for the following reasons. **[Enumerate the security-significant inspection findings and PIs, and briefly state their significance]**. However, (insert finding) is still being reviewed under the physical protection significance determination process. **[Give additional details as necessary.]**

**[Describe the security-significant inspection findings and performance indicators, including agency and licensee responses to the issues.]**

**[Summarize the security-significant inspection findings and performance indicators from the first three quarters of the assessment cycle, including agency and licensee actions].**

**[Add the following paragraph for any non-SDP Severity Level III or greater enforcement action taken from January 1–December 31, 200X, if applicable.]** Additionally, on (month day, year), the staff issued a Severity Level (I, II, or III) notice of violation in accordance with the NRC’s Enforcement Policy. **[Provide additional details including followup actions as necessary. Do not provide detailed information on NRC or licensee actions already discussed in the previous mid-cycle letter.]**

**[Include the following paragraph if applicable.]**

You are requested to provide our office with a copy of any performance improvement plan that you have developed so that we can coordinate our inspection activities accordingly. Because the security cornerstone (**has been/was**) degraded for an extended period, we believe a meeting between the Executive Director for Operations and your senior management is appropriate. I will be contacting you to arrange for a mutually agreeable time and location for a meeting to discuss your declining performance and your proposed actions to correct the deficiencies.

In accordance with IMC 0305, "Operating Reactor Assessment Program," we will discuss your plant at the upcoming Agency Action Review Meeting. We will notify you by separate correspondence if any agency actions change as a result of the meeting.

**[Add either of the following two paragraphs as applicable.]**

The enclosed inspection plan lists the security inspections scheduled through September 30, 200X. **[The inspection schedule should be planned 18 months out from the date of issuance of the annual assessment letter. Also briefly mention infrequent inspections or inspections that are unusual for the plant, except force-on-force inspections, which will be announced by headquarters.]** The inspection plan is provided to minimize disruptions to your staff and to allow scheduling conflicts and personnel availability issues to be resolved well before our inspectors arrive on site. | The inspections in the last 9 months of the inspection plan are tentative and the plan may be revised at the mid-cycle review meeting. Routine force-on-force inspections are conducted approximately every 3 years. You will be notified by separate correspondence 8 to 10 weeks in advance of any force-on-force inspections scheduled for your facility.

Normally we would advise you of our planned security inspections for the next 18 months. However, we are not announcing our security inspections at **(plant name)** because the plant's security performance is in the Repetitive Degraded Cornerstone column of the NRC's security action matrix. An inspection plan may be enclosed with the next mid-cycle security assessment letter.

If we change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact **(DRS branch chief)** at **(telephone number)** if you have questions about this letter.

While we are fully committed to our goal of ensuring openness in our regulatory process, we must balance that goal with the more immediate need of ensuring the continued safety and secure operation of nuclear facilities and the protection of nuclear materials in our country. Thus due to the security-related concerns contained in this correspondence, and in accordance with 10 CFR 2.390, a copy of this letter and its enclosure will not be available for public inspection in either the NRC Public Document Room or the Publicly Available Records (PARS) component of NRC's document system (ADAMS).

**(Name)**

Regional Administrator,<sup>1</sup> Region **[I, II, III, IV]**

Docket Nos. 50-ABC, 50-XYZ

Issue Date: 04/04/07

E9-2

0320

License Nos. NPF-0, NPF-0

Enclosure: **(Plant name)** Inspection Plan **[if enclosed]**

Nonpublic cc list

Distribution:

Nonpublic distribution list

Chief, NSIR/DSP/RSB

Chief, NSIR/DSO/RSOB

[RidsNsirDso@nrc.gov](mailto:RidsNsirDso@nrc.gov)

Note 1: Refer to the security action matrix for the proper signature authority. The signature authority is determined by the most significant column of the action matrix that the plant has been in over the four quarters of the assessment cycle.

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ATTACHMENT 1

Revision History for IMC 0320

Commitment Tracking No.	Issue Date	Description of Change	Training Needs	Training Completed	Comment Resolution ADAMS No.
N/A	N/A	Researched commitments back four years - none found	None	N/A	N/A
N/A	8/22/05	Initial issue	None	N/A	N/A
N/A	04/04/07 CN 07-012	Revised to include substantial cross-cutting issue guidance	None	N/A	N/A