



U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN

**14.3.12 PHYSICAL SECURITY HARDWARE - INSPECTIONS, TESTS, ANALYSES,
AND ACCEPTANCE CRITERIA**

REVIEW RESPONSIBILITIES

Primary - Organization responsible for the review of Physical Security Hardware

Secondary - None

I. AREAS OF REVIEW

NRC staff should review physical security hardware inspections, tests, analyses, and acceptance criteria (PS-ITAAC) for the facility's physical security system for consistency within Standard Review Plan (SRP) Section 14.3.12 Appendix A. PS-ITAAC specifically reviews equipment and/or features used for the physical security attributes of detection, assessment, delay, and response to protect against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a).

This SRP section specifically addresses ITAAC related to physical security hardware. Physical security hardware characteristics include, but are not limited to, communication systems, assessment and alarm systems, locks, personnel access control, physical equipment barriers, and surveillance devices. ITAAC information is contained in the final safety analysis report (FSAR) of a combined license (COL) application or Tier 1 information from the design control document (DCD) of a design certification (DC) application.

March 2007

USNRC STANDARD REVIEW PLAN

This Standard Review Plan, NUREG-0800, has been prepared to establish criteria that the U.S. Nuclear Regulatory Commission staff responsible for the review of applications to construct and operate nuclear power plants intends to use in evaluating whether an applicant/licensee meets the NRC's regulations. The Standard Review Plan is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide an acceptable method of complying with the NRC regulations.

The standard review plan sections are numbered in accordance with corresponding sections in Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)." Not all sections of Regulatory Guide 1.70 have a corresponding review plan section. The SRP sections applicable to a combined license application for a new light-water reactor (LWR) are based on Regulatory Guide 1.206, "Combined License Applications for Nuclear Power Plants (LWR Edition)."

These documents are made available to the public as part of the NRC's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Individual sections of NUREG-0800 will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience. Comments may be submitted electronically by email to NRR_SRP@nrc.gov.

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The specific areas of review are as follows:

1. For a DC application:
 - A. The staff reviews the proposed ITAAC that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a plant that incorporates the design certification is built and will operate in accordance with the design certification, the Atomic Energy Act, and the NRC regulations.
 - B. The staff reviews the justification that compliance with the interface requirements is verifiable through ITAAC. The staff also reviews the method that is to be used for verification of the interface requirements.
2. For a COL application:
 - A. The staff reviews the proposed ITAAC that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the Atomic Energy Act, and the NRC regulations.
 - B. If the application references a standard design certification, the staff verifies that the ITAAC contained in the certified design apply to those portions of the facility design that are approved in the design certification.
3. COL Action Items and Certification Requirements and Restrictions. For a DC application, the review will also address COL action items and requirements and restrictions (e.g., interface requirements and site parameters).

For a COL application referencing a DC, a COL applicant must address COL action items (referred to as COL license information in certain DCs) included in the referenced DC. Additionally, a COL applicant must address requirements and restrictions (e.g., interface requirements and site parameters) included in the referenced DC.

Review Interfaces

Other SRP sections interfaces with this section as follows:

1. SRP sections 13.6.1 and 13.6.2 provide physical security review guidance for COL and DC reviews, respectively.

The specific acceptance criteria and review procedures are contained in the referenced SRP sections.

II. ACCEPTANCE CRITERIA

Requirements

Acceptance criteria are based on meeting the relevant requirements of the following Commission regulations:

1. 10 CFR 73.1 as it relates to the prescribed requirements for the establishment and maintenance of a physical protection system and to protect against the design basis threat of radiological sabotage.
2. 10 CFR 73.55 as it relates to the requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage.
3. 10 CFR 73.70(f) as it relates to the requirements specific to design for alarm annunciation records.
4. 10 CFR 52.47(b)(1), which requires that a DC application contain the proposed inspections, tests, analyses, and acceptance criteria (ITAAC) that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, a plant that incorporates the design certification is built and will operate in accordance with the design certification, the provisions of the Atomic Energy Act, and the NRC's regulations;
5. 10 CFR 52.80(a), which requires that a COL application contain the proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the provisions of the Atomic Energy Act, and the NRC's regulations.

SRP Acceptance Criteria

Specific SRP acceptance criteria acceptable to meet the relevant requirements of the NRC's regulations identified above are as follows for the review described in this SRP section. The SRP is not a substitute for the NRC's regulations, and compliance with it is not required. However, an applicant is required to identify differences between the design features, analytical techniques, and procedural measures proposed for its facility and the SRP acceptance criteria and evaluate how the proposed alternatives to the SRP acceptance criteria provide acceptable methods of compliance with the NRC regulations.

1. Appendix A to this SRP section provides an acceptable set of generic PS-ITAAC that an applicant may use to develop application-specific PS-ITAAC, tailored to specific physical security hardware requirements. Appendix A is not all-inclusive, or exclusive of other PS-ITAAC an applicant may propose. Additional plant-specific PS-ITAAC (i.e., beyond those listed in Appendix A) may be proposed and will be examined to determine their acceptability on a case-by-case basis.

Technical Rationale

The technical rationale for application of these acceptance criteria to the areas of review addressed by this SRP section is discussed in the following paragraphs:

1. 10 CFR 50.34(c) requires that license applications to operate a production or utilization facility include a physical security plan that provides high assurance against the design basis threat outlined in Part 73.1 (a), to ensure activities involving special nuclear material are not inimical to common defense and security and do not constitute an unreasonable risk to the public health and safety.
2. 10 CFR 50.34(d) requires that license applications to operate a production or utilization facility must include a safeguards contingency plan in accordance with the criteria of 10 CFR 73, Appendix C.
3. 10 CFR 73.55 establishes the detailed requirements for development and implementation of a physical security plan. The physical security plan defines the administrative, physical and operational measures that provide protection of the facility, and any associated special nuclear material, from both internal and external threats. Compliance with 10 CFR 73.55 provides high assurance that the plant is protected against theft or diversion of nuclear material or radiological sabotage.
4. 10 CFR 73.56 establishes the requirements for the development and implementation of a program, as part of the physical security plan, for granting individuals unescorted access to protected and vital areas. Compliance with 10 CFR 73.56 provides high assurance that individuals granted unescorted access are trustworthy and reliable and do not constitute an unreasonable risk to the health and safety of the public including a potential to commit radiological sabotage.
5. 10 CFR 73.70(f) establishes the requirement for recording of each onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication that identifies the type of alarm, location, alarm circuit, date, and time.

III. REVIEW PROCEDURES

The reviewer will select material from the ITAAC listed in Appendix A, as may be appropriate for a particular case.

These review procedures are based on the identified SRP acceptance criteria. For deviations from these specific acceptance criteria, the staff should review the applicant's evaluation of how the proposed alternatives to the SRP criteria provide an acceptable method of complying with the relevant NRC criteria identified in Appendix A.

1. For review of a DC application, the reviewer should follow the above procedures to verify that the design, including requirements and restrictions (e.g., interface requirements and site parameters), set forth in the final safety analysis report (FSAR) meets the acceptance criteria. DCs have referred to the FSAR as the design control document (DCD). The reviewer should also consider the appropriateness of identified COL action items. The reviewer may identify additional COL action items; however, to ensure these COL action items are addressed during a COL application, they should be added to the DC FSAR.

For review of a COL application, the scope of the review is dependent on whether the COL applicant references a DC, an early site permit (ESP) or other NRC approvals (e.g., manufacturing license, site suitability report or topical report).

2. Implementation of ITAAC will be inspected in accordance with NRC Inspection Manual Chapter IMC-2503, "Construction Inspection Program - ITAAC Inspections."

IV. EVALUATION FINDINGS

The reviewer verifies that the applicant has provided sufficient information and that the review and calculations (if applicable) support conclusions of the following type to be included in the staff's safety evaluation report. The reviewer also states the bases for those conclusions.

1. The reviewer verifies that sufficient information has been provided to satisfy the requirements of SRP Section 14.3 and this SRP section, and concludes that Tier 1 is acceptable. A finding similar to that in the Evaluation Findings section of SRP Section 14.3 should be provided in a separate section of the SER.
2. For DC and COL reviews, the findings will also summarize the staff's evaluation of requirements and restrictions (e.g., interface requirements and site parameters) and COL action items relevant to this SRP section.

V. IMPLEMENTATION

The staff will use this SRP section in performing safety evaluations of DC applications and license applications submitted by applicants pursuant to 10 CFR Part 50 or 10 CFR Part 52. Except when the applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the staff will use the method described herein to evaluate conformance with Commission regulations.

The provisions of this SRP section apply to reviews of applications submitted six months or more after the date of issuance of this SRP section, unless superseded by a later revision.

VI. REFERENCES

1. NRC Inspection Manual Chapter IMC-2503, "Construction Inspection Program - ITAAC Inspections," issued April 26, 2006.
2. 10 CFR Part 73, "Physical Protection of Plants and Materials."
3. 10 CFR 8.5, "Interpretation by the General Counsel of 10 CFR Part 73.55 of this Chapter; Illumination and Physical Search Requirements."
4. 10 CFR Parts 73.56 and 73.57, "Access Authorization for Licensed Personnel."
5. 10 CFR 50.34(c), "Physical Security Plan."

PAPERWORK REDUCTION ACT STATEMENT

The information collections contained in the Standard Review Plan are covered by the requirements of 10 CFR Part 50 and 10 CFR Part 52, and were approved by the Office of Management and Budget, approval number 3150-0011 and 3150-0151.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

SRP Section 14.3.12

Appendix A

Physical Security Hardware—Equipment and/or features used for the physical security attributes of detection, assessment, delay, and response and to protect against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a). Examples of physical security system hardware include, but are not limited to, communication systems, assessment and alarm systems, locks, personnel access control, physical equipment barriers, and surveillance devices.				
Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
73.55(c)(1) Physical barriers. The licensee shall locate vital equipment only within a vital area, which in turn, shall be located within a protected area such that access to vital equipment requires passage through at least two physical barriers of sufficient strength to meet the performance requirements of paragraph (a) of this section. More than one vital area may be located within a single protected area.	(1) Vital equipment shall be located only within a vital area. (2) Access to vital equipment requires passage through at least two physical barriers.	(1) Inspections will be performed so that all vital equipment, as designed, is located within a vital area. (2) Access to vital equipment requires passage through at least two physical barriers meeting performance requirements.	A report exists and concludes that all intended vital equipment is (1) located only within a vital area, which in turn, is (2) located within a protected area such that access to the as-built vital equipment requires passage through at least two physical barriers meeting performance requirements.	1
73.55(c)(2) The physical barriers at the perimeter of the protected area shall be separated from any other barrier designated as a physical barrier for a vital area within the protected area.	Physical barriers for protected area perimeter not part of vital area barrier.	An inspection of the protected area perimeter barrier will be performed to verify that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a physical barrier.	A report exists and concludes that physical barriers at the perimeter of the protected area are separated from any other barrier designated as a physical barrier.	2
73.55(c)(3) Isolation zones shall be maintained in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and shall be of sufficient size to permit observation of the activities of people on either side of that barrier in the event of its penetration. If parking facilities are provided for employees or visitors, they shall be located outside the isolation zone and exterior to the protected area barrier.	Isolation zones shall be maintained in outdoor areas adjacent to the physical barrier at the perimeter of the protected area permit observation on either side of the barrier.	An inspection of the isolation zone will be performed to verify that the isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and are at least as large as specified in the design and allow observation of the activities of people on either side of	A report exists and concludes that verifies isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and are at least as large as specified in the design to permit observation of the activities of people on either side of the barrier in the event of its penetration or attempted penetration.	3

Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
		the barrier in the event of its penetration or attempted penetration.		
73.55(c)(4) Detection of penetration or attempted penetration of the protected area or the isolation zone adjacent to the protected area barrier shall assure that adequate response by the security organization can be initiated.	Intrusion detection system detects penetration or attempted penetration of the Protected Area (PA) Barrier.	Tests and Inspections of the protected area (PA) intrusion detection system will be performed to verify system is installed as designed and penetration or attempted penetration of the protected area barrier is detected and that subsequent alarms annunciate in both the Central Alarm Station (CAS) and Secondary Alarm Station (SAS).	A report exists and concludes that the intrusion detection system detects penetration or attempted penetration of the PA barrier and that subsequent alarms annunciate in the CAS and SAS.	4
73.55(c)(5) Isolation zones and all exterior areas within the protected area shall be provided with illumination sufficient for the monitoring and observation requirements of paragraphs (c)(3), (c)(4), and (h)(4) of this section, but not less than 0.2 footcandle measured horizontally at ground level.	All exterior areas within the protected area are illuminated.	Inspection of the illumination in the isolation zones of the PA and all external areas within the PA is not less than 0.2 footcandle measured horizontally at ground level.	A report exists and concludes that illumination in isolation zones and all exterior areas within the protected area is not less than 0.2 footcandle measured horizontally at ground level.	5
73.55(c)(6) The walls, doors, ceiling, floor, and any windows in the walls and in the doors of the reactor control room shall be bullet-resisting.	The external walls, doors, ceiling and floors in the main control room, central alarm station, and the last access control function for access to the protected area are bullet resistant.	Type test, analysis or a combination of type test and analysis of the systems of the external walls, doors, ceilings, floors, and any windows in the walls in the main control room, central alarm station, secondary alarm station, and the	A report exists and concludes that the bullet resistance features for the reactor control room, the central alarm station, secondary alarm station, and the location within which the last access control function for access to the protected area are installed as designed.	6

Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
		enclosure that houses the individual that has the last access control function for access into the PA are bullet resistant and installed as designed.		
<p>73.55(c)(7) Vehicle control measures, including vehicle barrier systems, must be established to protect against use of a land vehicle, as specified by the Commission, as a means of transportation to gain unauthorized proximity to vital areas.</p> <p>73.55(c)(8) Each licensee shall compare the vehicle control measures established in accordance with 10 CFR 73.55 (c)(7) to the Commission's design goals (i.e., to protect equipment, systems, devices, or material, the failure of which could directly or indirectly endanger public health and safety by exposure to radiation) and criteria for protection against a land vehicle bomb. Each licensee shall either:</p> <p>(i) Confirm to the Commission that the vehicle control measures meet the design goals and criteria specified; or</p> <p>(ii) Propose alternative measures, in addition to the measures established in accordance with 10 CFR 73.55 (c)(7), describe the level of protection that these measures would provide against a land vehicle bomb, and compare the costs of the alternative measures with the costs of measures necessary to fully meet the design goals and criteria. The Commission will approve the proposed alternative measures if they provide substantial protection against a land vehicle bomb, and it is determined by an analysis, using the essential elements of 10 CFR 50.109, that the costs of fully meeting the design goals and criteria are not justified by the added protection that would be provided.</p>	<p>Vehicle control measures which include vehicle barrier systems protect against use of a land vehicle.</p>	<p>Inspections, analysis or a combination of inspections and analysis of the systems will be performed for vehicle control measures, including vehicle barrier systems, to ensure they have been constructed in accordance with their design.</p>	<p>A report exists and concludes that vehicle control measures, including vehicle barrier systems, have been constructed in accordance with their design.</p>	<p>7</p>

Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
73.55(d) Access Requirements. (1) The licensee shall control all points of personnel and vehicle access into a protected area. Identification and search of all individuals unless otherwise provided in this section must be made and authorization must be checked at these points. The search function for detection of firearms, explosives, and incendiary devices must be accomplished through the use of both firearms and explosive detection equipment capable of detecting those devices.	(i) Control personnel and vehicle access points into protected area. (ii) Firearms, explosives, and incendiary devices detection equipment capable of detection.	A test of the installed systems and equipment will be performed to verify that: (i) All personnel and vehicle access into the protected area is controlled. (ii) Detection equipment is capable of detecting explosives, incendiary devices, and firearms.	A report exists and concludes that: (i) All access points for the PA are configured as designed. (ii) Equipment used for detection of firearms, incendiary devices, and explosives at the protected area access points function as intended in their design.	8
73.55(d)(5)(i) A numbered picture badge identification system must be used for all individuals who are authorized access to protected areas without escort.	Test the numbered picture badge identification system.	A test of the numbered picture badge identification system is performed to verify that unescorted access to protected areas is granted only to personnel possessing a numbered picture badge.	A report exists and concludes that a numbered picture badge identification system is used for authorized access to protected areas without escort and functions as designed, allowing only those access who are required.	9
73.55(d)(7) The licensee shall: (D) Lock and protect by an activated intrusion alarm system all unoccupied vital areas.	Unoccupied vital areas equipped with locks can be locked and alarmed with activated intrusion detection systems that annunciate in the Central and Secondary Alarm Stations upon intrusion into a vital area.	A test, inspection, or a combination of tests or inspections to verify that unoccupied vital areas are locked and that intrusion will be detected and annunciated in both the CAS and SAS.	A report exists and concludes that unoccupied vital areas are locked and that intrusion will be detected and annunciated in both the CAS and SAS.	10
73.55(e)(1) Detection aids. All alarms required pursuant to this part must annunciate in a continuously manned central alarm station located within the protected area and in at least one other continuously manned station not necessarily onsite, so that a single act cannot remove the capability of calling for assistance or otherwise responding to an alarm. The onsite central alarm station must be considered a vital area and its	Alarm annunciation occurs in the central alarm station and in at least one other continuously manned station not necessarily onsite.	Type test, analysis or a combination of type test and analysis of the installed systems will be performed to ensure that all alarms annunciate in the central alarm station and in at least one other continuously	A report exists and concludes that all alarms annunciate in a continuously manned central alarm station located within the protected area and in at least one other continuously manned station.	11

Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
walls, doors, ceiling, floor, and any windows in the walls and in the doors must be bullet-resisting. The onsite central alarm station must be located within a building in such a manner that the interior of the central alarm station is not visible from the perimeter of the protected area. This station must not contain any operational activities that would interfere with the execution of the alarm response function.		manned station.		
73.55(e)(1) Onsite secondary power supply systems for alarm annunciator equipment and non-portable communications equipment as required in paragraph (f) of this section must be located within vital areas.	Secondary security power supply system for alarm annunciator equipment and non-portable communications equipment is located within a vital area.	(1) Inspections, type test, analysis or a combination of inspections, type test and analysis will be performed to ensure that onsite secondary power supply systems for alarm annunciator equipment and non-portable communications equipment meet system capacity and capability as designed by testing. (2) Location of equipment within a vital area is verified by inspection.	A report exists and concludes that (1) onsite secondary power supply systems for alarm annunciator equipment and non-portable communications equipment meet system design capacity and capability and, (2) equipment is located within a vital area.	12
73.55(e)(2) All alarm devices including transmission lines to annunciators shall be tamper indicating and self-checking e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power. The annunciation of an alarm at the alarm stations shall indicate the type of alarm (e.g., intrusion alarms, emergency exit alarm, etc.) and location.	All alarm devices including transmission lines to annunciators are tamper indicating and self-checking, (e.g. an automatic indication is provided when failure of the alarm system or a component occurs, or when on standby power.) Alarm annunciation shall indicate the type of alarm,	A test is performed to verify that all alarms including transmission lines are tamper indicating and self-checking, (e.g. an automatic indication, is provided when failure of the alarm system or a component occurs, or when on standby power.)	A report exists and concludes that all alarm devices including transmission lines to annunciators provide tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power.)	13

Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
	(e.g., intrusion alarms, emergency exit alarm, etc.) and location.			
73.70(f) A record at each onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication that identifies the type of alarm, location, alarm circuit, date, and time. In addition, details of response by facility guards and watchmen to each alarm, intrusion, or other security incident shall be recorded. The license shall retain each record for three years after the record is made.	Record onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication that identifies the type of alarm, location, alarm circuit, date, and time.	Type test, analysis or a combination of type test and analysis will be performed to ensure that each onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication records and identifies the type of alarm, location, alarm circuit, date, and time.	A report exists and concludes that a record of each onsite alarm annunciation identifies the location of each alarm, false alarm, alarm check, and tamper indication to include the type of alarm, location, alarm circuit, date, and time.	14
73.55(e)(3) All emergency exits in each protected area and each vital area shall be alarmed.	All emergency exits in each protected area and each vital area shall be alarmed.	An inspection, analysis or a combination of inspection and analysis is performed to verify that all emergency exits in each protected area and each vital area are alarmed.	A report exists and concludes that all emergency exits in all protected areas and all vital areas are alarmed.	15
73.55(f) Communication requirements. (1) Each security officer, watchman or armed response individual on duty shall be capable of maintaining continuous communication with an individual in each continuously manned alarm station required by paragraph (e)(1) of this section, who shall be capable of calling for assistance from other security officers, watchmen, and armed response personnel and from local law enforcement authorities. (2) The alarm stations required by paragraph (e)(1) of this section shall have conventional telephone service for communication with the law enforcement authorities as described in paragraph (f)(1) of this section.	(1) Alarm stations have conventional telephone service and other means for communication with law enforcement authorities. (2) Establish continuous communication capability with security personnel.	Type test, analysis or a combination of type test and analysis will be performed to verify that the alarm stations: (1) have conventional telephone service and other means for communication with the law enforcement authorities and (2) are capable of continuous communication with each security officer, watchman or armed	A report exists and concludes that the alarm stations: (1) have conventional telephone service and other means for communication with the law enforcement authorities and (2) are capable of continuous communication with each security officer, watchman or armed response individual, or any security personnel that have responsibilities during a contingency event.	16

Requirements	Design Description	Inspections, Tests, Analysis	Acceptance Criteria	ITAAC
<p>(3) To provide the capability of continuous communication, radio or microwave transmitted two-way voice communication, either directly or through an intermediary, shall be established, in addition to conventional telephone service, between local law enforcement authorities and the facility and shall terminate in each continuously manned alarm station required by paragraph (e)(1) of this section.</p>		<p>response individual, or any security personnel that have responsibilities during a contingency event.</p>		