U.S. NUCLEAR REGULATORY COMMISSION

STANDARD REVIEW PLAN

13.6.1 PHYSICAL SECURITY - COMBINED LICENSE

REVIEW RESPONSIBILITIES

Primary - Organization responsible for the review of physical security

Secondary - None

I. AREAS OF REVIEW

The review involves the evaluation of the security plans (physical security, training and qualification, and the safeguards contingency – collectively the Security Plan), which collectively describes a comprehensive physical security program for the plant site. The review encompasses the regulatory requirements in 10 CFR 73.55 and 10 CFR Part 73, Appendices B and C, and includes: physical security organization, access controls including physical barriers, searches of personnel and packages, a means of detection, assessment, delay and response, selection of personnel for security purposes, arrangements with law enforcement authorities for assistance in responding to security threats, and training of security personnel. The implementation schedule for the physical security program is also reviewed, including phases for a multi-unit plant where applicable.

In addition to the requirements outlined in 10 CFR 73.55, and 10 CFR Part 73 Appendices B and C, this document also addresses security orders (EA-03-086, "Design Basis Threat Order" dated April 29, 2003 (DBT Order); Order EA-02-261, "Access Authorization Order" dated January 7, 2003 (Access Authorization Order); Order EA-03-038, "Fitness-for-Duty Requirements Order" dated April 29, 2003 (FFD Order); and Order EA-03-039, "Security Personnel Training and Qualification Requirements Order" dated April 29, 2003 (Training

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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Order)). Although these orders are not applicable to new applications, they are in the process of being codified. Once codified, applicants must meet the requirements these orders imposed. Where orders are referenced in this document, requirements for new applicants will not go into effect until the rules which codify these orders are finalized.

The Security Plan must describe measures that will be taken to meet the high assurance objective of 10 CFR 73.55(a) to ensure that the overall level of system performance provides protection against the DBT defined in 10 CFR 73.1, as supplemented by Attachment 2 of the DBT Order, equivalent to that which would be provided by 10 CFR 73.55(b) through (h) and that meets the general performance requirements of 10 CFR 73.55.

The NRC staff should review the Security Plan for correct format and content, utilizing the most recent NRC-endorsed revision of the generic security plan template (NEI 03-12). If any deviations from the template are identified in the Security Plan, the NRC staff should conduct a further review of the deviations utilizing the attached appendices.

The NRC staff must also review the Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and combined license (COL) action or information items that are relevant to this SRP section. Physical security hardware ITAAC and the corresponding review procedures relevant to this section are included in 14.3.12, Physical Security Hardware.

The specific areas of review are as follows:

1. <u>COL Action Items and Certification Requirements and Restrictions</u>. 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.

2. <u>Operational Program Description and Implementation</u>. For a COL application, the staff reviews the weapons training, weapons qualification, and requalification program, the physical security program, the access authorization program, the vehicle control program, and the fitness-for-duty program program description and the proposed implementation milestones. The staff also reviews final safety analysis report (FSAR) Table 13.x to ensure that the weapons training, weapons qualification, and requalification program, the physical security program, the access authorization program, the vehicle control program, and the fitness-for-duty program and associated milestones are included.

<u>Review Interfaces</u>

Other SRP sections interface with this section as follows:

1. For COL reviews of operational programs, the review of the applicant's implementation plan is performed under SRP Section 13.4, "Operational Programs."

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

II. ACCEPTANCE CRITERIA

Requirements

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

1. 10 CFR Part 26, “Fitness for Duty Programs”

2. 10 CFR Part 50, “Domestic Licensing of Production and Utilization Facilities”

3. 10 CFR 52.47(b)(1)

4. 10 CFR 52.80(a)

5. 10 CFR 73.2, “Requirements for the Protection of Safeguards Information”

6. 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage"

7. 10 CFR 73.56, “Personnel Access Authorization Requirements for Nuclear Power Plants”

8. 10 CFR 73.57, “Requirements for Criminal History Checks of Individuals Granted Unescorted Access to a Nuclear Power Facility or Access to Safeguards Information by Power Reactor Licensees”

9. 10 CFR Part 73 Appendix B, “General Criteria for Security Personnel”

10. 10 CFR Part 73 Appendix C, “Licensee Safeguards Contingency Plans”

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.

The Security Plan is considered acceptable if it conforms to the most recent NRC-endorsed NEI 03-12 (Generic Security Plan Template) format, and the requirements listed in Appendices 1, 2 and 3 of this document.

1. The physical security plan (PSP) is the physical protection program that provides high assurance against the design basis threat outlined in 10 CFR 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 (Appendix 1).

    A. 10 CFR 73.21 - 10 CFR 73.21 establishes the requirements for the protection of Safeguards Information. The physical security plan, safeguards contingency plan, and any elements of the guard training and qualification plan that disclose

information related to the physical security system or response procedures are considered Safeguards Information. The unauthorized disclosure of this information could compromise the ability of the security organization to provide an appropriate level of protection against, and response to, threats, theft and radiological sabotage. Compliance with 10 CFR 73.21 provides assurance that Safeguards Information is protected against unauthorized disclosure.

B. Section (b) of 10 CFR 73.55 - Physical security organization. The licensee shall establish a security organization, including guards, to protect the facility against radiological sabotage. Security personnel, including guards, shall comply with the requirements of 10 CFR Part 73, Appendix B, "General Criteria for Security Personnel." These general criteria establish requirements for the selection, training, equipping, testing, and qualification of individuals who will be responsible for the protecting of special nuclear materials, nuclear facilities, and nuclear shipments.

C. Section (c) of 10 CFR 73.55 - 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 as defined in 10 CFR 73.2. Isolation zones adjacent to the protected area perimeter shall also be provided. Isolation zone and protected area lighting shall meet the requirements of 10 CFR 73.55(c) including the interpretations in 10 CFR 8.5(b) and (c). The reactor control room perimeter boundaries shall be bullet resisting. Vehicle control measures shall be established in accordance with the requirements of 10 CFR 73.55(c) (7).

D. Section (d) of 10 CFR 73.55 - Access Requirements. The licensee shall control all points of personnel and vehicle access into a protected area. Identification and search of all individuals, packages, and vehicles, unless otherwise provided in 10 CFR 73. shall be made and authorization shall be checked at such points. Access authorization systems shall be designed to accommodate the rapid ingress and egress of authorized individuals and vehicles during emergency conditions or situations that could lead to emergency conditions. The access authorization systems shall ensure vital area access is controlled during non-emergency conditions through individual access authorizations which are periodically reviewed; through maintenance of positive control over vital area access for authorized individuals; and by locking and alarming unoccupied vital areas. Locking devices, including keys and combinations, related to access control to protected and vital areas shall be controlled. Records, in accordance with 10 CFR 73.70(d), shall document the vital area entry and exit of individuals. 10 CFR 73.2 provides additional guidance relative to the use and control of locks, keys, and combinations.

E. Section (e) of 10 CFR 73.55 - Detection Aids. All alarms required pursuant to this part shall 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, such that a single act cannot remove the capabilities of calling for assistance or otherwise responding to an alarm. The central alarm station shall be considered a vital area, shall be bullet resisting, the interior shall not be visible from the protected area perimeter, and associated onsite secondary power supplies for alarm annunciators and non-portable communication equipment must be located within vital areas. All emergency exits from protected and vital areas shall be alarmed. Alarm devices and transmission lines must be tamper indicating and self checking. Regulatory

Guide 5.44 (Testing option 1 or 2) provides additional guidance relevant to perimeter intrusion and vital area alarm systems, respectively. In addition, section B.4.e of Attachment 2 to the ICM Order provides guidance for surveillance equipment and security patrols.

F. Section (f) of 10 CFR 73.55 - Communication Requirements. Each guard, watchman or armed response individual, or any other individual performing an active security function on duty, shall be capable of maintaining continuous communications with an individual in each continuously manned alarm stations. Conventional telephone and radio or microwave transmitted two-way voice communications shall be established with local law enforcement authorities.

G. Section (g) of 10 CFR 73.55 - Testing and Maintenance. Each licensee shall test and maintain intrusion alarms, emergency alarms, communications equipment, access control equipment, physical barriers, and other security-related devices or equipment. Intrusion alarms should be tested in accordance with guidance in Regulatory Guide 5.44. Additional guidance for Protected and Vital Area physical barriers can be found in paragraph C.3.a. of Attachment 2 to the Training Order.

In addition to security system testing and maintenance requirements, licensees shall independently audit the continued effectiveness of the overall security program per the requirements of 10 CFR 73.55(g)(4) and 10 CFR 50.54(p)(3), and the access authorization and fitness for duty programs in accordance with 10 CFR 73.56(g) and 10 CFR 26.80 respectively. Periodic reviews of the interface between the security program and plant and personnel safety shall be addressed in accordance with the requirements of 10 CFR 73.55(d)(7)(ii)(B).

H. Section (h) of 10 CFR 73.55 - Response Requirements. The licensee shall establish, maintain, and follow an NRC-approved safeguards contingency plan. The licensee shall maintain liaison with local law enforcement authorities. Each licensee shall maintain an adequate number of guards for response and assessment of possible security threats. Each licensee shall require that the security organization take steps to evaluate and neutralize the threat when detected with sufficient force to counter the force of the threat. The licensee shall provide a means to observe the isolation zones and physical barrier at the perimeter of the protected area.

I. 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;

J. 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.

2. The Training and Qualification Program (T&QP) (Appendix B of an applicant's security plan) should provide the general criteria for security personnel, which establishes requirements for the selection, training, equipping, testing, and qualification of individuals who are responsible for the protection of special nuclear materials, nuclear facilities, nuclear shipments, and personnel that perform security duties (Appendix 2).

3. The Safeguards Contingency Program (SCP) (Appendix C of an applicant's security plan) should provide specific, defined objectives in the event of threats, thefts, or radiological sabotage relating to special nuclear material or nuclear facilities. The plan contains 1) a predetermined set of decisions and actions to satisfy specified objectives 2) an identification of the data, criteria, procedures, and mechanisms necessary to efficiently implement decisions, and 3) a description of the individual, group, or organizational entity responsible for each decision and action (Appendix 3).

4. Operational Programs. For COL reviews, the description of the operational program and proposed implementation milestone(s) for the weapons training, weapons qualification, and requalification program are reviewed in accordance with 10 CFR 73.55(b)(4)(I) and 10 CFR Part 73, Appendix B, paragraphs II.A, B and C. The description of the operational program and proposed implementation milestone(s) for the physical security program are reviewed in accordance with 10 CFR 73.55. The description of the operational program and proposed implementation milestone(s) for the access authorization program are reviewed in accordance with 10 CFR 73.56(g). The description of the operational program and proposed implementation milestone(s) for the vehicle control program are reviewed in accordance with 10 CFR 73.55(c)(7). The description of the operational program and proposed implementation milestone(s) for the fitness-for-duty program are reviewed in accordance with 10 CFR 26.80. The implementation milestone for all operational programs in this section is prior to the arrival of nuclear fuel onsite.

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 26 establishes the requirements for fitness-for-duty programs with an objective of providing assurance that licensee personnel are not under the influence of any substance, or mentally or physically impaired from any cause, which may adversely effect their ability to safely and competently perform their duties. The fitness-for-duty program is an element of the security plan that controls personnel access to the facility. Compliance with 10 CFR 26 provides assurance that individuals impaired through the use of legal or illegal substances, or otherwise mentally or physically impaired, will not adversely affect the safety of the nuclear power plant by sabotage or inadvertent actions.

2. 10 CFR 50.34(c) requires that license applications to operate a production or utilization facility include a physical security plan that describes how the applicants will meet the requirements of 10 CFR Part 73 (and 10 CFR Part 11, if applicable). See the Technical Rationale for 10 CFR 73.55, (Item 6) below.

3. 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 (See Appendix 3). See the Technical Rationale for 10 CFR 73, Appendix C, (Item 10) below.

4. 10 CFR 50.54(p) requires the licensee to prepare and maintain safeguards contingency plan procedures for effecting the actions and decisions of the responsible organizations as described in the plan. This SRP section reviews the safeguards contingency plan. Compliance with 10 CFR 50.54(p) provides assurance that procedures are developed to provide a structured, disciplined, and organized approach to execution of the safeguards contingency plan in response to perceived dangers to the facility, personnel, or special nuclear material as described in the plan.

5. 10 CFR 73.21 establishes the requirements for the protection of Safeguards Information. The physical security plan, safeguards contingency plan, and any elements of the guard training and qualification plan that disclose information related to the physical security system or response procedures are considered Safeguards Information. The unauthorized disclosure of this information could compromise the ability of the security organization to provide an appropriate level of protection against, and response to, threats, theft and radiological sabotage. Compliance with 10 CFR 73.21 provides assurance that Safeguards Information is protected against unauthorized disclosure.

6. 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 (See Appendix 1) provides high assurance that a facility is protected against theft or diversion of nuclear material or radiological sabotage.

7. 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. The physical security plan is reviewed under this SRP section. 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 public health and safety, including a potential to commit radiological sabotage.

8. 10 CFR 73.57 establishes the requirements for performing criminal history checks of individuals granted unescorted access to a nuclear power facility, special nuclear material, or Safeguards Information. The performance of the criminal background investigation is an additional element of the security program used to determine if an individual should be granted unescorted access to a nuclear facility, special nuclear material, or Safeguards Information. Access authorization is reviewed in this SRP section as part of the physical security plan. Compliance with 10 CFR 73.57 provides an additional element of protection of the facility against individuals that may pose a threat of theft or diversion of nuclear material or radiological sabotage.

9. 10 CFR Part 73 Appendix B establishes the requirements for the selection, training, qualification and equipping of security personnel responsible for the protection of nuclear facilities against acts of radiological sabotage (See Appendix 2). Security personnel qualified in accordance with Appendix B are an integral part of the physical security plan required by 10 CFR 73.55 and reviewed under this SRP section. Compliance with the requirements of 10 CFR Part 73 Appendix B provides assurance that security personnel are adequately prepared to identify, respond to, and repel threats to the nuclear facility and/or material.

10. 10 CFR Part 73 Appendix C establishes the requirements for a safeguards contingency plan (See Appendix 3). The safeguards contingency plan is a documented plan to provide guidance to licensee personnel for responding to threats, thefts, or radiological sabotage relating to nuclear facilities. The safeguards contingency plan is an integral part of the response capabilities and requirements of the physical security plan developed in accordance with 10 CFR 73.55 and reviewed under this SRP section. Compliance with 10 CFR Part 73 Appendix C provides assurance that a licensee is adequately prepared to respond to perceived dangers of nuclear material theft or radiological sabotage.

III. REVIEW PROCEDURES

The reviewer will select material from the procedures described below, as may be appropriate for a particular case.

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

1. Determine if the Security Plan conforms with the most recent NRC-endorsed revision of the generic security plan, NEI 03-12 (template), regulations, the information requirements of subsection I above, and the acceptance criteria of subsection II above.

2. Verify that the weapons training, weapons qualification, and requalification program based on 10 CFR 73.55(b)(4)(I) and 10 CFR Part 73, Appendix B, paragraphs II.A, B and C; the physical security program based on 10 CFR 73.55; the access authorization program based on 10 CFR 73.56; the vehicle control program based on 10 CFR 73.55(c)(7); and the fitness-for-duty program based on 10 CFR 26.80 are fully described and that implementation milestones have been identified. The reviewer should also verify that the programs and implementation milestones are included in FSAR Table 13.x.

Implementation of this program will be inspected in accordance with NRC Inspection Manual Chapter IMC-2504, "Construction Inspection Program - Non-ITAAC Inspections."

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).

After this review, SRP Section 14.3 should be followed for the review of Tier I information for the design, including the postulated site parameters, interface criteria, and ITAAC.

IV. EVALUATION FINDINGS

The reviewer should verify 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 should also state the bases for these conclusions.

The evaluation finding(s) should be substantially equivalent to the following statement:

A Security Plan has been submitted for the protection of the plant against potential acts of radiological sabotage. The Security Plan has been withheld from public disclosure pursuant to 10 CFR 2.390(d).

The applicant described the weapons training and weapons qualification and requalification program based on 10 CFR 73.55(b)(4)(I) and 10 CFR Part 73, Appendix B, paragraphs II.A, B and C; the physical security program based on 10 CFR 73.55; the access authorization program based on 10 CFR 73.56; the vehicle control program based on 10 CFR 73.55(c)(7); the fitness-for-duty program based on 10 CFR 26.80 and their implementation in conformance with the listed regulations.

The Security Plan has been reviewed for format and content utilizing the NRC endorsed Security Plan Template, found to contain all features considered essential of such a program by the staff, and is acceptable. In particular, it has been found to comply with the Commission's regulations including 10 CFR Part 26, 10 CFR Part 50, §50.34(c) and (d), applicable sections of 10 CFR Part 73, including Appendix B and Appendix C, and the Commission Orders including; DBT Order, ICM Order, Training Order, Access Authorization Order, FFD Order and conforms to the applicable regulatory positions set forth in Regulatory Guide 5.44.

For COL reviews, the findings should 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 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 docketed six months or more after the date of issuance of this SRP section, unless superseded by a later revision.

VI. REFERENCES

1. 10 CFR 73.21, "Requirements for the Protection of Safeguards Information."

2. 10 CFR 8.5, "Interpretation by the General Counsel of §73.55 of this Chapter; Illumination and Physical Search Requirements."

3. 10 CFR Parts 73.56 and 73.57, "Access Authorization for Licensed Personnel."

4. 10 CFR Part 26, "Fitness for Duty."

5. 10 CFR 50.34(c), "Physical Security Plan."

6. 10 CFR 50.34(d), "Safeguards Contingency Plan."

7. 10 CFR 50.54(p), "Conditions of Licenses."

8. 10 CFR 50.70(b)(3), "Inspections."

9. 10 CFR Part 73, “Physical Protection of Plants and Materials.”

10. 10 CFR Part 73, Appendices A, B, C, G and H.

11. Federal Register 50 FR 32138, 10 CFR 50, “Policy Statement on Severe Reactor Accidents in Regarding Future Designs and Existing Plants.”

12. NRC Letter to Mr. Stephen D. Floyd, Vice President, Regulatory Affairs, Nuclear Generation Division, NEI. NRC Staff Review of NEI 03-12: Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Program] ADAMS ML033640038.

13. NUREG-1226, “Development and Utilization of the NRC Policy Statement on the Regulation of Advanced Nuclear Power Plants.”

14. EA-02-026, “Interim Compensatory Measures (ICM) Order.”

15. EA-02-261, “Access Authorization Order.”

16. EA-03-039, “Security Personnel Training and Qualification Requirements (Training) Order.”

17. Regulatory Guide 5.44, “Perimeter Intrusion Alarm System.”

18. NRC Inspection Manual Chapter IMC-2504, “Construction Inspection Program - Non-ITAAC Inspections.”

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.

APPENDIX I

PHYSICAL SECURITY PLAN (PSP)

NEI 03-12 TEMPLATE Physical Security Plan (PSP) SECTION TITLE	SECURITY REGULATIONS
Introduction and Facility Layout	10 CFR 11.11(a); 10 CFR 73.21; 10 CFR 50.34(c) and (d); 10 CFR 50.54(p); 10 CFR 50(x) and (y); 10 CFR 73.21(b)(1); 10 CFR 73.55(a) and (c), and the DBT Order. 10 CFR Part 73, Appendix C, Paragraph 3.b, requires that the SCP describe a site-specific physical layout of the facility
Performance Objectives	10 CFR 73.55(a); 10 CFR 73.1(a), Section II of the DBT Order and 10 CFR 73.55(b) through (h)
Performance Evaluation Program	Sections C.1.a and b, C.2.a.6 of Attachment 2 to the Training Order. Also, 10 CFR 73.55(b)(4)(i); 10 CFR 73.55(b)(1)(iii), Section B.4.d and i of Attachment 2 to the ICM Order; 10 CFR 73.55(g)(4)(ii)
Establishment of Security Organization	10 CFR 73.55(b); 10 CFR Part 73, Appendix C
Qualification For Employment In Security	
1. Training of Facility Personnel	10 CFR 50.54(p)(2)(iii), Section B.3.e of Attachment 2 to the ICM Order
2. Security Personnel Training	10 CFR 73.55(b)(4)(i); 10 CFR Part 73, Appendix B; 10 CFR 73.55(b)(4)(ii), Section of the Training Order
3. Local Law Enforcement Liaison	10 CFR 73.55(h)(2), Attachment 2, Section B.4.i of the ICM Order; 10 CFR 73.55(g)(4)(ii)
4. Security Personnel Equipment	10 CFR 73.55(b)(4)(i); 10 CFR Part 73, Appendix B, Section V
5. Work Hour Controls	FFD Order, Attachment 2
Physical Barriers	
1. Protection Against Vehicle Bombs	Attachment 2 of the DBT Order, 10 CFR 73.55(c)(7) and (8); NUREG/CR-4250
2. Channeling Barrier System (as applicable – site specific)	"NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat," dated May 8, 2004, in a letter dated June 8, 2004 and update in an attachment to a letter dated August 24, 2004
3. Protected Area Barrier	10 CFR 73.55(c) and (d), Paragraph B.2.d of Attachment 2 to the ICM Order

4. Vital Area Barrier	10 CFR 73.55(c); 10 CFR 73(d), Section B.4.d of Attachment 2 to the ICM Orders.
5. Delay Barriers	Paragraph B.4.g of Attachment 2 to the ICM Order
Security Posts And Structures	Paragraph B.4.b of Attachment 2 to the ICM Order; 10 CFR 73.55(h)
Keys, Locks, and Combinations	10 CFR 73.55(d); 10 CFR 73.2
Access Requirements	
1. Access Authorization and Fitness for Duty	10 CFR 73.56, as supplemented by the Access Authorization Order; 10 CFR 73.57; Section B.3 of the ICM Order, and the DBT Order;10 CFR Part 26, as supplemented by the FFD Order
2. Insider Mitigation Program	Section 1.B of Attachment 2 to the DBT Order
3. Picture Badge Systems	10 CFR 73.55(d)
4. Searches	
a. VBS Checkpoint	Section (3) of Attachment 2 to the DBT Order; Paragraph B.2.a(1) and (2) of Attachment 2 to the ICM Order; Paragraph B.2.b of Attachment 2 to the ICM Order; "NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat," dated May 8, 2004, in a letter dated June 8, 2004 and update in an attachment to a letter dated August 24, 2004
b. Packages and Materials	10 CFR 73.55(d)
c. PA Vehicle Search	10 CFR 73.55(d)
d. PA Personnel Search	10 CFR 73.55(d)
5. PA Access Controls	10 CFR 73.55(d); Attachment 2, Section B.2.e, of the ICM Order; Paragraph B.3.a of Attachment 2 of the ICM Order; 10 CFR 73(c)(1)
a. Escort and Visitor Requirements	10 CFR 73.55(d); Paragraph B.3.b of Attachment 2 to the ICM Order; Paragraph C.1.5.a of Attachment 4 to the Access Authorization Order
6. VA Access Controls	10 CFR 73.55(d); Paragraph B.3.a of Attachment 2 of the ICM Order; 10 CFR 73(c)(1)
7. Waterborne Threat Measures	Paragraph B.1.b,c and d of Attachment 2 to the ICM Order; Attachment 2, Paragraph (4), of the DBT Order
Assessment and Detection Aids	
1. Illumination	10 CFR 73.55(c), 10 CFR 8.5(b) and (c)
2. Surveillance	Section B.4.e of Attachment 2 to the ICM Order

3. Alarm/Annunciation Equipment	10 CFR 73.55(c)(4), (e)(1) through (e)(3), and (f)(1) through (f)(3)
4. CAS and SAS Operation	10 CFR 73.55(c)(4), (e)(1) through (e)(3), and (f)(1) through (f)(3); 10 CFR 73.55(e)(1) and (f)(4)
5. Security Patrols	Section B.4.e of Attachment 2 to the ICM Order
a. OCA	Same as above.
b. PA and VA	Same as above.
Communications	
1. Notifications	10 CFR 73.55(f); 10 CFR 73.55(e).
2. System Descriptions	10 CFR 73.55(f); 10 CFR 73.55(e).
Review, Evaluation and Audit of the Security Program	10 CFR 73.55 (g)(4)(i)
Response Requirements	10 CFR 73.55(h); Section B.4.a of Attachment 2 to the ICM Order
Special Situations Affecting Security	
1. Refueling/Major Maintenance	10 CFR 73.2; 10 CFR 73.55(c); 10 CFR 73.55(d);10 CFR 73.56(d)(1)
2. Construction and Maintenance	10 CFR 73.55(a); 10 CFR 73.55; 10 CFR 73.55(g)(1)
Testing and Maintenance	
1. PA and VA Physical Barriers and Access Portals	10 CFR 73.55(g)(1) through (3); Paragraph C.3.a. of Attachment 2 to the Training Order
2. Alarms and Annunciators	Same as above.
3. Special Purpose Detectors	Same as above.
4. Communication Equipment	Same as above.
5. Security Personnel Equipment	Same as above.
6. Firearms	Same as above.
7. Active Vehicle Barrier Systems	Same as above.
Compensatory Measures	
1. PA Physical Barriers	10 CFR 73.55(g)
2. VA Barriers	Same as above.
3. Perimeter Intrusion Detection Alarm System	Same as above.

4. PA Lighting	Same as above.
5. VA Portal Alarms	Same as above.
6. Closed Circuit Television/Non-Fixed Camera System	Same as above.
7. Security Computer System	Same as above.
8. PA Device	Same as above.
9. Vehicle Barrier System	Same as above.
10. Channeling Barrier System (as applicable – site specific)	Same as above.
11. Other Security Equipment	Same as above.
Records	10 CFR 73.70; 10 CFR 73.55(b)(1)(ii)
1. Access Authorization Records	10 CFR 73.56(h)(1) and (2)
2. Suitability, Physical, and Mental Qualification Records for Security Personnel	10 CFR 73.55(b)(4)(ii); Section 1.F of Appendix B to 10 CFR Part 73
3. PA and VA Access Control Records	10 CFR 73.55(d); 10 CFR 73.70
a. PA Visitor Access Records	10 CFR 73.55(d)(6)
b. PA Vehicle Access Records	10 CFR 73.70(d)
c. VA Access Transactions Records	10 CFR 73.70(d)
d. Vitalization and De-Vitalization Records	10 CFR 73.70(e)
e. Vital Area Access List Review	10 CFR 73.55(d)(7)(i)(A); Paragraph B.3.a of Attachment 2 to the ICM Order; 10 CFR 73.70(b)
4. Security Plans and Procedures	10 CFR 73.55(b)(3)(i) and (ii)
5. Security Patrols, Inspections, and Tests	10 CFR 73.70(e)
6. Maintenance	10 CFR 73.70(e)
7. Alarm Annunciation and Security Responses	10 CFR 73.70(f)
8. LLEA Liaison	10 CFR 73.55(g)(4)(ii)
9. Record of Audits and Reviews	10 CFR 73.55(g)(4)(ii)

10. Records of Security Related Keys	10 CFR 73.70(e)
11. Security Training and Qualification Records	10 CFR 73.55(b)(4)(i) and (ii); 10 CFR Part 73, Appendix B
12. Weapons Testing and Maintenance Records	Paragraph C.3.a of Attachment 2 to the Training Order; 10 CFR 73.70(e)
13. Engineering Analysis for the Vehicle Barrier System	10 CFR 73.55(c)(9)(iv); 10 CFR 73.70; 10 CFR 73.55(c)(7) and (8)
14. Work Hours Controls	Paragraph C.1(a)(3)(iv) of Attachment 2 to the FFD Order
Digital Systems Security	Paragraph B.5.f of the ICM Order.
Temporary Suspension of Security Measures	
1. Suspension of Security Measures in Accordance with 10 CFR 73.54(x) and 10 CFR 73.54(y)	10 CFR 73.55(a); 10 CFR 50.54(x) and (y); 10 CFR 73.71; 10 CFR 50.72
2. Suspension of Security Measures During Severe Weather or Other Hazardous Conditions	10 CFR 73.55(a)
3. Notification	10 CFR 73.55(a), 10 CFR 73.71, 10 CFR 50.72

APPENDIX II

TRAINING AND QUALIFICATION PLAN (T&QP)

NEI 03-12 TEMPLATE (APPENDIX B) Training & Qualification Plan (T&QP) SECTION TITLE	NRC REGULATIONS
Introduction	10 CFR 73.55(b)(4)(i) and (ii), Section III.A.1 of the DBT Order
Employment Suitability and Qualification	10 CFR Part 73, Appendix B; 10 CFR Part 73, Appendix B, Paragraphs I.A, I.B.1, and I.D; Paragraph C.4.a of Attachment 2 to the Training Order
1. Suitability	Same as above.
2. Physical Qualifications	Same as above.
3. Physical Examination	Same as above.
4. Armed Personnel Requirements	Same as above.
a. Vision	Same as above.
b. Hearing	Same as above.
c. Diseases	Same as above.
d. Addiction	Same as above.
e. Other Physical Requirements	Same as above.
5. Mental Qualifications	10 CFR Part 73; Appendix B, Paragraphs I.B.2, I.C, I.D, I.E and I.F of Appendix B to 10 CFR Part 73
6. General Mental Qualifications	Same as above.
7. Professional Mental Exam	Same as above.
8. Continued Observation	Same as above.
9. Documentation	Same as above.
10. Physical Re-qualification	Same as above.

Individual Training and Qualification	10 CFR Part 73, Appendix B
1. Critical Task Matrix	10 CFR Part 73, Appendix B, Paragraph II.D; Section C.1.b of Attachment 2 to the Training Order
a. Watchperson	Same as above.
b. Armed Security Officer	Same as above.
c. Armed Responder	Same as above.
d. Alarm Station Operator	Same as above.
e. Response Team Leader	Same as above.
f. All other security personnel	Same as above.

Initial Training and Qualification Requirements	10 CFR 73.55(b)(4)(i); 10 CFR Part 73, Appendix B, Paragraphs II.A, B and C
1. Written Exams	Same as above.
2. Skills and Abilities	Same as above.
3. Basic Weapons Qualification	Same as above.
4. Advanced Weapons Qualification	Same as above.
5. Physical Fitness	Same as above.
Continuing Training and Qualification	10 CFR 73.55(b)(4)(i); 10 CFR Part 73, Appendix B, Paragraph II.A, B and C; 10 CFR Part 73, Appendix B, Paragraphs III and IV; Section C.2 of Attachment 2 to the Training Order; 10 CFR Part 73, Appendix B, Paragraph I.C
1. Annual Written Exams	Same as above.
2. Demonstration of Skills and Ability	Same as above.
3. Weapons Training	Same as above.
4. Physical Fitness	Same as above.
5. Documentation	Same as above.
Team Training	10 CFR Part 73, Appendix B, Paragraph II.E; Section C.1.a of Attachment 2 to the Training Order; C.2.a.6 of Attachment 2 to the Training Order
Critical Task Matrix	10 CFR Part 73, Appendix B, Training Order

APPENDIX III

SAFEGUARDS CONTINGENCY PLAN (SCP)

NEI 03-12 TEMPLATE (APPENDIX C) Safeguards Contingency Plan (SCP) SECTION TITLE	NRC REGULATIONS
Background Information	10 CFR 50.34(d); 10 CFR Part 73, Appendix C; 10 CFR 73.55(h)(1)
1. Purpose of SCP	10 CFR Part 73, Appendix C, Section 1.b; Section III.A.1 of the DBT Order
2. Scope of SCP	10 CFR Part 73; Section III.A.1 of the DBT Order
3. Perceived Danger	10 CFR 73.55(a); 10 CFR 73.1(a); Section II of the DBT Order; Attachment 2 to the DBT Order
Generic Planning Base	10 CFR Part 73, Appendix C, Sections 2, 2.a, 2.1, 2.2 and 4
1. Situations Not Covered by SCP	Same as above.
2. Situations Covered by the SCP	Same as above.
3. Responsibility Matrix	10 CFR Part 73, Appendix C
Licensee Planning Base	10 CFR Part 73, Appendix C; ICM Order
1. Licensee Organization	10 CFR Part 73, Appendix C, Paragraph 3.a
2. Physical Layout	10 CFR Part 73, Appendix C, Paragraph 3.b(i)
3. Safeguards System Hardware	10 CFR Part 73, Appendix C, Paragraph 3.c; 10 CFR 50.54(p)(1) and (2)
4. Law Enforcement Assistance	10 CFR Part 73, Appendix C, Paragraph 3.d; Section B.4.i of Attachment 2 to the ICM Order
5. Policy Constraints and Assumptions	10 CFR Part 73, Appendix C, Section 3.e; 10 CFR 73.55(h)(4) and (5)
6. Administrative and Logistical Considerations	10 CFR Part 73, Appendix C, Paragraph 3.f
Response Capabilities	
1. Response to Threats	Section B.4.i of Attachment 2 to the ICM Order; 10 CFR 73.55(h)(5)
2. Armed Response Team	10 CFR 73.55(b)(4)(i); 10 CFR Part 73, Appendix B, Criterion V; 10 CFR 73.55(a); 10 CFR Part 73,

	Appendix C; Section B.4.a and f of Attachment 2 to the ICM Order; 10 CFR 73.55(h)(4) and (5)
3. Supplemental Security Officer	Section B.4.c of the ICM Order
4. Facility Operations Response	Section B.5.b and d of Attachment 2 to the ICM Order; Section B.1.a of Attachment 2 to the ICM Order; 10 CFR Part 73, Appendix C; 10 CFR 73.55(c)(6)
5. Emergency Plan Response	10 CFR Part 73, Appendix C; Paragraph B.5.c, d and e of Attachment 2 to the ICM Order
6. Local Law Enforcement Agencies (LLEA)	Section B.4.i of Attachment 2 to the ICM Order; 10 CFR Part 73, Appendix C, Section 3.d
7. State Response Agencies	Section B.4.i of Attachment 2 to the ICM Order; 10 CFR Part 73, Appendix C, Section 3.d
8. Federal Response Agencies	Section B.4.i of Attachment 2 to the ICM Order; 10 CFR Part 73, Appendix C, Section 3.d
9. ISFSI	Section B.4.i of Attachment 2 to the ICM Order; 10 CFR Part 73, Appendix C, Section 3.d
Defense in Depth	10 CFR 73.55(h)(4)(III)(A)
Primary Security Functions	10 CFR 73.55(a), (b) through (h); 10 CFR Part 73, Appendix C, Paragraph 1.c; Section II of the DBT Order
Protective Strategy Scenarios	10 CFR Part 73, Appendix C; 10 CFR 73.55(a); Paragraph B.4.i and B.5.a of Attachment 2 to the ICM Order