

From: <garrett-cross@charter.net>
To: NRC Public Comments <NRCREP@nrc.gov>
Date: Fri, Sep 21, 2007 5:51 PM
Subject: Comments on DG-5021

> Date: Fri, 21 Sep 2007 17:45:41 -0400
> From: <garrett-cross@charter.net>
> To: NRC Public Comments <NRCREP@nrc.gov>
> Subject:

>
> Dear NRC,

> Please find attached our comments for Draft Regulatory Guide DG-5021, "Managing the Safety/Security Interface". These comments are submitted in response to the public comment notice published in the Federal Register, Vol. 72, No. 141, dated July 24, 2007. You may contact us at this email address, if additional information is needed.

>
> Sincerely,
> Albert Garrett
> Sherri Cross

7/24/07

72 FR 40347

(1)

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1. Page 5, Section 2.1 Introduction, first sentence. Add the words “plans (to include the NRC approved security plans, emergency plans, and fundamental nuclear material control plans),” at the end of the sentence between the words “... site areas, SSCs,” and “... and procedures.”
2. Page 5, Section 2.1 Introduction, last sentence. Add the word “immediately” between the words “...prior to implementation, to” and “consider appropriate compensatory...”. Once an adverse action has occurred immediate compensatory measures should be taken.
3. Page 5, Section 2.2 Identify and Evaluate Safety/Security Significance Changes. Change the word “Significance” to “Significant” in the heading.
4. Page 5, Section 2.2 Identify and Evaluate Safety/Security Significance Changes, first sentence. Add the word “plans/” between the words “...to the facility or” and “procedures that ...”
5. Page 5, Section 2.3 Use Existing Controls and Processes, 1st ¶. Add the following to the end of the last sentence “; therefore, they may be adapted to assess and manage the potential for adverse safety and security interactions resulting from any changes to the existing configuration of these programs”.
6. Page 6, Section 2.4.1 Examples of Program Areas. Add the following two programs as bullets 10 and 11 to the list of bullets: “Transportation” and “Waste Operations”.
7. Page 7, Section 2.4.2 Examples of Potential Safety/Security Interfaces, 3rd full bullet on page. Reword the first part of the sentence to read: “Planned manual operator actions for fire protection to mitigate...”.
8. Page 7, Section 2.4.2 Examples of Potential Safety/Security Interfaces, last bullet on page. The word “blocks” in the first line should be singular, “block”.
9. Page 8, Section 2.5 Review of Changes in Plant Areas, 1st sentence. Add the word “plans,” between “...changes to site areas, SSCs,” and “and activities that could...”.
10. Page 8, Section 2.5 Review of Changes in Plant Areas, 3rd sentence. Add the words “or detects” between the words “...that interrupts” and “adversary access...”.
11. Page 8, Section 2.5 Review of Changes in Plant Areas, 4th sentence. Add the words “plans and” between the words “...site’s operational” and “procedures, and ...”.
12. Page 8, Section 2.5 Review of Changes in Plant Areas, last sentence. Add the words “, emergency response,” between the words “...safety functions” and “and performance to prevent...”.
13. Page 8, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 1st ¶: Add the sentence “Licensees should also consider whether changes would effect local law enforcement agency (LLEA) response.” between the first and second sentences.
14. Page 8, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 1st bullet, 2nd sentence. Add the words “authorized and” between the words “...and VA to detect” and “unauthorized activities.”.

15. Page 8, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 1st bullet, 6th sentence. Add the words “and to allow the security force to determine unauthorized activities from authorized activities.” to the end of the sentence that currently ends in the words “...assessment functions.”
16. Page 8, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 1st bullet, letter c. Add the words “and surveillance (CCTV)” after “Alarm assessment”.
17. Page 8, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 2nd bullet, 1st sentence. Add the word “channeling,” between the words “...by installing” and “barriers, locks, dispensable...”
18. Page 9, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 1st list. Add bullet “f. Exterior facility/building walls and doors” to the list of delay elements.
19. Page 9, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, 1st full bullet on the page. Add “(including LLEA responders)” before the colon at the end of the paragraph.
20. Page 9, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, sub-bullet a under 1st full bullet on the page. Add the words “and backup communications” to sub-bullet a.
21. Page 9, Section 2.6 Review of Changes Impacting Physical Protection Systems, Functions, and Performances, sub-bullet b under 1st full bullet on the page. Add the words “and LLEA response” to sub-bullet b.
22. Page 9, Section 2.7 Examples of Physical Protection System Performance, 1st bullet. Add the words “and LLEA” between the words “...security contingency” and “response or the evacuation...”.
23. Page 10, Section 2.7 Examples of Physical Protection System Performance, 1st bullet on page. Add the words “and surveillance” between the words “Availability of detection” and “systems to sense...”.
24. Page 10, Section 2.7 Examples of Physical Protection System Performance, 4th bullet on page. Add the text “, including LLEA communication and response” to the end of the bullet.
25. Page 10, Section 2.8 Implementing Management Controls or Processes, last sentence. Reword sentence to read “Established management controls or processes should provide a means for documenting and communicating the results to appropriate personnel (licensee and NRC, if applicable).”
26. Page 10, Section 2.9 Screening Questions for Safety, 1st ¶. End the second sentence after the words “...related regulatory requirements” and begin new last sentence that reads “These could be applied or adapted to meet the objective of identifying potential adverse interactions between security and safety activities.”

27. Page 10, Section 2.9 Screening Questions for Safety, 2nd ¶, 1st line. Change the word “effecting” to “affecting” and add the word “response” between the words “...emergency” and “plans in accordance...”
28. Page 10, Section 2.9 Screening Questions for Safety, 2nd ¶, 2nd line. Delete the word “in” and change the word “effect” to “effective”.
29. Page 10, Section 2.10 Screening Questions for Security, 1st ¶, 1st sentence. Add the words “implementing procedures” between the words “...site security plans,” and “and the bases...”.
30. Page 10, Section 2.10 Screening Questions for Security, 1st bullet. Change the word “systems” to “system” and add the words “elements or” between the words “...a security protection” and “system to perform...”.
31. Page 10, Section 2.10 Screening Questions for Security, 2nd bullet. Add the words “element or” between the words “...security protection” and “system performance...”.
32. Page 11, Section 2.10 Screening Questions for Security, 5th bullet on page. Add the words “or LLEA” between the words “...security response force” and “(personnel and/or...)”.
33. Page 11, Section 2.10 Screening Questions for Security, 6th bullet on page. Add the words “or LLEA” between the words “...capability of security” and “(personnel and/or...)”.
34. Page 11, Section 3.1 Frequency of Reviews and Audits. The reference to 10 CFR 73.55(g)(4)(i)(A) or (B) is applicable to the current regulation. In the proposed rule, the correct reference is 10 CFR 73.55(n)(1)(i) and (ii).

Additionally, this section is confusing as written. Reword the 3rd sentence to read “Licensees shall review the physical protection program on the following schedule:”. Change the sentence after the bullets to read “As specified in 73.55(n)(2)(ii), the effectiveness of the safety/security interface program must be reviewed at least every 24 months by individuals independent of those personnel responsible for program management and any individual who has direct responsibility for implementation of the onsite physical protection program.”

35. Page 12, Section 3.2 Reviews of Implementing Procedures, 1st sentence. Change the end of the sentence to read “...with the licensee’s safety and security programs.”