

NRCREP - Comments on DG 5021

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Notice of Opportunity for Comment on Draft Regulatory Guide DG-5021, Managing the Safety/Security Interface.

Questions or Comments:

As requested in the Draft Regulatory Guide, dated July, 2007, the Strategic Teaming and Resource Sharing (STARS) Alliance has the following comments on the Draft Regulatory Guide:

The draft regulatory guide provides guidance for managing the safety and security interface during activities that govern plant engineering modifications, plant work control and planning, plant procedure modifications and quality assurance program (See Section 2.3). The examples of potential safety and security interfaces provided in Section 2.4.2 suggest that operator actions to mitigate design basis accidents including fire safe shutdown should consider the potential delay in performing these actions due to security-initiated events (fourth bulleted example in this Section). This suggests that licensees need to consider in their design basis analysis the simultaneous occurrence of a security event with a design basis accident, which is beyond current licensing basis. The intent of this example should be clarified.

Due to the general nature of the statements and examples, STARS is concerned that the Regional and Resident Inspectors will read into the Regulatory Guide more than the Staff intended.

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