

[REDACTED]

**From:** Kevin Ramsey  
**To:** Michael Lamastra  
**Date:** 06/19/2007 4:25:16 PM  
**Subject:** Call w/NR re: SUNSI screening

I had a conference call with Kevin Krogh and Darren Rippentrop from Naval Reactors today. They have reviewed the "Quick Screening Process" that we provided and have the following comments:

1. Reviewers should receive training on the types of information that would be useful to an adversary. This is needed to answer Questions 5, 6, and 7.
2. It is unclear why Question 4 is limited to SNM greater than 1000 grams. For fuel facilities handling SNM, detailed information about the layout of facilities not visible from public areas should be withheld regardless of the quantity of SNM in the area. Adversaries can use the information to plan entry and exit routes. Information about the relationship of one site feature to another site feature is releasable if no reference points are provided that identify where normally unseen features are located within the facility.
3. Add a new question concerning detailed effluent information that would allow an adversary to derive the processes being conducted in the facility. Effluent reports (such as 70.59 reports) that list specific isotopes released from specific stacks or other specific locations should be withheld. General information about the maximum potential dose from all effluents may be released.
4. It was unclear that Question 2 was discussing natural uranium (not SNM). I explained that "uranium recovery" in Question 2 was different from how that term is used at fuel fab plants. We should consider clarifying that Question 2 concerns natural or depleted uranium only.
5. It is unclear how screeners are supposed to answer Question 6. We may want to add examples of information related to nearby facilities that is considered sensitive.

Public Affairs staff at Naval Reactors passed along a request by Hill staffers to be involved in discussions about revising the policy for withholding information. I agreed to pass the information along, but I said I don't expect to invite the Hill staffers to participate in our internal discussions.

**CC:** Amy Powell; Bill Gleaves; Joel Wiebe; Peter Habighorst

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**Subject:** Call w/NR re: SUNSI screening  
**Creation Date** 06/19/2007 4:25:16 PM  
**From:** Kevin Ramsey  
**Created By:** KMR@nrc.gov

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## DRAFT

June 2007

### QUICK SCREENING PROCESS FOR DETERMINING THE PRESENCE OF SECURITY-RELATED CONTROLLED UNCLASSIFIED INFORMATION IN FUEL CYCLE-RELATED DOCUMENTS

#### Purpose

The series of questions is designed to guide FCSS staff through a screening process to determine if a document contains any security-related information (SRI) that should be protected as sensitive unclassified non-Safeguards Information (SUNSI) - or SUNSI-SRI. NRC Classified Information Security and Safeguards information security must be handled in accordance with NRC Management Directive 12.1 thru 12-6.

#### Scope

This guidance relates only to information pertaining to domestic fuel cycle facilities regulated by the Nuclear Regulatory Commission.

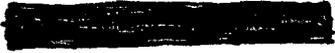
#### Background

The criteria upon which this screening process is based are found in NRC Regulatory Issue Summary 2005-031. Background information on the NRC's SUNSI protection policies can be found on the NRC Intranet web site. This page describes the background leading up to issuance of NRC RIS 2005-026, which pertains to nuclear power reactors, and the subsequent issuance of NRC RIS 2005-031, which addresses the protection of SUNSI-SRI in the materials arena. Both of these RISs reflected the Commission's goal of maintaining openness balanced against the goal of protecting information that could be exploited by terrorists.

#### Screening Process

This guidance assumes that the screener already will have read the document at least once and is sufficiently familiar with the content to be able to respond to the questions in the following guidance, relative to the nuclear material, design features, or other possibly sensitive information that is discussed in the document. .

At various junctures, the screener may be able to conclude that the document does or does not contain SUNSI-SRI. At such a juncture, a determination regarding the document's SUNSI-SRI status would be made and no further screening would be necessary.



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## DRAFT

### SUNSI Protection Requirements - Review

NRC-mandated requirements for the protection of SUNSI are located on the NRC Intranet at <http://www.internal.nrc.gov/sunsi/security.html>. Until a document is determined not to contain SUNSI-SRI, authors should handle their documents as if they do contain SUNSI-SRI.

### Screening Implementation

#### START

1. *What does the author of the document believe should be the categorization of the document?*

*If the author believes the document does not contain SUNSI-SRI, or the author is unavailable, complete an independent review as described below.*

*If the author believes the document does contain SUNSI-SRI, perform a search of the document to locate the portion the author believes makes the document SUNSI-SRI. If the author is correct, END SCREENING - Document is SUNSI-SRI.*

2. *Is the affected fuel cycle facility associated only with uranium recovery (yellow cake or tailings)?*

**Yes: END SCREENING – Document is NOT SUNSI-SRI – make document PUBLIC**

**No: Continue**

3. *Does the document contain information related to emergency planning, emergency response, Security plan, Safeguard plan for an active or inactive facility, an ISA or vulnerability study?*

**Yes: END SCREENING – Document is SUNSI-SRI - make document NON-PUBLIC and protect accordingly**

**No: Continue**

4. *Does the document give the exact location (e.g., detailed floor plans, room numbers, cabinets, etc.) of SNM greater than 1000 grams*
- [REDACTED]

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**Yes: END SCREENING – Document is SUNSI-SRI - make document NON-PUBLIC and protect accordingly**

**No: Continue**

5. Does the document include process information that could potentially allow an adversary to gain
- (1) Access to radioactive or hazardous materials; or
  - (2) Knowledge of detailed information or potential weaknesses of systems designed to ensure safe operations (necessary to prevent or mitigate accidents) at fuel cycle facilities?

**Yes: END SCREENING – Document is SUNSI-SRI - make document NON-PUBLIC and protect accordingly**

**No: Continue**

6. Does the document contain information related to facilities near the subject licensed facility that might reasonably be considered helpful to those who might plan an attack.?

**Yes: END SCREENING – Document is SUNSI-SRI - make document NON-PUBLIC and protect accordingly**

**No: Continue**

7. Does the document contain information from assessments that include descriptions of structural features that are central to potential malevolent attacks?

**Yes: END SCREENING – Document is SUNSI-SRI - make document NON-PUBLIC and protect accordingly**

**No: END SCREENING – Document is NOT SUNSI-SRI**