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Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attn: Rulemaking, Directives and Editing Branch

Subject: **Comments on Draft Regulatory Guide DG-5015, Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities, 73 FR 2435 (January 15, 2008)**

As a member of the Nuclear Energy Institute (NEI), Southern California Edison (SCE) is actively involved in the nuclear power industry's role in meeting new nuclear power reactor security initiatives. SCE endorses the comments on the subject draft Regulatory Guide to be submitted by NEI on or about February 25, 2008.

SCE also offers its own comments contained in the enclosure to this letter. These provide SCE's insights on the practical effects that the draft Regulatory Guide poses to power reactor licensees.

Thank you for the opportunity to comment on the draft Regulatory Guide. If there are any questions on SCE's submittal, please contact me or Mr. D. F. Pilmer at (949) 368-6136.

Sincerely,

Enclosure: Comments on draft Regulatory Guide DG-5015
by Southern California Edison

SUNSE Review Complete

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EREDS-ADM-03

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**Comments by Southern California Edison
On Draft Regulatory Guide DG-5015
*Training and Qualification of Security Personnel at Nuclear Power
Reactor Facilities***

1. General Comment:

Discussion: The draft DG-5015 was not withheld from the public, yet the Training and Qualification Plans are required to be designated as Safeguards Information (SGI). However, the draft Regulatory Guide contains much more detailed information than does the existing Training and Qualification Plans.

Recommendation: The NRC should allow licensees to decontrol their Training and Qualification Plans so that the plans can more easily be used.

2. Issue: Chapter 2, Page 7: Employment Suitability and Qualification

Discussion: The proposed Chapter 2 wording, which is intended to support the proposed Part 73 Appendix B, B.1.b, adds the phrase "A **qualified training instructor** must document...." This blanket addition located throughout the proposed changes to both Appendix B and draft Regulatory Guide DG-5015 will create an undue administrative burden and add additional cost because processes overseen by other organizations (e.g., Human Resources, Access Authorization, and Medical organizations) and attested by a security supervisor would require a qualified training instructor's involvement. For example, SONGS training instructors are not currently involved in the Suitability Determination part because it is a pre-employment process handled by Human Resources and Access Authorization and confirmed/attested by security management. Another example would be the physical fitness test (PFT), which is given by and documented by qualified medical professionals and attested to by a security supervisor. The phrase "documented by a qualified training instructor" implies that the instructors will also have to monitor and document each aspect of the Suitability Determination. This will result in the need for more instructors and cost to the industry without corresponding value.

The proposed Part 73 Appendix B, B.1.b wording was placed under the B.1, "Suitability" section, yet it appears to be much more encompassing than just for the Suitability Determination as it implies that all qualifications "...must be documented by a qualified training instructor and attested to by a security supervisor."

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals cannot be generated other than to restore the wording to that in the existing Appendix B, I.C. The proposed change actually creates a regulatory gap where none existed before.

Reference: The proposed Part 73 Appendix B, B.1.b states, “The qualification of each individual to perform assigned duties and responsibilities must be documented by a qualified training instructor and attested to by a security supervisor.”

The draft Regulatory Guide DG-5015, Chapter 2 states, “A qualified training instructor must document this record, and a security supervisor must attest to it.”

Recommendation: Restore the proposed Part 73 Appendix B, B.1.b wording to that in the existing Appendix B wording as follows, “The suitability qualifications of each individual must be documented and attested by a licensee security supervisor.” Relocate the last sentence in DG-5015, Chapter 2 to Section 2.1 and modify as recommended above.

3. Issue: Section 2.4, Page 9: Vision and Hearing

Discussion: The proposed Section 2.4 implies that security training personnel shall evaluate whether or not a person’s vision defect or hearing loss is acceptable. If a licensed health professional “shall” document and assess the results of the evaluation, with a licensed physician making the final determination, then there is no need to have a security training personnel or security supervisor perform an evaluation before hand. Every officer currently is tested for hearing and receives a vision test at SONGS. Training instructors and supervisors are not as well qualified to identify a deficiency than the trained medical staff.

Reference: The proposed Section 2.4 states, “Security training personnel and a security supervisor should perform this evaluation, which is designed to ascertain that the individual in question can correctly recognize critical objects, such as traffic control devices, emergency signs, radiation barriers, and alarm indicators for security equipment and barriers.”

Recommendation: Revise the last paragraph in Section 2.4 to read, “Personnel who exhibit a mild color vision defect or minor hearing loss may be subject to an on-the-job evaluation. ~~Security training personnel and a security supervisor should perform this evaluation, which is designed to ascertain that the individual in question can correctly recognize critical objects, such as traffic control devices, emergency signs, radiation barriers, and alarm indicators for security equipment and barriers.~~ Consistent with Appendix B to 10 CFR Part 73, Section VI, paragraphs B.1.b and B.2.a.(3), a licensed health professional shall document and assess the results of the evaluation, with a licensed physician making the final determination.”

4. Issue: Section 2.9, Page 10: Medical Examination and Physical Fitness Test

Discussion: The proposed Section 2.9 implies that regardless of how the physical fitness test (PFT) is simulated, it “should include strenuous activities or physical exertion such as running, climbing stairs, and lifting heavy objects.” Even though the word “simulate” is used several times, the wording above implies that the PFT must include running, climbing stairs, and lifting heavy objects. This would result in a significant burden on licensees. For example, at SONGS, and due to personnel injury concerns, the PFT was developed by Human Performance Systems, Inc. in May 2004, where such strenuous activities were evaluated and an in-office PFT program developed based on treadmill VO₂, sit-ups, and arm ergometer criteria. The current PFT which was developed based on the possible tasks armed officers may be called upon to perform. The current treadmill exam requires rapid walking up a steep hill during the last 2 minutes and 15 seconds. It requires some agility, as well as aerobic capacity, to perform the treadmill test. The arm ergometer tests upper body strength and endurance, and the sit ups test core body strength--all of which are required to lift heavy objects.

Reference: The proposed Section 2.9 states, “This should include strenuous activities or physical exertion such as running, climbing stairs, and lifting heavy objects.”

Recommendation: Modify the proposed Section 2.9 wording to state, “This PFT simulation elements should equate to include strenuous activities or physical exertion such as running, climbing stairs, and lifting heavy objects.”

5. Issue: Section 2.9, Page 10: Medical Examination and Physical Fitness Test

Discussion: The proposed Part 73, Appendix B, paragraph B.4.b.(2), as reflected in the second paragraph of Section 2.9 of the draft DG-5015, indicates that the PFT must be described in the Training and Qualification Plan. However, as worded in the draft DG-5015, the NRC guidance implies that the Training and Qualification Plan description must include the physical attributes and performance objectives that demonstrate the strength, endurance, and agility required. This goes well beyond the current NEI 03-12 template wording and will first require a change to the NEI template followed by changes to each licensee’s Training and Qualification Plans. As such, this would be a significant burden to both the industry and NRC, and would prohibit future changes to the Security Plans without first receiving NRC approval.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals cannot be generated other than to restore the wording to that in the existing Appendix B, I.C, which does not require describing the licensee’s specific program in the Training and Qualification Plan. The proposed change actually creates a regulatory gap where none existed before.

Reference: The proposed Part 73 Appendix B, B.4.b.(2) states, “The licensee shall describe the physical fitness test in the Commission-approved training and qualification plan.”

The draft Regulatory Guide DG-5015 states, “In accordance with Appendix B to 10 CFR 73, Section VI, paragraph B.4.b.(2), the licensee must describe the physical fitness test to be used in its Commission-approved training and qualification plan. To satisfy Section VI, paragraph B.4.c.(3), of Appendix B, this description must include the physical attributes and performance objectives that demonstrate the strength, endurance, and agility required of the individual to effectively perform the assigned security-related duties.”

Recommendations: Modify the proposed Part 73 Appendix B, B.4.b.(2) to state, “The licensee shall describe the physical fitness test in facility procedures.”

Modify the draft Regulatory Guide DG-5015 wording to state, “In accordance with Appendix B to 10 CFR 73, Section VI, paragraph B.4.b.(2), the licensee must describe the physical fitness test ~~to be used in its Commission-approved training and qualification plan~~ in facility procedures. To satisfy Section VI, paragraph B.4.c.(3), of Appendix B, this facility procedure description must include the physical attributes and performance objectives that demonstrate the strength, endurance, and agility required of the individual to effectively perform the assigned security-related duties.”

6. Issue: Section 2.9, Page 10: Medical Examination and Physical Fitness Test

Discussion: The last paragraph fails to specifically note the requirement from Appendix B to 10 CFR 73, Section VI, paragraph B.4.b.(4) that the PFT must be documented by a qualified training instructor and attested to by a security supervisor, as was done elsewhere in the draft DG-5015. In that regard, Comment #1 above applies. It also misquotes the proposed Rule because paragraph B.4.b.(4) does not address records retention.

Reference: The proposed Part 73 Appendix B, B.4.b.(4) states, “The physical fitness qualification of each armed member of the security organization must be documented by a qualified training instructor and attested to by a security supervisor.”

The draft Regulatory Guide DG-5015, Section 2.9 states, “In accordance with Appendix B to 10 CFR 73, Section VI, paragraph B.4.b.(4), the licensee is required to document each individual’s physical fitness qualification and retain this documentation in accordance with Commission requirements.”

Recommendations: Modify the proposed Part 73 Appendix B, B.4.b.(4) to state, “The physical fitness qualification of each armed member of the security organization must be ~~documented by a qualified training instructor and~~ attested to by a security supervisor.”

Modify the draft DG-5015, Section 2.9 wording to state, “In accordance with Appendix B to 10 CFR 73, Section VI, paragraph B.4.b.(4), the licensee is required to ~~document~~ attest to each individual’s physical fitness qualification and retain this documentation in accordance with Commission requirements.”

7. Issue: Section 3.1, Page 11: Security Personnel Training

Discussion: As worded, the draft DG-5015 implies that all bulleted items must be specifically identified in the Training and Qualification Plan. However, the Training and Qualification Plans only identify the critical tasks developed using the Systematic Approach to Training (SAT) methodology provided in NEI 03-09, “Security Officer Training Program,” Revision 2, dated April 2004, in the critical task matrix in Table 1. Each critical task listed has a general description of the purpose for the critical task, *e.g.*, ensure the officer can perform administrative tasks associated with the conduct of security operations in accordance with station procedures. However, the actual knowledge, skills, and abilities required to perform that task are documented in structured lesson plans in accordance with the SAT program, not in the Training and Qualification Plan. To put such information into the Security Plan would first require a change to the NEI template NEI 03-12, followed by changes to each licensee’s Training and Qualification Plan. This would result in a significant burden to both the licensee and NRC.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals cannot be generated other than to restore the wording to that in the existing Appendix B, II.C, which does not require describing the licensee’s specific program in the Training and Qualification Plan. The proposed change actually creates a regulatory gap where none existed before.

Reference: The proposed Part 73 Appendix B, C.1.a states, “The areas of knowledge, skills, and abilities that are required to perform assigned duties and responsibilities must be identified in the licensee’s Commission-approved training and qualification plan.”

The draft Regulatory Guide DG-5015, Section 3.1 states, “To satisfy Appendix B to 10 CFR 73, Section VI, paragraph C.1.a, the licensee must identify in the licensee’s Commission-approved training and qualification plan those areas of knowledge, skills, and abilities required by security personnel to carry out their assigned duties and responsibilities and should account for them in the site-specific security training program for security personnel.”

Recommendations: Modify the proposed Part 73 Appendix B, C.1.a to state, “The areas of knowledge, skills, and abilities that are required to perform assigned duties and responsibilities must be identified in the site-specific security training program for security personnel ~~the licensee’s Commission-approved training and qualification plan.~~”

Modify the draft DG-5015, Section 3.1 wording to state, ““To satisfy Appendix B to 10 CFR 73, Section VI, paragraph C.1.a, the licensee must identify ~~in the licensee’s Commission-approved training and qualification plan~~ those areas of knowledge, skills, and abilities required by security personnel to carry out their assigned duties and responsibilities and ~~should~~ account for them in the site-specific security training program for security personnel.”

8. Issue: Section 3.1.1, Page 12: Critical Tasks

Discussion: The Section 3.1.1.b, as worded, implies that visitor control is required at the owner-controlled area (OCA) boundary the same as at the PA boundary. Also, the phrase “visitor control register” implies hard copy records. Many licensees maintain such information in a controlled access authorization database.

Reference: The draft DG-5015 Section 3.1.1.b states the following:

b. Visitor Access Control

Verify visitor identification through physical presentation of an identification card issued by a recognized local, State, or Federal Government agency that includes a photo or describes the physical characteristics of the individual. Confirm, in accordance with industry lists and databases, that individuals have not been denied access at another site. Determine access authorization for entry to the facility in accordance with site procedures. Assign the visitor an appropriate badge and/or key card. Ensure that an escort, who is aware of escort responsibilities, is present before the visitor enters the protected area in accordance with site procedures. The licensee is responsible for documenting and maintaining visitor information in a visitor control register, which includes visitor name, date, time, purpose of visit, employment affiliation, citizenship, and name of the individual to be visited, before the visitor is escorted into any protected or vital area.

Recommendation: Clarify the proposed Section 3.1.1.b as follows:

b. Protected Area Visitor Access Control

Verify visitor identification through physical presentation of an identification card issued by a recognized local, State, or Federal Government agency that includes a photo or describes the physical characteristics of the individual. Confirm, in accordance with industry lists and databases, that individuals have not been denied protected area access at another site. Determine access authorization for entry to the facility protected area in accordance with site procedures. Assign the visitor an appropriate badge and/or key card. Ensure that an escort, who is aware of escort responsibilities, is present before the visitor enters the protected area in accordance with site procedures. The licensee is responsible for documenting and maintaining visitor information in a visitor control register or database, which includes visitor

name, date, time, and purpose of visit, employment affiliation, citizenship, and name of the individual to be visited, before the visitor is escorted into any protected or vital area.

9. Issue: Section 3.1.1, Page 13: Critical Tasks

Discussion: The Section 3.1.1.f, as worded, implies that the vehicle search requirements noted are applicable at the owner-controlled area (OCA) boundary as well as for PA entry. However, neither vehicle escorts nor vehicle information documentation are required for OCA entry

Reference: The draft DG-5015, Section 3.1.1.f states the following:

f. Vehicle Search

Verify or obtain access authorization; complete the vehicle search requirements; document appropriate information pertaining to the vehicle before entry; ensure that all vehicle occupants satisfy the search requirement before entry; and determine the need for an escort and complete the vehicle entry requirements to include situations that involve Commission-approved exceptions in accordance with approved site security plans and implementing procedures.

Recommendation: Clarify the proposed Section 3.1.1.b as follows:

f. Protected Area Vehicle Search

Verify or obtain access authorization; complete the vehicle search requirements; document appropriate information pertaining to the vehicle before entry; ensure that all vehicle occupants satisfy the search requirement before authorizing protected area entry; and determine the need for an escort and complete the vehicle entry requirements to include situations that involve Commission-approved exceptions in accordance with approved site security plans and implementing procedures.

10. Issue: Section 3.2, Page 16: Training of Facility Personnel

Discussion: Section 3.2 needs clarification as to the applicability of the sentence: “This training should include general training for employees who would assist an employee taken as a hostage.”

Reference: The draft DG-5015, Section 3.2 states, “In addition, appropriate facility personnel should be periodically trained in their responsibilities in responding to a hostage or duress situation. This training should include general training for employees who would assist an employee taken as a hostage.”

Recommendation: Reword the proposed Section 3.2 to state, “In addition, appropriate facility personnel should be periodically trained in their responsibilities in responding to a hostage or duress situation. This training should be included in general training or other specialized training, as appropriate, for employees who may have to respond to would assist an employee taken as a hostage or duress situation.”

11. Issue: Chapter 4, Page 17: On-the-Job Training

Discussion: The section lists minimum training time frames, *e.g.*, minimum 40 hours, minimum 24 hours, without a supporting basis. It should be left up to the individual sites to determine minimum training time requirements in accordance with the committed SAT program.

Reference: The draft DG-5015, Chapter 4 states, in part, “Before assignment of normal security duties, it is recommended that the training and qualification program include a minimum of 40 hours of OJT for the following duty positions:… Watch persons who will be trained and qualified as members of the security organization should receive a minimum of 40 hours of OJT for normal duties. Facility personnel who perform specific security duties should receive a minimum of 24 hours of OJT for their assigned security duties.”

Recommendation: Reword the proposed Chapter 4 to state, in part, “Before assignment of normal security duties, it is recommended that the training and qualification systematic assessment of training (SAT) program evaluate the include a minimum of 40 hours of OJT needed for the following duty positions:… Watch persons who will be trained and qualified as members of the security organization should receive a minimum of 40 the same number of OJT training hours of OJT as for normal security duties. For fFacility personnel who perform specific security duties, it is recommended that the training and qualification SAT program also evaluate the should receive a minimum of 24 hours of OJT needed for their assigned security duties.”

12. Issue: Section 4.5, Page 19: OJT Checklist

Discussion: The proposed draft DG-5015, Section 4.5, introduces the phrase “OJT Checklist.” For most security applications, the term ‘checklist’ implies a stand alone document. For SONGS, the knowledge, skills, and abilities are built into each Personnel Qualification Standard (PQS); not in a separate “checklist.”

Reference: Draft DG-5015, Section 4.5, states, the following:

4.5 OJT Checklist

An OJT checklist should be created that identifies the critical elements associated with each critical task for the knowledge, skills, and abilities required to perform the

duties and responsibilities of all duty positions. A duty position may comprise multiple critical tasks and elements, and its description should indicate the appropriate level of knowledge standard required for each element and task. The checklist should also have an area identified to log time associated with the performance of OJT to ensure that the trainee has met the program minimum OJT time (40 hours).

Recommendation: Reword the proposed Section 4.5 to state, the following:

4.5 OJT Checklist Documentation

An OJT checklist document should be created that identifies the critical elements associated with each critical task for the knowledge, skills, and abilities required to perform the duties and responsibilities of all duty positions. A duty position may comprise multiple critical tasks and elements, and its description should indicate the appropriate level of knowledge standard required for each element and task. The checklist document should also have an area identified to log time associated with the performance of OJT to ensure that the trainee has met the program minimum OJT time (40 hours).

13. Issue: Chapter 5, Pages 19-30: Tactical Response Drills and Force-on-Force Exercises

Discussion: The proposed draft DG-5015, Chapter 5, appears to copy NEI 03-09, "Security Officer Training Program," as committed to in each licensee's Training and Qualification Plans. In placing this in an NRC Regulatory Guide, the usefulness of having an Industry standard is defeated. It would be more appropriate to reference the NEI document as meeting the NRC's endorsement and as providing appropriate guidance.

Reference: NEI 03-09, "Security Officer Training Program," Revision 2, dated April 2004.

Recommendation: Remove the Chapter 5 contents and reference the guidance provided in NEI 03-09.

14. Issue: Chapter 6, Page 30: Duty Qualification and Requalification

Discussion: As worded, it is not clear what was intended by the phrase, "...shall ensure that the training and qualification program is included in the site corrective action program." This could be interpreted as meaning that training programs are defective and therefore must be addressed in the corrective action program.

Reference: The draft DG-5015, Chapter 6 states, “The licensee shall ensure that the training and qualification program is included in the site corrective action program.”

Recommendation: Reword Chapter 6 to state, “The licensee shall ensure that deficiencies identified by the training and qualification program ~~is~~are included in the site corrective action program.”

15. Issue: Section 6.4, Page 33: Requalification

Discussion: As worded, the last sentence would require a qualified training instructor to document all training, qualification, and requalification. As noted in an earlier comment, this would place a significant burden on licensee resources.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals cannot be generated other than to restore the wording to that in the existing Appendix B. The proposed change actually creates a regulatory gap where none existed before.

Reference: The draft DG-5015, Section 6.4 states, “Qualified training instructors shall document all training, qualification, and requalification, and a security supervisor shall attest to the documentation.”

Recommendation: Reword Section 6.4 as follows: “~~Qualified training instructors shall document all training, qualification, and requalification, and a security supervisor shall attest to the documentation.~~ Typically, qualified security training instructors/field training officers (FTOs) and/or subject matter experts (SMEs) designated by the security training staff conduct/document the requalification training. A qualified security supervisor must attest to all requalification training, and the records must be retained in accordance with 10 CFR 73.70, ‘Records.’”

16. Issue: Section 7.3.3, Pages 34-35: Combat Firing

Discussion: The draft wording in Section 7.3.3 sounds as though licensees will need to institute a program that categorizes shooters, i.e. 1st class, 2nd class etc., based on their skill levels. This would result in a complexity well beyond the protective strategy needs.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals should not be generated. The proposed change actually creates a regulatory gap where none existed before.

Reference: The draft DG-5015, Section 7.3.3 states, in part, “The skill level of those who will be participating should be considered in the development of advanced training. More important, when conducting this type of weapons training, the skill levels of all

shooters participating should be closely monitored to ensure that the training is commensurate with the skill levels demonstrated by the participants and to ensure overall safety.”

Recommendation: Reword Section 7.3.3 as follows:

“Weapons operators in combat or contingency situations should possess skills in weapons operations, marksmanship, and tactics, which enable success and survivability. The programmatic format for the training to develop these skills should be based on a consistent, progressive approach. Once overall basic proficiency has been established, shooters should be challenged with more progressive and demanding training to advance their proficiency levels. ~~The skill level of those who will be participating should be considered in the development of advanced training. More important, when conducting this type of weapons training, the skill levels of all shooters participating should be~~ closely monitored to ensure that the training is commensurate with the skill levels demonstrated by the participants and to ensure overall safety. The goal of this type of weapons training should be to achieve a level of conditioning that provides the weapons operator the ability to perform and function successfully without hindering the cognitive thought process, much like “multitasking.” The ability to multitask in combat situations supports the ability of a force to gain, regain, and maintain the initiative during a contingency-related event. Training that addresses combat firing should also focus on the weapons operator’s ability to identify the opportunities that exist in the combat/contingency environment and to take decisive and effective advantage of them.”

17. Issue: Section 7.3.3, Page 35: Combat Firing

Discussion: The draft wording in Section 7.3.3 implies that shooting while moving should be included in the tactical course of fire. For SONGS, the range is located at the U. S. Marine Corps Base Camp Pendleton where shooting while moving is not allowed. Only certain ranges are qualified to allow shooting while moving. To requalify our existing range would be difficult, if not impossible. For shooting while moving, Camp Pendleton requires the wearing of helmets and body armor (military style helmet and flack jacket), along with additional distance-to-target shooting restrictions. Of course that would directly contradict the NRC’s goal of having all personnel shoot familiarization and evaluation courses of fire wearing the exact duty gear required by site-specific instructions for duty and tactical responses. To meet the existing range regulations, our tactical course of fire is designed to move, stop and fire, then continue moving.

Reference: The draft DG-5015, Section 7.3.3 states, in part, “Training for combat firing should include exercises that develop individual as well as team proficiency. Training that specifically addresses combat firing should include, but is not limited to, the following aspects:

– shooting while moving (advancing, evading, and lateral movement)....”

Recommendation: Reword Section 7.3.3 as follows:

“Training for combat firing should include exercises that develop individual as well as team proficiency. Training that specifically addresses combat firing should include, but is not limited to, the following aspects:

– shooting while moving if range regulations allow (advancing, evading, and lateral movement)....”

18. Issue: Section 7.3.6, Page 37: Zeroing Weapons and Weapons Sighting Adjustments

Discussion: Section 7.3.6, as worded, implies that all security officers would need to actually adjust their weapon for wind and elevation changes. Teaching the basic understanding of how to adjust the windage and elevation on all weapons is not the issue. Performing the basic zeroing is the issue. At plants where individual officers are assigned weapons this might make sense, but with a force the size of SONGS, where we use generic weapons, this doesn't make sense. This would add an enormous amount of time to each range and in a plant where we have generic weapons would serve no valid purpose.

The benefit of instructing and qualifying officers on sight adjustment is outweighed by the lack of value that it would add to in this process. It is currently a rare occasion when a rifle's sights need to be readjusted during range firing. If required, then an instructor or armorer will verify and adjust the sight as necessary. This would be the only instance of sight adjustments. During a contingency situation, one would not be making sight adjustments during a firefight.

Reference: Section 7.3.6 states, in part, “Firearms training programs should include instruction for all personnel to understand and perform the basic zeroing of all weapons and the adjustment of weapon sighting mechanisms.”

Recommendation: Reword Section 7.3.6 to state, “Firearms training programs should include instruction for all personnel to understand ~~and perform~~ the basic zeroing of all weapons and the adjustment of weapon sighting mechanisms. Some weapons do not allow a shooter to manually perform zeroing without specialized tools. Operators with weapons that have sighting systems that a shooter can manipulate should have a basic understanding of how to adjust the windage and elevation on all devices. Sighting systems should be inspected daily to ensure that they are operable (e.g., front/rear sights not bent or broken, glass in-scope-type systems not cracked, batteries replaced if needed, night sights illuminate, sighting systems mounted properly and not loose) using appropriate safety rules for weapons handling.

19. Issue: Section 7.4, Page 39: Use of Force

Discussion: Section 7.4, as worded, appears to imply that licensees should train officers on how to retain their weapon in a hand to hand or when apprehending. The likelihood of needing this type training can not be justified because of the SONGS configuration and protective strategy.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals should not be generated. The proposed change actually creates a regulatory gap where none existed before.

Reference: Section 7.4 states, in part, “In addition, the NRC has determined that to enhance officer safety, each member of the security organization should receive instruction regarding the physiological and psychological effects on the human body during intense or life-threatening situations and that armed security personnel should receive detailed and recurring training in weapon retention techniques.”

Recommendation: Reword Section 7.4 to state, “In addition, the NRC has determined that to enhance officer safety, each member of the security organization should receive instruction regarding the physiological and psychological effects on the human body during intense or life-threatening situations ~~and that armed security personnel should receive detailed and recurring training in weapon retention techniques.~~”

20. Issue: Section 7.6.2, Page 41: Firearms Qualification Courses

Discussion: The proposed Section 7.6.2 wording implies that once your course of fire had been developed, it cannot be modified. The day course for SONGS is based on an NRA approved course of fire, and the night course is based on 10 CFR 73, Appendix H. However, the tactical course was developed internally to meet the SONGS protective strategy and NRC guidance. The statement “such courses may not be modified,” is a broad term with no examples of what “modification” would constitute. Section 7.6.2 needs to clarify that this does not apply to tactical courses of fire. It also needs to clarify that modifications that enhance the approved course of fire would be acceptable (i.e., as long as the elements of the approved course-of-fire are retained).

Reference: Section 7.6.2 states, in part, “The licensee may use current qualification courses developed and certified by the above-listed entities; however, such courses may not be modified.”

Recommendation: Reword Section 7.6.2 to state, “Once designed, licensees should submit their qualification courses, excluding the tactical course-of-fire, to the recognized entity for certification before the courses are implemented. The licensee may use current qualification courses developed and certified by the above-listed entities. ~~; however,~~ Such courses may not be modified as long as the approved course content is not

diminished. When using the qualification courses that have been developed and certified by the recognized entity, the weapons operating system shall be similar to that for which the course was designed (i.e., a revolver course shall not be used to qualify operators on the use of a semiautomatic handgun).”

21. Issue: Section 7.6.4, Page 43: Semiautomatic Rifle

Discussion: The proposed Section 7.6.4 wording implies a ratio of three shooters to one instructor should be used. SONGS does not have the manpower to have one instructor for every three shooters without on shift support. Due to the size of the security force and, at times, training at four different locations on the same day, SONGS would either need shift support or reduce the number of people on the firing line at one time. The net effect would reduce the practice and training time each officer currently has on the range.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals should not be generated. The proposed change actually creates a regulatory gap where none existed before.

Reference: Section 7.6.4 states, in part, “Firearms instructors should follow a standard ratio of one instructor for every three shooters during reduced-light range activities.”

Recommendation: Reword Section 7.6.4 to state, “Control of range activities during reduced lighting is critical for the overall safety of all personnel. Firearms instructors should consider policies and procedures for using lighting devices to identify themselves, as well as shooters, during reduced-light training. Flashlights with red filters or chemical sticks could be used to provide the identification needed. Firearms instructors should consider the preservation of all personnel’s night vision when using these lighting devices. If possible, fFirearms instructors should follow a standard ratio of one instructor for every three shooters during reduced-light range activities.

22. Issue: Section 8.3.1.a, Page 55: Semiannual Test Firing for Accuracy and Functionality

Discussion: The proposed Section 8.3.1.a wording implies that at a minimum, 10 rounds are required to determine weapon functionality. A three-shot group will satisfy the functionality, reliability and accuracy in the same manner as a ten-shot group without the added cost of additional ammunition. SONGS’ firearms are designed and manufactured to operate in a wide range of temperatures. At our location, the extreme range of temperatures does not exist.

Reference: Section 8.3.1.a states, in part, “The semiannual test fire should include the discharge of 10 or more rounds, at a minimum, to determine the functionality, reliability, and accuracy of each weapon.”

Recommendation: Reword Section 8.3.1.a to state, “The semiannual test fire should include the discharge of ~~40~~ three or more rounds, at a minimum dependent on environment conditions, to determine the functionality, reliability, and accuracy of each weapon.”

23. Issue: Section 8.3.1.b, Page 56: Firearms Maintenance and Cleaning Schedule

Discussion: The proposed Section 8.3.1.b wording implies that a monthly cleaning schedule should be implemented. Currently, SONGS issued firearms are cleaned quarterly after range activities. Non-issued firearms are inspected and cleaned as necessary. Firearms are also cleaned on an as-needed basis. Additionally, rifles that are exposed to the elements are rotated out and cleaned weekly. Cleaning of every firearm on a monthly basis as suggested would incur significant man-hours. It should be up to the Facility to create a cleaning program suitable to their environment etc.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals should not be generated. The proposed change actually creates a regulatory gap where none existed before.

Reference: Section 8.3.1.b states, in part, “A monthly cleaning schedule should be implemented to ensure that all licensee firearms are maintained in a reliable operating condition.”

Recommendation: Reword Section 8.3.1.b to state, “A ~~monthly~~ cleaning schedule should be implemented to ensure that all licensee firearms are maintained in a reliable operating condition.”

24. Issue: Section 8.3.1.d, Page 57: Accountability (Weapons and Ammunition)

Discussion: The proposed Section 8.3.1.d wording implies that licensees should account for all in-service and out-of-service firearms and ammunition every shift. Currently, all firearms and ammunition are accounted for daily by each shift. This is a sufficient accountability and increasing this would incur significant additional man-hours due to the number of weapons we have.

The current basis for the change does not identify a performance or regulatory gap, so alternate proposals should not be generated. The proposed change actually creates a regulatory gap where none existed before.

Reference: Section 8.3.1.d states, in part, “Licensees should account for all inservice and out-of-service firearms once each shift...Licensees should account for all protective strategy ammunition once per shift.”

Recommendation: Reword Section 8.3.1.d to state, “Licensees should account for all in-service and out-of-service firearms at least daily ~~once each shift~~...Licensees should account for all protective strategy/duty ammunition at least daily ~~once each shift~~.”