U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

Report of the Independent External Review Panel

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Overview

- 7 meetings
- Federal Advisory Committee Act
- Opportunity for public input
- Stakeholder participation and comment
- Staff cooperation

Security

Benjamin W. Nerud

Culture of Security

- **Incorporate security into the culture of NRC and Agreement States**
  - **Focus on health, safety, and environmental protection**
  - **Security must have equal consideration**

Security Strategy

- **Three types of countermeasures provide full spectrum of protection from adversary**
  - **Affect the behavior**
  - **Affect the operational capability**
  - **Limit courses of action available**

Recommendation 1a

- **Suspend "good faith presumption" until a record of credible performance is established**

Recommendation 1a

- **For "new applicants" specific recommended actions include:**
  - On-site visits to all licensed locations
  - Plans and procedures tailored to operation
  - Background investigations of key personnel
  - Requested materials comport with planned activities

Recommendation 1b

- Develop a process and establish criteria to allow recognition of new licenses as having a record of credible performance leading to establishment of trust

Recommendation 2

- **Include licensing guidance in current NRC Operational Security Program**
  - Exploitable information
  - Benefits of release
  - Measures to safeguard and control

Recommendation 4

- **Develop detailed physical security standards using risk-informed, graded approach**
  - Identify threats
  - Determine appropriate actions
  - Implement protective measures

Recommendation 8

- **Re-evaluate pre-licensing guidance**
  - Eliminate "good faith presumption"
  - Rely on on-site visits for verification

Web-based Licensing and National Source Tracking System (WBL/NSTS)

Michael T. Ryan

Recommendation 3a

- **Integrate Web-based Licensing and National Source Tracking Systems**
- **Goal: real-time tracking of risk-significant sources**
- **Specific features for licensees and vendors**
- **A single system for NRC and Agreement States**

Recommendation 3b

- Until the system is available, all licenses governing transfers of risk-significant sources should be verified

- Where trust has been established, exceptions could be considered

Recommendation 3c

- **Develop and test system**
- **Involve Agreement States in development**
- **Plan rollout and implementation**

Recommendations 3 a, b, & c

- Respond directly to the vulnerability identified in GAO report
- Provide a risk-informed response to the vulnerability

Other Recommendations

Thomas E. Hill

Recommendation 5a

- Incorporate security into culture of NRC and Agreement State licensing programs

Recommendation 5b

- **Provide tools and training for making risk-informed licensing decisions**
  - **Threat awareness program**
  - **Investigation of suspicious applications**
  - **Information management databases**

Recommendations 6 a & b

- **Office of International Programs should follow Recommendation 1**
  - Increased review for first-time import/export applicants
- **Importers and exports under General Licenses should use WBL/NSTS system when available**

Recommendation 7

- **Continue to encourage "as needed" possession limits**
  - **Approximately 10 percent of licenses do not have upper bounds on possession limits**
  - **Exclusions may apply to 10 CFR 35.100, 200, and 300 uses**

Questions/Comments

- Thank you for your time
- We are happy to take your questions

Acronyms Used

- **NSTS – National Source Tracking System**
- **WBL – Web-based Licensing**