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Security Inspection and Security Performance Assessment of NRC Licensees

Comment On: NRC-2008-0413-0001
Possible Improvements to the Level of Openness and Transparency of Information Associated With NRC Security Inspection and Security Performance Assessment of NRC Licensees

Document: NRC-2008-0413-DRAFT-0001
Comment on FR Doc # E8-17324

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Comment

Thank you for the opportunity to comment on this important NRC initiative. It represents a welcome acknowledgment of public interest in NRC security policy, and of public capacity to contribute to policy formulation.

In response to some of the questions posed in the Federal Register Notice, I want to submit the following comments.

1. I would favor the routine release of power plant Updated Final Safety Analysis Reports (UFSARs) to support public deliberation over plant safety and security policy. I believe that release of these documents has been recommended by the Union of Concerned Scientists, and I would second that recommendation.

2. Any and all methods of public disclosure may be appropriate depending on circumstances. As a baseline, online publication through the NRC website is probably the most effective and easily accessible, though it may be usefully

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supplemented by other modes of presentation.

3. The reasons for public disclosure of security information include a desire by some members of the public to form an independent evaluation of licensee performance, and of NRC regulatory performance, on security policy. As a general rule, openness and candor tend to build public confidence while secrecy tends to generate suspicion. Even those members of the public (the majority) who are not concerned with security policy may be reassured by the fact that members of the press, watchdog groups, and others are at liberty to scrutinize licensee and Commission performance and to alert others to any problems they may discover. Engaging the public on nuclear safety and security also serves an educational function, for all parties. An open deliberative and regulatory process informs the public of the realities of plant operations, while at the same time it informs Commission officials of the realities of public concerns and expectations. The result, over time, should be a more intelligent and responsive process.

Thank you again for conducting this review.