

NRC INSPECTION MANUAL

NSIR

MANUAL CHAPTER 0320

OPERATING REACTOR SECURITY ASSESSMENT PROGRAM

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Exhibit 1 – Overview of the Security Cornerstone

Exhibit 2 – Security Action Matrix

Attachment 1 – Revision History for IMC 0320

0320-01 PURPOSE

01.01 The Reactor Oversight Process (ROP) integrates the NRC's inspection, assessment, and enforcement programs. As part of the ROP, the Operating Reactor Security Assessment Program evaluates performance of operating commercial nuclear power reactor licensees in implementing their security programs and communicates the results to licensee managers, NRC managers, and certain other stakeholders.

01.02 The assessment program collects information from inspections and performance indicators (PIs) to enable the agency to arrive at objective conclusions about the licensee's performance in security, including material control and accountability (MC&A). Based on this assessment information, the NRC determines the appropriate level of agency response, including supplemental inspection and pertinent regulatory actions ranging from management meetings to orders for plant shutdown. The assessment information and agency response are then communicated to the licensee and to certain external stakeholders with the need to know the information. The agency takes follow-up actions, as applicable, to ensure that the licensee's corrective actions for performance weaknesses were effective.

01.03 This inspection manual chapter (IMC) describes the relationship of security assessment to the ROP, the processes common to both assessment programs, and processes and procedures for specifically assessing the security of operating nuclear power reactors. The security assessment process is part of the ROP, but security is assessed and reported separately from other ROP areas to keep adversaries from obtaining information that could be useful to them.

0320-02 OBJECTIVES

02.01 To collect information from inspection findings and PIs.

02.02 To arrive at an objective assessment of licensee security performance using PIs and inspection findings.

02.03 To assist NRC management in making timely and predictable decisions regarding appropriate agency actions used to oversee, inspect, and assess licensee performance.

02.04 To provide a method for informing certain stakeholders and obtaining their feedback on the NRC's assessment of licensee performance in security.

02.05 To provide a process to follow up on areas of concern.

0320-03 APPLICABILITY

This IMC applies to all operating commercial nuclear reactors, except those under IMC 0350, "Oversight of Reactor Facilities in a Shutdown Condition Due to Significant Performance or Operational Concerns." Nothing in this manual chapter prohibits the

NRC from taking any necessary actions to fulfill its responsibilities under the Atomic Energy Act of 1954, as amended.

This IMC specifically supplements the guidance in IMC 0305, "Operating Reactor Assessment Program," for the security cornerstone. If this chapter is silent on a topic, then the guidance in IMC 0305 should be followed.

0320-04 DEFINITIONS

The definitions in IMC 0305 apply to this chapter, with one exception. The phrase "multiple degraded cornerstones" does not apply to the assessment of the security cornerstone. The following definition is in addition to the definitions in IMC 0305.

04.01 Significant Inspection Finding Performance Indicator. An inspection finding with a significance greater than green (as determined by the physical protection significance determination process (PPSDP)) or a security performance indicator that is greater than green.

0320-05 RESPONSIBILITIES AND AUTHORITIES

The following responsibilities are in addition to those listed in IMC 0305.

05.01 Deputy Executive Director for Reactor and Preparedness Programs (DEDR). Approves deviations from the security action matrix.

05.02 Director, Office of Nuclear Security and Incident Response (NSIR)

- a. Implements the requirements of this inspection manual chapter within NSIR.
- b. Develops policies and procedures for the security assessment program.
- c. Ensures uniform program implementation and effectiveness.
- d. Concurs in regional requests to deviate from the security action matrix.

05.03 Director, Division of Security Operations (DSO), NSIR

- a. Oversees implementation of the requirements in this chapter and ensures consistent implementation across the regions.
- b. Recommends, develops, and implements improvements to the Operating Reactor Security Assessment Program.

05.04 Deputy Director for Security Oversight, DSO, NSIR

- a. Develops assessment program guidance.
- b. Collects feedback from the regional offices and assesses execution of the Operating Reactor Security Assessment Program to ensure consistent application.
- c. Provides oversight of the mid-cycle and end-of-cycle review meetings.
- d. Concurs on proposals by the regional office to extend an inspection finding in the assessment process beyond the normal four quarters in accordance with IMC 0305, Section 12.04.
- e. Concurs on proposals by the regional office to initiate a parallel inspection finding in accordance with IMC 0305, Section 12.04.
- f. Concurs on the supplemental inspection plan for plants in the Repetitive Degraded Cornerstone column of the security action matrix.

05.05 Regional Administrators

- a. Conduct assessment reviews and direct allocation of security inspection resources within the regional offices based on the security action matrix and other program guidance.
- b. Assure that annual discussions of security performance with licensees are conducted in nonpublic meetings.

05.06 Regional Directors of Division of Reactor Safety

- a. Approve proposals by the regional office to extend a security inspection finding in the assessment process beyond the normal four quarters in accordance with IMC 0305, Section 12.04.
- b. Approve proposals by the regional office to initiate a parallel inspection finding in accordance with IMC 0305, Section 12.04.
- c. Approve the supplemental inspection plan for plants in the Repetitive Degraded Cornerstone column of the security action matrix.

06.01 Overall Assessment Process. Security performance is reviewed over a 12-month period, using the ROP's processes and schedules (IMC 0305, Exhibit 3 and schedule of annual assessment cycle events¹). An overview of the security cornerstone, with its key attributes and applicable inspectable areas, is displayed on the diagram of Exhibit 1.

A significant inspection finding is carried forward for four calendar quarters or until appropriate licensee corrective actions have been completed, whichever is longer. Therefore, an inspection finding will no longer be considered in the assessment process after four calendar quarters unless the region has justification to keep the finding open in accordance with IMC 0305, Section 12.04 Keeping active for assessment any force-on-force findings that are not closed by headquarters within 12 months (four calendar quarters) of their issuance requires the concurrence of Deputy Director for Security Oversight, DSO, NSIR as specified in Section 06.06a.3.

The inspectors normally use the significance determination process (SDP) to evaluate inspection findings for significance. In addition, the NRC's enforcement policy may apply to issues which the SDP process can not evaluate for significance (e.g., violations that involve willfulness, including discrimination). These issues should be considered when determining the range of agency actions within the appropriate column of the security action matrix. Additionally, if applicable the underlying technical issue should be separately evaluated using the physical protection SDP (PPSDP) and the results considered in the assessment process.

06.02 Performance Reviews. The assessment process consists of a series of reviews that result in the issuance of various assessment letters. The content of security assessment letters should be below the level of safeguards information. Descriptions of security inspection findings or issues in the letters should be at the level used in the Reactor Program System—official use only. Security-related examples of the assessment letters mentioned below can be found on NRR's Digital City web site at: the following link: <http://nrr10.nrc.gov/rop-digital-city/0320exhibits.pdf>. The security-related assessment actions for each review are described below.

- a. Continuous Review. The DRS branch chief responsible for security ensures the continuous review of security performance is accomplished. Any anticipated change in security performance indicators should be reported to the region's DRS branch chief responsible for security.

The region may issue a security assessment follow-up letter to address a security issue, in accordance with the security action matrix, between the normal quarterly assessments if (1) a security-significant inspection finding is finalized or (2) a performance indicator, based on current inputs, will cross a performance threshold at the end of the quarter. The security letters will be prepared, designated, and marked as "Official Use Only—Security-Related

¹ IMC 0305 assessment schedule and assessment letter exhibits can be found at the following link:
<http://nrr10.nrc.gov/rop-digital-city/IMC-0305-Exhibits.doc>

Information” in accordance with NRC’s policy for handling, marking and protecting Sensitive Unclassified Non-Safeguards Information (SUNSI)² The letters shall contain the same type of information required of similar ROP assessment letters.

- b. Quarterly Review. The quarterly review uses the PI data submitted by licensees and inspection findings compiled over the previous 12 months. This review is conducted within 5 weeks of the end of each quarter of the annual assessment cycle. Performance indicators for the most recent quarter and applicable inspection findings are considered in determining agency actions using the security action matrix (Exhibit 2).

The DRS branch chief responsible for security ensures that the most recently submitted PIs (which should be submitted no more than 21 days after the end of the quarter) and the inspection findings in the Reactor Program System (RPS) are reviewed to identify any performance trends in security. The branch chief shall use the security action matrix to help identify any NRC actions that should be considered that are not already included in the existing inspection plan. Assessment follow-up letters are normally issued by the DRS branch chief within 2 weeks of the quarterly review for any new significant PIs or inspection findings. The letter shall follow the guidance in Section 06.02a.

On determining that a plant will be in the Repetitive Degraded Cornerstone column, the regional office should issue an assessment letter stating that the changes to the planned actions are consistent with the Repetitive Degraded Cornerstone column in the security action matrix.

- c. Mid-Cycle Review. The security cornerstone will be discussed during any regional assessment meetings to discuss performance in the other six cornerstones of safety. DRS members responsible for security will typically assemble the items needed for discussing security at the assessment meetings. The DRS branch chief responsible for security, or a designee, should attend the mid-cycle review meetings. The discussion of security should be at the official use only level unless the venue can support controlling safeguards information.

The output of this review is a mid-cycle letter that addresses the security cornerstone. The mid-cycle review and subsequent mid-cycle letters should only discuss issues from inspections that were completed before the end of the mid-cycle assessment period. Additional activities include planning inspection activities for the next 15-month period, and discussing any insights into potential substantive cross-cutting issues (problem identification and resolution, human performance, and safety-conscious work environment), in accordance with IMC 0612 section 06.03.c.(5), Appendix F, and IMC 0305 Section 07.03. The security action matrix is used to determine the scope of agency actions in response to the assessment inputs. The mid-cycle review will be completed within 7 weeks of the end of the second quarter of the annual assessment cycle.

²Security-related assessment letters should be treated as official use only documents described in Management Directive 12.6, “NRC Sensitive Unclassified Information Security Program,” with the exception of the markings.

The regional offices will develop a plant performance summary (see IMC 0305, Section 07.03) for plants with a degraded security cornerstone (two or more white inputs or 1 yellow input). If the meeting agenda or plant performance summary discuss security issues, the documents, as a minimum, should be clearly marked as “official use only” to ensure that the document is handled properly and not inadvertently released to the public. (See MD 12.6.)

The mid-cycle security letters shall be issued on the same schedule as the ROP letters. The security letters will be prepared, designated, and marked as “Official Use Only—Security-Related Information” in accordance with NRC’s policy for handling, marking and protecting SUNSI. The letters shall contain the same type of information required of ROP assessment letters. The ROP assessment letters should contain a brief statement that the security assessment was completed and will be reported in a separate letter.

An inspection plan of security activities, covering approximately 15 months from the issuance of the mid-cycle letter, will be included with the security mid-cycle letters. The inspection plan is report 24 from the RPS. The schedule for force-on-force exercises are not to be included unless first coordinated with the Security Performance Evaluation Branch of NSIR.

- d. End-of-Cycle Review. The security cornerstone will be discussed along with the other ROP cornerstones during the regional office’s end-of-cycle review. Regional DRS members responsible for security will typically assemble the items needed for discussing security at the assessment meetings. The output of this review is a security assessment letter for each plant. The end-of-cycle review and subsequent annual assessment letters should only discuss issues from inspections that were completed before the end of the assessment period. Additional activities include planning security inspection activities for the next 15-month period and developing an input (if applicable) to support the Agency Action Review Meeting. Substantive cross-cutting issues, including those with security-related findings, are discussed in the public ROP assessment letters for the other ROP cornerstones. The security assessments will follow the same schedule and guidance as the ROP assessments. The security action matrix will be used to determine the scope of agency actions in response to security-related assessment inputs.

The RPS listing of security inspection findings will accompany the Plant Issues Matrix (PIM) reports produced for the end-of-cycle assessments. The regional offices shall develop a plant performance summary (see IMC 0305, Section 07.04) for those plants whose security performance has been in the Degraded Cornerstone column, Repetitive Degraded Cornerstone column, or Unacceptable Performance column of the security action matrix during any quarter of the previous 12 months. The content of the plant performance summaries will follow the guidance of IMC 0305 as it applies to the security performance being documented.

If the meeting agenda or plant performance summary discuss security issues, the documents shall be, as a minimum, clearly marked as “official use only” to ensure that the document is handled properly and not inadvertently released to the public. (See MD 12.6.)

The DRS branch chiefs responsible for security are expected to participate in their region’s end-of-cycle review meetings. The discussions of security performance or issues should be kept at the official-use-only level. If safeguards information must be discussed, the necessary measures should be taken to protect the information.

The output of the end-of-cycle review is an annual security assessment letter for each facility. The letters will be designated and marked as “Official Use Only—Security-Related Information” in accordance with NRC Policy for handling, marking and protecting SUNSI. The letters shall be issued on the same schedule as the ROP assessment letters. The signature authority for each annual security assessment letter is determined by the most significant column of the security action matrix that the plant has been in over the four quarters of the assessment cycle. The letters shall contain the same type of information required of ROP assessment letters, and include a schedule of security inspections as discussed in 06.02c, above. The ROP assessment letters should contain a brief statement that the security assessment was completed and will be reported in a separate letter.

06.03 Program Reviews. Plants with significant performance weaknesses in security will be discussed at the Agency Action Review Meeting. Those are the plants that are in the Repetitive Degraded Cornerstone or Unacceptable Performance columns of the security action matrix.

06.04 Annual Meeting With Licensee. Performance in the security cornerstone will not be discussed during the public assessment meeting with licensees.³ If the plant’s performance in security is in the Licensee Response column of the security action matrix, then the licensee should be offered the opportunity to discuss their performance in a nonpublic meeting coincident to the public meeting. If the region’s assessment places a plant’s security performance beyond the Licensee Response column of the security action matrix, the region will schedule a closed meeting with the licensee to discuss the performance and agency actions. The meeting can be held the same day as the public annual meeting and be led by the same NRC attendees if the appropriate level of management is involved. The appropriate level of management is the level indicated on the Regulatory Performance Meeting row of the security action matrix.

If performance in the security cornerstone is significantly degraded (i.e., Degraded Cornerstone column in the security action matrix or worse) and performance of the other ROP cornerstones is in the Licensee Response or Regulatory Response column in the ROP action matrix, then a security performance meeting must be held with the licensee within 16 weeks of the annual security assessment letter if the public meeting is scheduled later, as is allowed by IMC 0305, Section 09.

³The NRC’s and industry’s actions in security may be discussed in general at the public meeting, but should only include information that the agency has already made public on the topic.

The purpose of the meeting is to allow the licensee an opportunity to respond to the information in the security annual assessment letter and to ensure the licensee understands the basis for our assessment and planned actions. It is also an opportunity for the NRC to fully understand the licensee's position and corrective actions.

06.05 NRC Responses to Licensee Performance

- a. Security Action Matrix. The security action matrix (Exhibit 2) is based on the ROP action matrix. Therefore, the security action matrix takes a graded approach to addressing performance issues. The terms in the IMC 0305 discussion of the ROP action matrix also apply to the security action matrix. The next three paragraphs describe aspects of the security action matrix that differ from the ROP action matrix.
 1. Regulatory Performance Meetings. Such meetings to discuss security-related issues are not open to the public.
 2. Communication. Communication between the licensee and the NRC and between the NRC and external stakeholders uses a graded approach. For declining licensee performance, higher levels of agency management will review and sign the assessment letters and conduct the annual assessment meeting. Also for declining performance, the NRC's assessment letter will be sent to selected external stakeholders with a need to know the information.⁴
 3. Repetitive Degraded Cornerstone. This column designation replaces the multiple/repetitive degraded cornerstone column of the ROP action matrix as the security action matrix applies to only one cornerstone.
- b. Expected Responses for Each Action Matrix Column. The range of expected licensee and NRC actions in the security action matrix is similar to the range in the ROP action matrix. The following sections describe aspects of the security matrix that are specific to the security cornerstone.
 1. Regulatory Response Column. Assessment inputs result in no more than one white input; the cornerstone objective is met with minimal reduction in security performance. Regulatory performance meetings for security are not open to the public.
 2. Degraded Cornerstone Column. Assessment inputs result in multiple white inputs or 1 yellow input; the cornerstone objective is met with moderate degradation in security performance. Regulatory performance meetings for security are not open to the public.

⁴Reference memo from Roy Zimmerman to regional administrators, subject "Providing State Officials Security Related Documents," dated April 19, 2005, ML050630069

A regulatory action that the region may consider in response to performance in this column is to stop announcing baseline and supplemental security inspections to the licensee. That is, an assessment letter sent to the licensee will not include the RPS report 24 inspection schedule for security, or specific security inspections would not be listed on report 24. In addition, the region needs to consider if a confirmatory action letter is warranted based on the collection of inputs that determined performance at this level.

Note: The confirmatory action letter (CAL) for this column of the action matrix is not mandatory, but the regional office should consider issuing a CAL when important information on adverse licensee performance becomes available.

3. Repetitive Degraded Cornerstone. Assessment inputs result in a repetitive degraded cornerstone (2 or more white inputs or a yellow input for five or more consecutive quarters), multiple yellow inputs, or a red input. If the only greater than green finding in the fifth quarter has been held open greater than four quarters, the repetitive degraded cornerstone does not apply. If, however, one of the greater than green findings is still within the original four quarters and one or more findings has been held open greater than four quarters, the repetitive degraded cornerstone does apply. In this instance, the plant would stay in the Repetitive Degraded Cornerstone column until there was only one greater than green finding, regardless of the length of time the findings have been opened. The inspection plan for supplemental Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input," must be approved by the Director, DRS, with the concurrence of the Director, DSO, NSIR.

Note: Other than the CAL, the regulatory actions listed in this column of the action matrix are not mandatory. However, the regional office should consider each of these regulatory actions when important new information on adverse licensee performance becomes available.

After the supplemental inspection, the EDO or the EDO's designee, in conjunction with the regional administrator and the Director, NSIR, will decide whether additional agency actions are warranted. Regulatory performance meetings for security shall not be open to the public.

4. Unacceptable Performance Column. Overall unacceptable performance; unacceptable margin for security.

Note: If the agency determines that a licensee's performance is unacceptable, a shutdown order may be issued.

06.06 Additional Action Matrix Guidance. The guidance in IMC 0305 applies to the security cornerstone and the security action matrix, with the following exceptions.

a. Approvals and Concurrences

1. Items in IMC 0305 requiring approval or concurrence by the Deputy Director, Division of Inspection and Regional Support, NRR, will require the approval or concurrence of the Deputy Director for Security Oversight, DSO, NSIR, for security-related issues.
2. Items in IMC 0305 requiring approval or concurrence by the Director, NRR, will require the approval or concurrence of the Director, NSIR, for security-related issues.
3. Extending security-related inspection findings for consideration in assessments beyond four calendar quarters will follow the same process specified in IMC 0305, Section 12.04. However, certain force-on-force findings are the responsibility of headquarters to close. Extending any of those findings needs to be coordinated with the Security Performance Evaluation Branch, DSO, NSIR, the approval of the regional Director, DRS, and the concurrence of the Deputy Director for Security Oversight, DSO, NSIR. The affected licensee will be notified by letter of any such extensions.

- b. Cross-cutting Aspects and Substantive Cross-Cutting Issues. During the course of their inspections, inspectors will use the provisions contained in IMC 0612 (Section 06.03.c.(5) and Appendix F) and IMC 0305 (Section 13.0) to identify any relevant cross-cutting aspects that are associated with their inspection findings. The cross-cutting aspects will be communicated to the licensee at the inspection exit meeting and within the inspection report as described in IMC 0612. Security inspection report transmittal letters will document the cross-cutting aspects, if any, as described in IMC 0612, Exhibit 4. During the ROP assessments, the regional consideration of cross-cutting aspects of findings in identifying the existence of substantive cross-cutting issues in the ROP cornerstones will also include the cross-cutting aspects of security findings.

Only the cross-cutting aspects of the security-related finding may be made publicly available. Making any other details of the security-related finding public requires prior approval of the Director, DSO, and NSIR.

- c. Problem Identification and Resolution (PI&R) Inspections. The security cornerstone will continue to be considered along with the other six cornerstones for inclusion in the biannual PI&R team inspections conducted at each power reactor site. A security specialist may be added to the PI&R team as a full-time or part-time member. Any inspection results derived from security-related PI&R inspections will not be made public. The security-related inspection information may be included in (1) a nonpublic attachment to the team inspection report, (2) the next-issued security inspection report, or (3) a separate, nonpublic inspection report on the security-related findings. The publicly available PI&R inspection report should include a brief statement that the inspection included the security cornerstone.
- d. Deviations from the Security Action Matrix. In the rare instance when the regulatory action specified in the security action matrix is not appropriate for the issue, the region may request to deviate from the matrix. The request is made as specified in IMC 0305, **Section 12.06**, with the following change. The request is to be made to the Office of Executive Director of Operations (OEDO), Deputy Executive Director for Reactor and Preparedness Programs (DEDR) with the concurrence of the Director, NSIR.

Indeterminate losses of target sets during a force-on-force exercise that are evaluated with the Baseline PPSDP and result in a green finding are not considered deviations from the action matrix.

END

EXHIBITS:

1. Overview of the Security Cornerstone
2. Security Cornerstone Action Matrix

Attachment 1: Revision History for IMC 0320

EXHIBIT 1 Overview of the Security Cornerstone

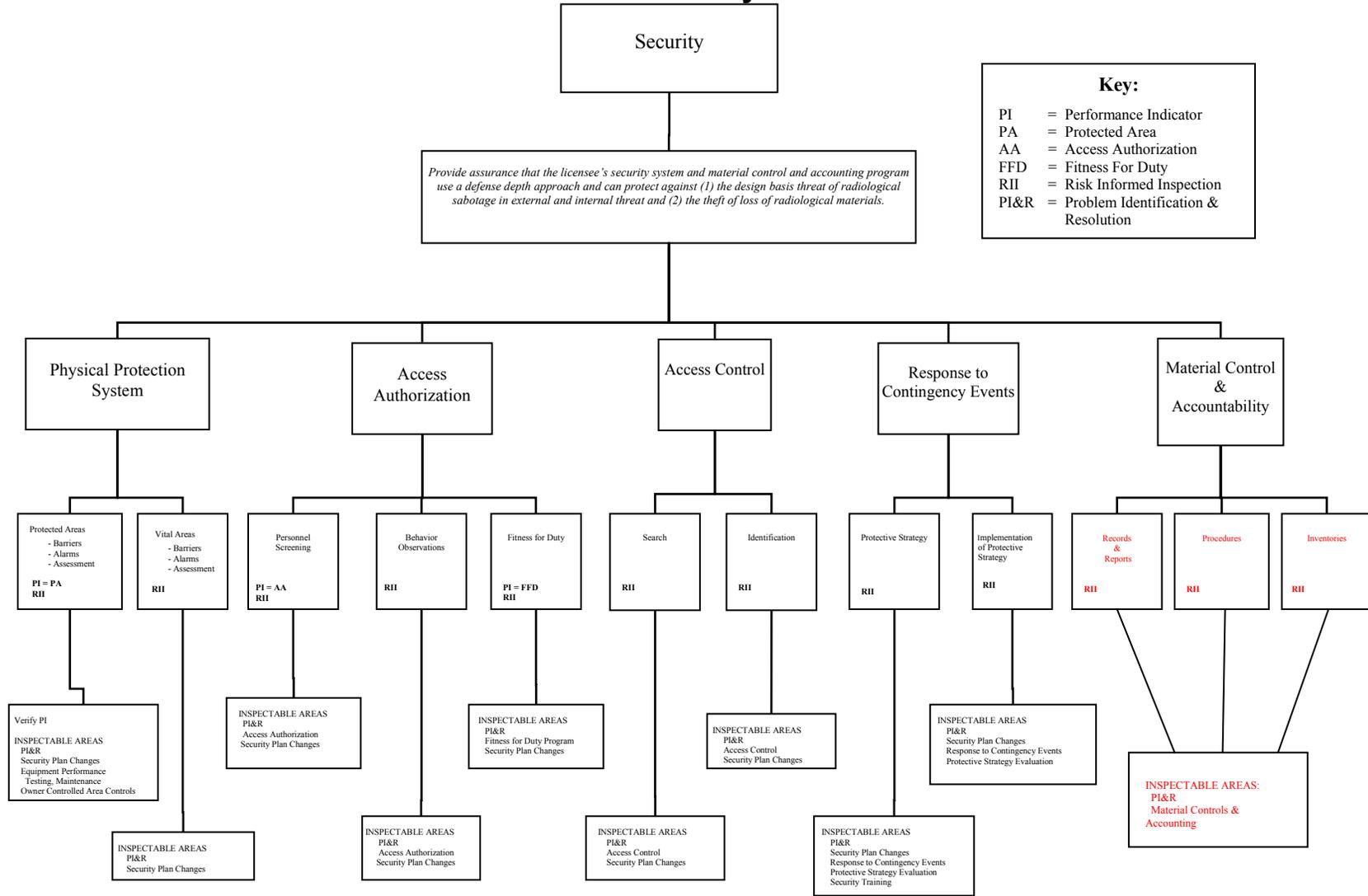


EXHIBIT 2 Security Cornerstone Action Matrix

		Response Bands				
		Licensee Response	Regulatory Response	Degraded Cornerstone	Repetitive Degraded Cornerstone	Unacceptable Performance
RESULTS	X	All assessment inputs (performance indicators and inspection findings) green; cornerstone objectives fully met	One white input; cornerstone objective met with minimal reduction in security performance	Multiple white inputs or 1 yellow input; cornerstone objective met with moderate degradation in security performance	Multiple yellow inputs or 1 red input; cornerstone objective met with longstanding issues or significant degradation in security performance	Overall unacceptable performance; unacceptable margin for security
RESPONSE	Regulatory Performance Meeting	None	Branch chief (BC) or division director (DD) meets with licensee	DD or regional administrator (RA) (or designee) meets with senior licensee management	EDO or DEDR meets with senior licensee management	EDO or DEDR meeting with senior licensee management
	Licensee Action	Licensee corrective action	Licensee root cause evaluation and corrective action with NRC oversight	Licensee cumulative root cause evaluation with NRC oversight	Licensee performance improvement plan with NRC oversight	
	NRC Inspection	Risk-informed baseline inspection program	Baseline and supplemental Inspection Procedure 95001	Baseline and supplemental Inspection Procedure 95002	Baseline and supplemental Inspection Procedure 95003	
	Regulatory Actions ⁵	None	Supplemental inspection only	Supplemental inspection only. Plant discussed at AARM if conditions met	10 CFR 2.204 DFI 10 CFR 50.54(f) letter CAL/order Plant Discussion at AARM	Order to modify, suspend, or revoke licensed activities Plant discussion at AARM
COMMUNICATION	Assessment Letters	BC or DD reviews, signs assessment report (w/inspection plan)	DD reviews, signs assessment report (w/inspection plan)	RA reviews, signs assessment report (w/inspection plan)	RA reviews, signs assessment report (w/inspection plan)	
	Annual Assessment Meeting	SRI or BC meets with licensee	BC or DD meets with licensee	RA (or designee) discusses performance with senior licensee management	EDO or DEDR discusses performance with senior licensee management	
	External Stakeholders	None	State Governors	State Governors, DHS, Congress	State Governors, DHS, Congress	State Governors, DHS, Congress
	Commission Involvement	None	None	Possible commission meeting if licensee remains for 3 years	Commission meeting with senior licensee management within 6 months	Commission meeting with senior licensee management

INCREASING SIGNIFICANCE

⁵Other than a CAL, the regulatory actions for plants in the Repetitive Degraded Cornerstone column are not mandatory agency actions. However, the regional office should consider each of these regulatory actions when significant new information on licensee performance becomes available. In the Degraded Cornerstone column, a CAL is not mandatory and should only be considered if other performance information warrants a CAL. See IMC 0305, E4-1 for additional information.

ATTACHMENT 1

Revision History for IMC 0320

Commitment Tracking No.	Issue Date CN No.	Description of Change	Training Needs	Training Completed	Comment Resolution ADAMS No.
N/A	N/A	Researched commitments back four years - none found	None	N/A	N/A
N/A	8/22/05	Initial issue	None	N/A	N/A
N/A	4/4/07 CN 07-12	Revised to include substantive cross-cutting issue guidance	None	N/A	N/A
N/A	07/01/08 CN 08-019	Incorporated material controls and accounting into the security cornerstone as key attribute of the cornerstone. Elimination of two Performance Indicators per Commission guidance. Made changes to align exhibits with other IMC changes (e.g. IMCs 0305 and 0612). Exhibit marking instructions, converted document to Microsoft Word and IMC 0040 format, and updated Exhibit 1, security cornerstone chart.	None	N/A	ML073532030
N/A	04/09/09 CN 09-011	Conforming editorial changes to reflect revision to IMC 0305	None	N/A	N/A