

July 9, 2009

Mr. S. D. Portzline, Security Consultant
Three Mile Island Alert
3715 N. 3rd Street
Harrisburg, PA 17110

Dear Mr. Portzline:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your May 13, 2009, letter which outlined security concerns related to the availability of high-resolution satellite images of nuclear power plant sites and a belief that security officers are not present at nuclear plant entrances. The NRC values public interest in matters under its purview and appreciates your willingness to raise your concerns.

With respect to the availability of high-resolution satellite images and the accessibility of such images by potential adversaries, licensees are required to assume the availability of information such as satellite imagery, aerial mapping, and covert surveillance data to an adversary. While the level of detail available may be disconcerting to a member of the public, such photos reveal very little information associated with a licensee's physical protection strategy. In fact, licensees are required to defend against an adversary force that has had the benefit of accessing and analyzing information such as satellite and aerial images. More specifically, the Design Basis Threat that each site must be able to defend against includes among its adversary characteristics an "insider" who provides assistance to an assault force. That assistance may include, but is not limited to, analyzing and sharing surveillance images, in-plant photos, plant drawings, and the licensees specific security strategies. The NRC believes that the use of these images provides marginal benefit to a potential adversary and is also being effectively mitigated by existing regulations and regulatory oversight.

Regarding the second concern outlined in your letter, security officers are deployed at each nuclear plant in a manner that provides deterrence, timely response, and access control as required by the NRC regulations. Security officers control entrances to the sites, including vehicular and pedestrian ingress/egress points. The exact posting or locations of officers is based on multiple factors, each of which has linkage to the concept of defense in depth and may not always be visible to the public. That strategy element is included as a component within the Site Security Plan, for which the site is accountable and the NRC approves and inspects to ensure compliance.

The NRC ensures compliance with its security regulations through regular oversight and inspection of licensees' security measures. In particular, licensees' security measures are inspected as part of the NRC's Reactor Oversight Process (ROP). The ROP's baseline inspection program is used to ensure that plant and radiological safety, security, and emergency preparedness at operating sites are maintained. Further, the NRC's performance-based force-on-force inspection activities test licensees' ability to implement its physical protection strategy in multiple attack scenarios. The mock adversary force used in the force-on-force exercises may use the "insider" information described above. Lastly, the NRC coordinates with multiple Federal partners in both assessing and responding to the threat environment, such that any potential threats are communicated promptly to the nuclear facilities and first responder

S. Portzline

-2-

agencies. In the aggregate, efforts such as these and other sensitive and classified initiatives provide for a well-grounded security program at each site.

I want to thank you for taking the time to meet with the NRC Region I staff on June 2, 2009. We also appreciate the further clarification you provided to the staff in attendance on the mapping and security officer posting issues raised in the letter. I understand that those were the only two issues you wanted to raise to the NRC.

Thank you again for bringing these issues to our attention. If we may be of further assistance, please contact Mr. Craig Erlanger of my staff at 301-415-5374.

Sincerely,

/RA/

Richard P. Correia, Director
Division of Security Policy
Office of Nuclear Security and Incident Response

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-2-

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Richard P. Correia, Director
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Office of Nuclear Security and Incident Response

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