

ISFSI AND MRS SECURITY RULEMAKING

Public Webinar on Draft Technical Basis

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Agenda

- 1300 – 1310 Introduction
- 1310 – 1320 Objectives of this Security Rulemaking
- 1320 – 1350 Specific Technical Approaches
- 1400 – 1650 Questions and Comments
- 1650 – 1700 Closing

Rulemaking Objectives



- To improve consistency and clarity of 10 CFR Part 73 regulations for both types of ISFSI licensees (general and specific) and to reflect current Commission thinking on security requirements.
- To make generically applicable requirements similar to those imposed by the post-9/11 ISFSI security orders
- To use a risk-informed and performance based structure in updating these security regulations

Proposed Changes

- Use a risk-informed and performance-based approach with licensees performing dose calculations on specific security scenarios (applicable to their facility)
- Add a 0.05-Sievert (Sv) (5-Rem) dose limit requirement (at the controlled area boundary (CAB)) to Part 73 (equivalent to the §72.106 dose limits)
- Licensees would use an iterative approach and could change inputs (e.g., distance to the CAB) to achieve success or use engineered security features to prevent a security scenario
 - Worst case requires shift to a denial protective strategy

Proposed Changes

(Continued)



- Consistent outcomes across all ISFSIs and MRSs
 - All facilities will meet the 0.05 Sv dose limit at the CAB
 - However, security programs and plans can vary
- Require blast analysis and permanent vehicle barriers for land based and waterborne vehicle borne improvised explosive devices (VBIEDs).
 - Protection of the SNF/HLW, CAS/SAS, and transfer path
 - Protection of security personnel defensive positions (if licensee is implementing a denial protective strategy)
- Update these security regulations to use appropriate language from the NRC's recent power reactor security rule (see§73.55)

Proposed Changes

(Continued)



- Consolidate and reorganize the ISFSI and MRS regulations for both general and specific licenses into a series of contiguous sections in Part 73
- ISFSIs and MRS will no longer be subject to the DBT for radiological sabotage or the requirements of §73.55 (power reactor security requirements)
- Requirements will be separate; however, the ISFSI licensee's PSP can be integrated into a reactor's security plan or be contained in a separate (stand alone) plan

Proposed Changes

(Continued)



- Documentation and review of MOU with LLEA for Detect, Assess, and Communicate protective strategies
- New information submission requirement on ISFSI or MRS information (distances to boundaries, number of casks, etc)
- Security scenario guidance document (NUREG) being developed under a contract
 - Future cleared stakeholder comment opportunity

Supporting Information



- The staff is developing a draft regulatory guide (DG-5033) containing security performance (adversary) characteristics
 - Developed per Commission direction in SRM-SECY-07-0148
 - Contains Safeguards Information
- Draft DG-5033 will be sent to Commission before being issued for cleared stakeholder comment period
 - Cleared stakeholder comment meetings will also be held
 - FRN will be issued noticing meetings and opportunity to comment on DG-5033
- DG-5033 guidance is bounded by RG 5.69; however, there are some specific differences (both appearance and substance)

Specific Issues

- Physical Security Plan
- Training and Qualification Plan
- Contingency Response Plan
- Access Authorization Program
- Insider Mitigation
- Vehicle Barrier System
- Physical Barrier System
- Intrusion Detection Systems
- Video Capture
- Access Points and Search
- Alarm Station Capabilities
- Redundant Communications Equipment
- Independent Power Systems
- Single Node Failures
- Force-on-Force Evaluations
- Deadly Force Training
- Suspension of Security Measures
- Alternative Measures
- Records
- Compensatory Measures
- Maintenance, Testing, Calibration
- Security Program Reviews
- Security and Emergency Response
- ASOs and Armed Responders
- Effective and Compliance Dates

References

Draft Technical Basis, Revision 1 (December 2009) Docket ID: NRC-2009-0558	ML093280743
Commission: SECY-07-0148 (redacted)(August 28, 2007)	ML080030050
Commission: SRM-SECY-07-0148 (December 18, 2007)	ML073530119
Webinar Slides	ML093490243