September 17, 2010

SUBJECT: Safeguards Evaluation Report on Idaho State University
Docket No: 70-1374, License No: SNM-1373, Fixed Site and In-Transit Physical Security Plan For Protection Of Category III Low Enriched Uranium, Revision 6, Dated July 2010, hereafter referred to as the Physical Security Plan (PSP). (TAC L32627)

BACKGROUND

By letter dated July 6, 2010, Idaho State University (ISU) submitted Revision 6 of the PSP for review and approval by the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 70 as part of a license renewal application. (ES100016666)

REGULATION

Fixed Site Security:

Title 10 of the *Code of Federal Regulations* (10 CFR) 73.67, discusses fixed site and in-transit requirements for the physical protection of special nuclear material (SNM) of moderate and low strategic significance.

10 CFR 73.71, Reporting of safeguards events.

REGULATORY GUIDANCE

Regulatory Guide (RG) 5.59, "Standard Format and Content for a Licensee Physical Security Plan for the Protection of Special Nuclear Material of Moderate or Low Strategic Significance" (1983)

ACTION REQUESTED

The Office of Nuclear Material Safety and Safeguards (NMSS) requested that the NSIR staff

(1) review the PSP submitted by the Licensee
(2) prepare Request for Additional Information;
(3) evaluate additional information submitted; and
(4) prepare input for the Safeguards Evaluation Report.

Enclosure 1

DISCUSSION

The PSP was reviewed to ensure the applicant has an acceptable understanding of the security requirements as outlined in 10 CFR Part 73 and commits to implementing the general performance objectives of 10 CFR 73.67(a), the specific fixed site and security requirements of 10 CFR 73.67(c), (f), and other applicable requirements set forth in parts 73.

The PSP was also reviewed to ensure the applicant's commitment to store SNM only in a controlled access area (CAA), monitor the protection on SNM by an intrusion detection system or other approved procedures, maintain both a guard force and offsite response force available to respond to unauthorized penetrations or activities, establish and maintain response procedures for dealing with threats of theft or theft of SNM, and implementing the proper reporting and investigations in the event of lost or unaccounted for material.

Revision 6 had additional information added as paragraph 4 of Section 5.2 concerning an additional storage location of SNM in quantities less than 3 grams. The new location is within an established CAA. This change did not reduce the safeguards effectiveness of the PSP.

This revision was identified by the submittal letter as revision 6 in the subject line but was identified as revision 5 in the text and on the individual pages of the PSP. It was further identified a replacing revision 5, which was produced earlier this year. [January 15, 2010] In order to eliminate confusion, the transmittal letter and all pages of the July revision were marked as Revision 6. The next revision, if submitted, will be Revision 7.

CONCLUSIONS

The U.S. Nuclear Regulatory Commission (NRC) staff's review of the applicant's Physical Security Plan (PSP) for the protection of Special Nuclear Materials (SNM) of Low Strategic Significance (LSS) contains information that has been marked as "Safeguards Information" by the applicant, pursuant to 10 CFR 73.22. The methods and procedures as outlined in the PSP satisfy the performance objectives, systems capabilities, and reporting requirements specified in 10 CFR 73.67 and 73.71. The PSP for the facility is acceptable and provides reasonable assurance that the requirements for the physical protection of SNM-LSS will be met.

The staff concludes that Revision 6, dated July 2010, of the PSP provides reasonable assurance that the safeguards effectiveness of the PSP has not been decreased.

PRINCIPAL CONTRIBUTOR(S)

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