

## Malave, Yanely

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**From:** Malave, Yanely  
**Sent:** Tuesday, March 27, 2012 9:40 AM  
**To:** 'JAHalfinger@babcock.com'  
**Cc:** 'Poslusny, Chester'; Starefos, Joelle  
**Subject:** B&W mPower Safeguards Information Protection Plan Addendum RAI Dated 3/27/2012  
**Attachments:** RAI 6370.doc

March 27, 2012

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF ADDENDUM TO  
THE BABCOCK & WILCOX NUCLEAR ENERGY APPROVED SAFEGUARDS  
INFORMATION PROTECTION PLAN

Dear Mr. Halfinger:

By letter dated February 16, 2012, (ML12053A065) Babcock & Wilcox (B&W) submitted, for U.S. Nuclear Regulatory Commission (NRC) staff review, the "B&W mPower Reactor Safeguards Information Protection Plan Addendum, February 2012, Rev. 000," that documents the requirements for the generation, use, and storage of safeguards information (SGI) that have been established at the Bechtel Power Corporation office located in Frederick, MD. The NRC staff is performing a detailed review of this plan addendum to ensure that the parameters for a procedurally sound information security program are addressed. The NRC staff has identified that additional information is needed to continue portions of the review. The staffs request for additional information (RAI) is contained in the enclosure to this email.

To support the review schedule, you are requested to respond by April 27, 2012. If changes are needed to the plan addendum, the staff requests that a revision to "B&W mPower Reactor Safeguards Information Protection Plan Addendum, February 2012, Rev 000," be submitted with the RAI responses.

If you have any questions or comments concerning this matter, you may contact me at 301-415-1519 or Joelle Starefos at 301-415-6091.

Docket No. PROJO776  
eRAI Tracking No. 6370

Email Attachment: Request for Additional Information 6370 RAI Letter No. 5

Sincerely

*Yanely Malave-Velez*

Project Manager  
US NRC - Office of New Reactors  
Division of Advanced Reactors and Rulemaking  
Projects Branch  
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301-415-1519

Request for Additional Information No. 6370 Revision 0

3/27/2012

mPower Pre-Application Activities  
Babcock and Wilcox  
Docket No. PROJ 0776  
SRP Section: NONE - NO SRP SECTION  
Application Section: NONE - mPower Reactor Information Protection System

QUESTIONS for Advanced Reactor Branch 2 (ARB2)

NONE-21

Please explain why there is no reference, within the Purpose Statement, to state the nexus of this plan to that of the Babcock and Wilcox (B&W) approved plan (R0003-08-002073). As written, it appears that this particular plan is a stand-alone product that was developed by Bechtel Power Corporation and intended to serve as an independent day-to-day standard operating procedure for Safeguards Information (SGI) protection.

Page 4, Section 1.0

NONE-22

The definition for "Authorized Individual" indicates that the person will be identified in writing, but the definition for "Authorized Designator" does not require that same provision. Will all "Authorized Individuals" also serve as "Authorized Designators," or will "Authorized Designators" merely require verbal approval?

Page 5, Section 3.0

NONE-23

Please explain why there is a definition for "Document Management System (DMS)" and no reference to DMS within the Plan.

Page 5, Section 3.0

NONE-24

Please explain why the generic term "locked security container" is used as opposed to "security storage container," as referenced in Section 3.0 as the tool that will be used to store SGI.

Page 9, Section 5.0

NONE-25

Please explain why you chose to use the term "originators" and not the term "authorized designator" as defined in Section 3.0.

Page 10, Section 5.1

NONE-26

Please explain why there is no reference to the B&W NE more detailed local guidance document for SGI protection “The Procedures” in this section. Other sections of this document contain reference to the B&W NE local procedures that also correspond to the similar referenced topics contained within the U.S. Nuclear Regulatory Commission (NRC) approved B&W mPower Reactor SGI Protection Plan (BWNE R003-08-002073).  
Page 10, Section 5.1

NONE-27

This section states that one must have “authorization” to remove SGI from the Controlled Access Area. Additionally, it infers that the authorization can include short-term use, processing and review of SGI from one’s home or private residence. Please identify who grants that authority and explain why this addendum makes inference to permissible information security practices that are not addressed in the NRC approved B&W SGI Protection Plan.  
Page 10, Section 5.3

NONE-28

Consider revising the last sentence to read: Transcripts, or minutes of meetings.....appropriately marked in accordance with NRC Guide to Marking Safeguards Information and protected in accordance with the B&W mPower Reactor Safeguards Information Protection Plan and this addendum. As written, it states that those written products are marked and protected in accordance with the NRC Guide to Marking; a guidance document that does not address protection requirements.  
Page 12, Section 5.3; Paragraph 3

NONE-29

This paragraph states that meeting participants will be required to turn off cellular telephones or other two-way communication devices in meeting rooms where SGI will be discussed or presented. Please clarify whether or not this requirement is applicable in all instances, formal and informal, when SGI discussions take place on site. Additionally, please explain why this requirement is applicable at the BPC site and not the B&W NE facility.  
Page 12, Section 5.3; last paragraph

NONE-30

Please identify who has the authority to destroy SGI documents/removable electronic storage media containing SGI, or identify the guidance document that addresses those detailed requirements associated with SGI destruction.

Please explain how the requirements stated on page 9, Section 5 are applied to the stated procedures for destruction.

Page 13, Section 5.8

NONE-31

Please explain the difference between the periodic assessment that will be conducted initially and at least annually, and the annual recurring inspection that is conducted by the Security Coordinator.

Page 13, Section 5.8