

From: [Roundtree, Amy](#)
To: [Roundtree, Amy](#)
Subject: QUERY: rationale for withholding NEI 11-08, Guidance on Submitting Security Plan Changes, Revision 0, Dated April 2012, from public disclosure
Date: Friday, April 13, 2012 9:28:22 AM

From: HANSON, Jerud [mailto:jeh@nei.org]
Sent: Wednesday, April 11, 2012 1:32 PM
To: Felts, Russell
Cc: KLINE, Dave; Westreich, Barry; Layton, Michael
Subject: Re: QUERY: rationale for withholding NEI 11-08, Guidance on Submitting Security Plan Changes, Revision 0, Dated April 2012, from public disclosure

I think I must have overlooked that! There is no need to withhold this from public viewing.

Jerud Hanson
Sent from my iPhone

On Apr 11, 2012, at 1:30 PM, "Felts, Russell" <Russell.Felts@nrc.gov> wrote:

Jerud,

My staff is reviewing NEI 11-08 for endorsement, and we will provide any comments after our review.

However, I must inquire about NEI's disposition of the first of our comments, provided on February 16, 2012, from our review of the previous draft. In that comment, we asked that NEI provide the basis for withholding the document from public disclosure under the provisions of 10 CFR 2.390. We are unable to find a justification for such withholding.

Please provide a rationale for withholding NEI 11-08 and the associated transmittal letter.

Regards,

Russell Felts
Chief, Reactor Security Licensing Branch
Office of Nuclear Security and Incident Response
U. S. Nuclear Regulatory Commission
Russell.Felts@nrc.gov
(301) 415-5211 (office)
(301) 512-3156 (mobile)

From: KLINE, Dave [mailto:dk@nei.org]
Sent: Thursday, April 05, 2012 10:28 AM
Subject: Endorsement of NEI 11-08, Guidance on Submitting Security Plan Changes, Revision 0, Dated April 2012

~~SECURITY RELATED INFORMATION – WITHHOLD FROM PUBLIC
DISCLOSURE UNDER 10 CFR 2.390~~

April 5, 2012

Mr. James T. Wiggins
Director
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Endorsement of NEI 11-08, *Guidance on Submitting Security Plan Changes*, Revision 0, Dated April 2012

Project Code: 689

Dear Mr. Wiggins:

NEI 11-08, *Guidance on Submitting Security Plan Changes*, Revision 0, dated April 2012, was developed to provide information for licensees to consider when submitting security plan changes to the NRC. The security plan consists of the Physical Security Plan (PSP), Training and Qualification Plan (T&Q), and the Safeguards Contingency Plan (SCP). This guidance is intended to assist the licensee in determining types of information to analyze when considering whether to submit a 10 CFR 50.90 or a 10 CFR 50.54(p) plan change, and also includes guidance for licensees specifically applying to Remotely Operated Weapons Systems (ROWS) technology.

NEI 11-08 has been completed through the combined efforts of the NRC, NEI, and key industry personnel in order to address regulatory issues that have the potential to impact site security licensing documents. It has also been designed to specifically address and provide a template for licensees who intend to implement ROWS technology at their site(s).

NEI previously submitted NEI 11-08, Revision 0, for NRC endorsement on December 21, 2011. We received comments from the NRC staff on February 15, 2012 and have incorporated all staff comments into this revision.

NEI requests NRC to review and provide endorsement of NEI 11-08, Revision 0, dated April 2012, by May 10, 2012. If any revisions to this document are desired, please include suggested wording and the technical data to support the proposed change.

If you have questions or require additional information, please contact Jerud Hanson at (202) 739-8053; jeh@nei.org or me at (202) 739-8174; dk@nei.org.

David R. Kline
Director, Security

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