



NUCLEAR ENERGY INSTITUTE

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November 1, 2012

Ms. Christiana H. Lui
Director, Division of Security Policy
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Endorsement of Supplemental Guidance to NEI 09-05, *Guidance on the Protection of Unattended Openings that Intersect a Security Boundary*, Revision 0, Supplement, Dated November 2012

Project Code: 689

Dear Ms. Lui:

NEI 09-05, *Guidance on the Protection of Unattended Openings that Intersect a Security Boundary*, Revision 0, was developed to assist licensees with compliance with the Commission's regulation 10CFR73.55, which requires licensees to provide physical protection of nuclear power reactors against radiological sabotage. NEI 09-05 was developed through the combined efforts of the NRC, NEI, and key industry personnel in order to address NRC and industry comments resulting from NRC Regulatory Issue Summary 2005-04, *Guidance on the Protection of Unattended Openings that Intersect a Security Boundary or Area*.

The evaluation, analysis and engineering examples provided within NEI 09-05 and the associated appendices have been used as the basis for the industry guidance criteria contained within the document. Development of these evaluation, analysis and engineering methodologies were made possible through the combined efforts of industry members willing to extend the necessary resources to perform the research and contribute to the successful completion of NEI 09-05.

Document contains no information eligible for withholding under 10CFR2.390. See ML13015A073

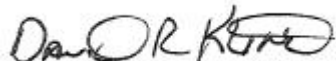
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In an effort to further enhance and further clarify guidance on the protection of unattended openings and pathways for the nuclear industry, a licensee recently conducted performance-based testing that focused specifically on two-dimensional openings and three-dimensional pathways. The conclusions of this testing and the recommended changes to NEI 09-05 are provided within the attached supplement. It is the industry's position that the separation between two-dimensional openings and three-dimensional pathways as defined, serves to improve the guidance and provide more specific criteria for licensees to identify and define exploitable openings and pathways that intersect security boundaries.

The industry requests that the NRC staff review and endorse the attached information on two-dimensional openings and three-dimensional pathways as supplemental guidance to NEI 09-05 by December 21, 2012.

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

Sincerely,



David R. Kline

c: Mr. Francis P. Peduzzi, NSIR/DSO/RSOB, NRC
Mr. Clay Johnson, NSIR/DSO/SPEB, NRC
Mr. Barry C. Westreich, NSIR/DSO, NRC
NRC Document Control Desk

Attachment