U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

ENHANCED SECURITY AT FUEL CYCLE FACILITY
SPECIAL NUCLEAR MATERIAL TRANSPORTATION SECURITY
SECURITY-FORCE FATIGUE AT NUCLEAR FACILITIES

10 CFR Parts 26 and 73 Draft Basis Document: Cost/Impact Considerations

Larry Harris, Senior Materials Program Manager
Office of Nuclear Security & Incident Response
Division of Security Policy

June 12, 2014

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Applicability of Proposed Changes

- Fixed-Site Physical Protection
  - Applicable to fuel cycle, non-power reactors and applicants
- Transportation Physical Protection
  - Applicable to fuel cycle, non-power reactors and applicants
- Safety/Safeguards Interface
  - Applicable to fuel cycle, non-power reactors and applicants, however not applicable to Part 70 licensees not subject to 10 CFR 70.72
- Fitness –for Duty
  - Applicable to security officers at Category I facilities

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Potentially Impacted Entities

- Licensees
- NRC
- State/Local/Tribal Governments
- Other: Environmental Impacts

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Potential Licensee Impacts

- Fixed Site and Transportation Security
  - Modifications for new requirements:
    - No major changes
    - For modifications needed to plans and procedures - More performance based regulations allow greater flexibility in program development
  - Material Attractiveness
    - Licensees that utilize material attractiveness would have an impact from modification of plans, procedures, programs etc.
    - However the overall regulatory burden would be reduced

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Potential Licensee Impacts

- Safety/Safeguards Interface
  - New requirement, may require inclusion or awareness of additional licensee disciplines for proposed changes
  - Existing work control / configuration management changes should be used, lessening the burden
- Fitness for Duty
  - New requirement for Category I fuel cycle licensees
  - Would apply only to security officers at the site
  - May be possible to leverage licensee payroll or commercial software to lessen compliance impacts
- For All Impacts
  - Potential initial licensee staff training, long-term training costs should be minimal

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Other Impacts

- NRC
  - Changes require supporting guidance development and follow-on inspections
- State/Local/Tribal Governments
  - Not required to adopt similar requirements, minimal impact
- Environmental
  - To be more fully considered during the proposed rule phase, no negative impacts anticipated

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Conclusion

We are soliciting you comments on costs/impacts to better inform our process and conclusions