



Draft Regulatory Basis – Sections 3, 4 and 5

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Objectives

- Improve consistency and clarity;
- Make generically applicable security requirements similar to those imposed by the security orders;
- Consider risk insights, operational oversight and inspection activities, and international guidance
- Use a risk-informed and performance-based structure



3 - Regulatory Problem

- Consistency
- Generic applicability of security orders
- Risk insights
- Use of risk-informed and performance-based structure



4 - Basis for Requested Changes

- Material categorization and attractiveness
- Fixed site physical protection
- Transportation physical protection
- Other changes



Concerns

- Orders
- Safety-Safeguards interface
- Corrective Action Program



Concerns

- Tables
- Weight percent (Dilution)
- Dose Rate Threshold



5 - Alternatives to Rulemaking Considered

- No action
- Issue generic communication
- Revise existing regulatory guidance
- Issue new licensee guidance
- Issue site-specific license conditions
- Issue security orders regarding fatigue



Questions