

RulemakingComments Resource

From: Cameron Goodwin <cgoodwin@rinsc.ri.gov>
Sent: Friday, October 03, 2014 1:58 PM
To: RulemakingComments Resource
Subject: NRC-2014-0118 Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportation
Attachments: Comments-Impact Enhanced Security basis doc.pdf

Good afternoon. Attached are comments from the Rhode Island Nuclear Science Center regarding NRC-2014-0118.

Thank you for your assistance.

Thank you,

Cameron

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Comments/Impact Re: Rhode Island Nuclear Science Center

Enhanced Security at Fuel Cycle Facilities

Regulatory Basis Document

1. General:

- A. The new criteria will bump us up to a Category II, Moderately dilute, Fixed Site.
- B. The Table 4-3 requirements do not appear to be consistent with the attachments

2. Table 4-3

A. Detection and Assessment

- 1) Will require a Central Alarm Station AND a secondary Alarm Station on or off site (Is this for all facilities?) This could be a significant problem for test reactor like ours.
- 2) Requires periodic patrols of outside areas. This might also be a significant cost incurrence to our facility.

B. Communication, "Continuous communication between CAS and on-site and off-site response force". Does this imply a means of communication other than phones?

3. Attachment 7, Category II – Moderately Dilute: Physical Protection Requirements

A. General performance objective

- 1) ...Maintain a physical protection program (PPP), **to include a security organization...** Does this imply security officers or is the staff the "security organization"? Table 4-3 does not appear to be consistent with this requirement.

B. Security Organization

- 1) Requires us to establish and maintain a security organization designed, staffed, trained, qualified and equipped to implement the PPP. Includes 1 individual on-site 24/7. This would be a very significant cost impact for us.

C. Detection and Assessment Systems

- 1) Alarm station requirements for continuously manned central alarm station on-site with bullet resisting walls, floors, ceilings and windows. Manning is with individual with no other duties. This would require the building of such a facility inside of our current facility. This is cost prohibitive and I am not sure how this is realistic to our facility.
- 2) Periodic patrols. Same comment as above.

D. Communication

- 1) Does require radio communication system and makes reference to security force, alarm stations on and off site. We are still confused about the on-site requirements. Does that have to be inside the building?

E. Response

- 1) Requires Licensee to establish and maintain trained, qualified, and equipped personnel capable of interrupting unauthorized activities until law enforcement arrives. Does this mean that the staff would now be required to have access to weapons? This sounds very dangerous. It would also be a significant cost and liability for the facility. Especially for test reactor where there are significant numbers of students touring and using the facility for classes.