

RulemakingComments Resource

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Please find my attached comments on RIN 3150-AJ41 (NRC-2014-0118), "Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportations; Security Force Fatigue at Nuclear Facilities".

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1	General Comment		<p>There is not enough detail within the draft regulatory basis to provide reasonable cost and impact estimates. As a rough estimate, the following key is provided for the questions / comments below:</p> <p>\$ = some cost / impact \$\$ = significant cost / impact \$\$\$ = major cost / impact with potential for facility closure \$\$\$\$ = major cost / impact likely to result in facility closure</p>	
2	General Comment		<p>Regarding regulation of non-power reactors, Section 104(c) of the Atomic Energy Act of 1954, reads as follows (in part): “The Commission is directed to impose only such minimum amount of regulation of the licensee as the Commission finds will permit the Commission to fulfill its obligations under this Act to promote the common defense and security and to protect the health and safety of the public and will permit the conduct of widespread and diverse research and development”.</p> <p>Noticeably absent from this document is any consideration of this unique constraint within the Act. The staff should reconsider whether inclusion of non-power reactors within the scope of this rulemaking effort is appropriate under the Act. If the staff determines inclusion of non-power reactors is warranted, the staff should provide detailed justification describing how they arrived at their conclusion, and details describing the process that will be used to ensure compliance with the Act under this rulemaking effort.</p>	
3	General Comment		<p>The resource burden associated with engaging in the various regulatory change processes is significant for most RTR facilities. This is evidenced by the lack of RTR licensee engagement in this rulemaking effort because most simply don’t have the resources to participate. Hence, the need for AEA 104(c) and the need for NRC compliance not only with the Act but with its intent.</p> <p>In the case of the UFTR, the resources required to engage in this regulatory process would be better utilized if focused on the training and research mission of the UFTR. However, because this proposed rulemaking effort has the potential to permanently shut down the facility, the facility has chosen to engage in this process in an effort to prevent a permanent shut down from occurring.</p>	\$\$
4	General Comment		<p>Current SGI and SGI-M regulations are directly related to current SNM possession thresholds. It’s reasonable to assume the staff intends to change the current SGI and SGI-M regulation thresholds as well</p>	\$

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			however no detail is provided in the draft regulatory basis on this topic.	
5	Title	<i>Rulemaking for Enhanced Security at Fuel Cycle Facilities; Special Nuclear Material Transportations; Security Force Fatigue at Nuclear Facilities</i>	The title of this document doesn't accurately convey the intended scope of the document.	
6	1-5	<i>Staff considers it appropriate to include the third rulemaking effort in parallel with the first two, at least during the development of the regulatory basis, because: (1) the same group of stakeholders have been involved with both rules during outreach and regulatory-basis development, and (2) consolidation and development of the regulatory basis would capitalize on efficiencies gained from the development of one regulatory basis versus two in an environment with limited resources/flat budgets.</i>	NRC budget and resource limitations are more appropriately discussed in Section 8.3. Noticeably absent from public stakeholder discussions are agreement states and non-reactor research and educational licensees who will also be greatly impacted by this rulemaking effort.	
7	4-1	<i>These new MC&A requirements were graded based on a 5,000-gram threshold of uranium-235, plutonium, and uranium-233 to exclude those licensed facilities which used small research quantities of SNM.</i>	The 5,000-gram threshold and research related exclusion were likely based on ensuring compliance with AEA 104(c). The staff should evaluate the impact of this prior precedent, and the regulatory basis behind it, and reconsider whether including non-power reactor facilities within the scope of this proposed rulemaking effort is appropriate and justified.	
8	8-1	<i>However, the regulations contain exemptions and exceptions under which material is not required to be protected within the three-category approach.</i>	As described later in the draft document, there are other regulations that require most of this same material to be protected within the three-category approach.	
9	9-2	<i>The objective of the physical protection system for Category II and III materials is to minimize the possibility for unauthorized removal of SNM and to facilitate location and recovery of missing SNM. The NRC's policy is not to require the physical protection systems of Category II and III facilities and non-power reactors to protect against the DBTs of theft or diversion and radiological sabotage. Rather, for these facilities, the NRC's policy is to require licensees to meet a set of requirements, the effectiveness of which have been evaluated based on NRC threat assessments as well as consequence and security assessments for these facilities.</i>	This combination of sentences is misleading. The NRC policy for Category II and III facilities is detailed in Regulatory Guide-5.59 which includes requirements for the use of physical protection systems. Additionally, the NRC security assessment of the UFTR (and others presumably) is very outdated. There have been several security related changes to the UFTR facility since then. Most notable of which is the conversion from HEU to LEU in 2006 in which the SNM strategic significance of the facility was reduced from moderate to low.	
10	9-2	<i>Access-authorization provisions are not specified in the existing regulations for Category II and III materials. The regulations do not have provisions to provide high assurance that individuals having access to other than Category I SNM and non-power reactors are trustworthy and reliable to use these materials as intended or will not aid or abet those with malevolent intentions.</i>	This combination of statements is confusing and contradictory. Non-power reactor access-authorization is covered in 73.57 and NPRs are also Cat II or III facilities (Ref. Table 1 in RG-5.59 and 10CFR73.2). Therefore, access-authorization provisions ARE specified in the existing regulations for Category II and III materials.	
11	12-5	<i>The first objective of this rulemaking is to improve regulatory consistency and clarity.</i>	Consistency, used as a justification for more prescriptive requirements, is very likely to be inconsistent with the risk/performance based goal since security measures may need to vary from site to site based on site and licensee specific parameters. This is particularly true for non-power	

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			<p>reactor facilities whose design and facility characteristics vary greatly.</p> <p>If it's an effective security strategy today then it should continue to be allowed under the new rules. By having so many more specific new proposed requirements, there is a large likelihood of unintentionally negating current practices or strategies which would otherwise be perfectly acceptable</p>	
12	17-2	<p><i>The combination of the changes in types of facilities and materials being regulated by the NRC and risk insights from these studies led the NRC to question the current categorization approach and consider the benefits of using a more risk-informed material attractiveness approach for SNM in the grading of physical protection requirements for fixed sites and transportation. This new approach would better define physical protection requirements for SNM based on the attractiveness of the material for its use in an improvised nuclear device (IND). Considering material attractiveness in the determination of appropriate physical protection requirements will enable the "rightsizing" of physical protection regulations that are specific to quantities of various forms and concentrations of SNM.</i></p>	<p>All current RTRs fall into the "moderately dilute" category under the draft proposal. Given this, explain how the material attractiveness approach will result in more risk-informed regulation for RTR licensees. How will this approach result in "rightsizing" of physical protection regulations for RTR licensees?</p> <p>The large majority of current RTR licensees fall into proposed Category III. Material attractiveness / dilution level is not considered in proposed Cat III. Given this, explain how the proposed changes result in more risk-informed regulation for Cat III RTR licensees. How will the proposed changes result in "rightsizing" of physical protection regulations for Cat III RTR licensees?</p>	
13	17-2	<p><i>In addition, following the events of September 11, 2001, the NRC and other governmental agencies undertook many studies (discussed below) to evaluate the risk and consequences associated with the physical protection of SNM and security at fuel cycle facilities and non-power reactors. These studies have identified new vulnerabilities and risks that were not considered in 1979 or in the existing regulations.</i></p>	<p>What "new vulnerabilities and risks" have been identified with respect to Fixed Site Physical Protection of LEU? What actions, if any, are being taken to address these new vulnerabilities and risks today? Have the affected licensees been formally notified of these new vulnerabilities and risks?</p>	
14	19-2	<p><i>Following the DOE effort, the NRC carried out a comprehensive review of NRC regulations and assessed past and current approaches to security licensing and inspections at SNM facilities. The results of this assessment were presented in SECY-09-0123, "Material Categorization and Future Fuel Cycle Facility Security-Related Rulemaking" (NRC, 2009).</i></p>	<p>The Commission disapproved in part the staff's request presented in SECY-09-0123. The RTR scope in SRM-SECY-09-0123 is limited "to those RTR licensees that still utilize HEU fuel". Additionally, none of the other background SRM documents referenced in the draft regulatory basis include RTR licensees within their intended scope.</p> <p>The staff should reconsider whether inclusion of RTR licensees utilizing LEU fuel within the scope of this effort is justified and defensible.</p>	
15	20-2	<p><i>In the current threat environment and in order to be relied on as an effective security feature, the external radiation dose-rate should be physically incapacitating before an adversary is able to complete a malicious act (i.e., theft or radiological sabotage). The study indicates that an external radiation dose-rate of 4,000 Rad/hour would incapacitate an individual in 60 minutes and an external</i></p>	<p>Rather than requiring a set minimum radiation dose rate, the staff should consider incorporating the flexibility included in INFCIRC/225, Revision 5. This IAEA document allows for adjustment of the dose threshold based on the threat (i.e. risk inform) and doesn't prohibit consideration of delay features where lower dose rates would still result in incapacitation. Additionally, INFCIRC/225, Revision 5, allows LEU</p>	

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		<i>radiation dose-rate of 10,000 Rad/hour would incapacitate an individual in 30 minutes.</i>	facilities this option as well.	
16	20-6	<i>Since the late 1970's, the way sabotage is defined and considered has evolved. For example, radiological sabotage is defined in Part 73 as any deliberate act directed against a plant or transport in which an activity licensed under the regulations in this chapter is conducted, or against a component of such a plant or transport which could directly or indirectly endanger the public health and safety by exposure to radiation. In Part 37, sabotage is defined as deliberate damage, with malevolent intent, to a Category 1 or Category 2 quantity of radioactive material, a device that contains a Category 1 or Category 2 quantity of radioactive material, or the components of the security system. While the definition of sabotage in Part 73 is broad, it focuses on acts against a facility or transport. The definition of sabotage in Part 37 focuses on the malevolent use of the radioactive material.</i>	<p>A stated intent of this proposed rulemaking is to make it more material based yet the Part 73 definition of sabotage remains focused on acts against the facility or transport rather than the material itself (like Part 37). Additionally, the proposed categorization require the licensee to assume an aggregated SNM quantity rather than allowing for segregation of SNM which could result in a lower category and more flexibility for the licensee. The “aggregated” quantity concept from new Part 37 should be incorporated to allow licensees further flexibility.</p> <p>Sealed PuBe sources totaling 500 grams or less are currently exempt from Part 73. The new Part 37, however, requires physical protection for a Category 2 quantity or greater. The need for redundant and overlapping physical security requirements is unclear and confusing. If new risk insights exist for smaller than Part 37 PuBe quantities, staff should consider revising Part 37 and keeping the Part 73 sealed PuBe source exemption in place.</p>	
17	22-1	<i>The physical protection of plutonium-238 and plutonium/beryllium sources is addressed by Part 37. However, other plutonium isotopes are not addressed by Part 37. This results in a regulatory gap that will be addressed by this rulemaking.</i>	If new risk insights indicate the need to protect other plutonium isotopes, the staff should consider revising the Part 37 table as a more straightforward means to address the potential regulatory gap.	
18	26-3	<i>Similarly, non-power reactors are currently required under 10 CFR 50.59, “Changes, Tests and Experiments,” to perform certain activities without obtaining a license amendment.</i>	Regulation 10 CFR 50.59 does not require NPR licensees to “perform certain activities without obtaining a license amendment”.	
19	26-5	<i>Therefore, staff concludes that a more formal program to ensure that fuel cycle facility and non-power reactor licensees properly assess the safety/safeguards interfaces is required in carrying out and managing these changes.</i>	The staff should support their conclusions with a detailed event based technical analysis that directly links this proposed increase in administrative regulatory burden to increased protection of the public and the environment.	\$
20	28-3	<i>The fourth objective of this rulemaking is to use risk-informed and performance-based approaches and structures.</i>	<p>In the proposed categorizations, higher risk materials and isotopes (HEU, Pu) are lumped together with lower risk materials (LEU), to assign a facility category. The objective of risk-informing would be better served, and more material based, if higher risk materials and isotopes were split out from the lower risk materials and isotopes. The material categorization approach used in Part 37 (Appendix A–Table 1) should be strongly considered.</p> <p>Additionally, the NRC should provide reasonable and credible event types (minor theft, major theft, sabotage, etc) by material type. Each event type can then be related to detection and response timeliness requirements in terms of material type.</p>	

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21	35-3	<i>Eliminate Special nuclear material of low strategic significance and add Category III quantity means:...</i>	The removal of the small sealed PuBe source exemption in combination with the LEU threshold reductions is likely to place small RTR facilities in jeopardy of closure with little to no demonstrated risk reduction or health and safety benefit.	\$\$\$\$
22	39-1	<i>The current requirement for sabotage mitigation of the facility at non-power reactors (i.e., §73.60(f)) would be retained. While spent non-power reactor fuel would not be subject to §73.51, staff concludes that additional protection beyond that described in 10CFR73.60(f) is not required to manage the sabotage risk of spent non-power reactor fuel above that provided to prevent theft or diversion.</i>	There is conflicting information in this draft regulatory basis regarding the need for sabotage mitigation at RTRs. For example, Attachment 9 requirements seem to be in direct conflict with the statements to the left.	
23	58-2	<i>It is expected that, for most existing licensees, the physical protection program activities currently undertaken would not significantly change and, therefore, the impact on most licensees will be small. Given the improvements provided by considering material attractiveness, it is possible that some facilities might choose to modify their current physical protection programs to take advantage of changes in physical protection requirements for material that is less attractive. This would be especially true for non-power reactors. In these cases, licensees would be impacted in making changes to security plans, implementing procedures, and physical protection equipment and barriers, but the overall burden would be reduced.</i>	<p>Please provide examples illustrating how current RTR “overall burden would be reduced”. Please provide examples where consideration of material attractiveness would be “especially” advantageous for any current non-power reactor licensee.</p> <p>This reviewer is unaware of any NRC regulated non-power reactor licensee licensed to possess any significant quantity of “highly dilute SNM”, or any non-power reactor licensee who would be subject to relaxed fixed-site physical protection requirements as a result of this proposed rulemaking. Clearly, the intent of this proposed rulemaking is to significantly increase SNM physical protection requirements, particularly on those RTR facilities with low strategic significance.</p>	
24	Attachment 8 General Comment		Part 73.67(d), requirements for SNM of moderate strategic significance, is referenced throughout this attachment. Please provide justification for the intended expansion of these requirements to include SNM of low strategic significance / Cat III.	
25	Attachment 8 General Comment		Currently, 10 CFR 73.67(f) has four security objectives (low strategic significance – not including transportation requirements). For the same quantity and type of material, this proposed rulemaking would appear to increase that to approximately 75 security objectives / requirements with no apparent change in risk. This drastic increase is inconsistent with the goal of better risk informing security requirements.	
26	H-1-1	<i>Licensees should establish and maintain a physical protection program, to include a security organization, which will have as its objective to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety</i>	<p>What constitutes “high assurance” and why is this necessary for such small SNM quantities? How does this differ from the assurances provided by the current regulations / regulatory guidance?</p> <p>Please provide examples of hypothetical (but credible) security events involving Cat III SNM that would be “inimical to the common defense and security” and “constitute an unreasonable risk to the public health and safety”. Lowest consequence Cat III example? Highest</p>	\$\$\$

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			consequence Cat III example? Please provide an example of “reasonable risk” for the same Cat III SNM.	
27	H-1-2	<i>The physical protection program should be designed to timely detect attempts to remove of SNM and notify local law enforcement agencies to allow recovery of the SNM.</i>	Please explain how timeliness of detection will be related to risk in terms of event type (minor theft, major theft, etc) and how this will differ under the proposed changes from the current RG-5.59 guidance.	
28	H-1-3	<i>Licensees should analyze and identify site-specific conditions that may affect the specific measures needed to implement the requirements of this section and shall account for these conditions in the design of the physical protection program.</i>	Please identify the specific analyses and design requirements intended by this objective.	\$\$
29	H-1-4	<i>In addition to these fixed-site requirements, the NRC may require, depending on the individual facility and site conditions, alternate or additional measures deemed necessary to protect against theft or diversion of Category III SNM.</i>	Please explain what “alternate or additional measures” may be “deemed necessary” using credible examples. Please explain how these measures would be imposed (unilaterally by the staff, order process, CM/CAL, ??).	\$\$\$
30	H-1-5	<i>Licensee should use the site corrective action program or security event log to track, trend, correct and prevent recurrence of failures and deficiencies in the physical protection program.</i>	Please identify the specific requirements intended by this objective.	\$\$
31	H-1-6	<i>Implementation of security plans and associated procedures should be coordinated with other onsite plans and procedures to preclude conflict during both normal and emergency conditions.</i>	Please identify the specific requirements intended by this objective.	\$\$
32	H-1-7&8	<p><i>Licensees should develop, maintain and implement a Physical Security Plan and implementing procedures that describes how they will meet the performance objective and physical protection requirements. [73.67(c)(1), 73.67(f)(4)]</i></p> <p><i>NRC approval of the Physical Security Plan is required for the following types and quantities:</i></p>	<p>Currently, no NRC approved Physical Security Plan (PSP) is required by regulation for less than 10 kg of SNM of low strategic significance. Security procedures may be used in these cases to ensure compliance with 73.67.</p> <p>With respect to AEA 104(c), please provide a justification for the significant increase in regulatory burden that will accompany the proposed reductions in threshold quantities in terms of this proposed PSP administrative requirement.</p>	\$\$\$
33	H-2-1	<i>The security organization should follow a management system to oversee the physical protection program including having at least one member (onsite and available at all times) to direct activities and request off-site assistance.</i>	Please provide justification for this proposed requirement. Note that the costs associated with implementing this proposed requirement would likely result in decommissioning of the facility.	\$\$\$\$
34	H-2-2	<i>If member of the security organization are armed, the security plan should describe the training, qualification and requalification program.</i>	Please identify the specific requirements intended by this objective. What is required in the case where local LEOs are part of the security organization?	\$\$
35	H-2-4	<i>The controlled access area perimeter should include a physical barrier that is designed and constructed to limit access into the controlled access area, and channel personnel, vehicles and materials to designated access control portals.</i>	Please identify the specific requirements intended by this objective.	\$ to \$\$\$\$
36	H-2-5	<i>Penetrations through the controlled access area barrier should be secured and monitored to prevent and detect exploitation of the</i>	Please define the term “penetration” in terms of security functions and explain why penetrations that are secured also need to be monitored.	\$\$\$

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		<i>openings.</i>		
37	H-2-6	<i>All exterior areas within the controlled access area should be periodically checked to detect and deter unauthorized personnel, vehicles and materials.</i>	Please define the area described by the phrase “exterior areas within the controlled access area” and explain why these specific areas should be periodically checked.	\$\$\$
38	H-2-7	<i>Category III SNM should be processed and stored within a controlled access area. [73.67(f)(1) – 73.67(d)(1)]</i>	Part 73.67 is silent on how SNM should be “processed”. Is use of the term “processed” intentional here?	
39	H-2-11	<i>Licensees should limit unescorted access to the controlled access area to only individuals who require unescorted access to perform assigned duties and responsibilities.</i>	Please explain why Part 73.57 is absent in Attachment 8 but included in Attachment 9.	
40	H-3-1	<i>Access control systems should be designed to accommodate the potential need for rapid ingress or egress of authorized individuals during emergency conditions or situations that could lead to emergency conditions. Licensees should implement security procedures to ensure that authorized emergency personnel are provided prompt access to affected areas and equipment.</i>	Please define and justify the proposed “rapid ingress” and “prompt access” requirements.	\$\$\$
41	H-3-4	<i>Access control devices should only be issued to individuals with unescorted access that require those devices to perform official duties and responsibilities. Licensees should maintain a list of individuals which have been issued access control devices and implement a process to account for access control devices at least annually. Upon less than favorable termination of employment, access control devices that were issued or accessed by that employ should be changed</i>	Please define “access control device”. Please define “less than favorable termination” in terms of the relationship to CAA access control. Please provide additional detail to better define the proposed requirement to change “...access control devices that were issued or accessed by that employ...”.	\$\$
42	H-3-6&7	<i>Licensees should implement a numbered photo identification badge program for all individuals authorized unescorted access to controlled access areas. Badges should be clearly displayed by all individuals inside controlled access areas. [73.67(d)(5)]</i> <i>Licensees should maintain a record, to include name and areas to which unescorted access is granted, of all individuals issued photo identification. [2]</i>	Please explain how proposed badging requirements are justified at small Cat III facilities where unescorted CAA access is limited to a very small number of individuals who are well known to each other as well as to the security organization.	\$
43	H-3-8	<i>Licensees may permit escorted access to controlled access areas to individuals who have not been granted unescorted access. Licensees should develop and implement procedures for processing, escorting and controlling visitors which include confirmation of identity, listing of visitors, issuance of a visitor badge, establishing escort ratios, monitoring visitor activities, and escorting visitors at all times. [73.67(d)(7)]</i>	Please identify the specific requirements intended to be imposed by the phrase “controlling visitors”. Note that “visitors” at the UFTR includes students. Unlike commercial nuclear facilities, student visitors are <u>integral</u> to the research, training, and education missions of the UFTR. Please explain how proposed badging requirements are justified at small Cat III facilities where unescorted CAA access is limited to a very small number of individuals who are well known to each other as well as to the security organization.	\$\$
44	H-3-9	<i>Licensees should ensure that all escorts are trained to perform</i>	Please define “means of timely communication”. Please identify the	\$\$

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		<i>escort duties, have unescorted access to areas in which they perform escort duties, and have a means of timely communication with security personnel to summon assistance if needed.</i>	training requirements intended.	
45	H-4-1	<i>Licensees should establish and maintain intrusion detection and assessment systems that satisfy the general performance objective and requirements and provide the capability to detect and assess unauthorized persons and facilitate the protective strategy. [73.67(d)(3)]</i>	Please define “assessment systems”. Please explain what it means to have the “capability” to “assess unauthorized persons”. Please explain what it means to “facilitate the protective strategy” in terms of the proposed required security systems.	\$\$\$
46	H-4-9	<i>A designated member of the security organization should be capable of calling for assistance, at all times, in accordance with security plans and implementing procedures. [73.67(d)(9)] Communication should be by two-way voice communication either directly or through an intermediary to local law enforcement using two independent means using different technologies.</i>	Please explain in detail what is intended or define each of the following: “A <u>designated member</u> of the security organization should be <u>capable</u> of calling for assistance, <u>at all times</u> , in accordance with security plans and implementing procedures”. “Communication should be by <u>two-way voice communication either directly or through an intermediary</u> to local law enforcement <u>using two independent means using different technologies</u> .”	\$\$
47	H-4-10	<i>All on-duty security force personnel should be capable of maintaining continuous communication with the individual responsible for requesting assistance. All personnel escorts should maintain timely communication with security personnel.</i>	What does “maintain continuous communication capability” entail? What does “maintain timely communication” entail? Note that this proposed escort communication requirement is different than the proposed escort requirement to “have a means of timely communication” in Comment 44 above.	\$\$
48	H-4-11	<i>Non-portable communications equipment should remain operable from independent power sources in the event of loss of normal power.</i>	Please identify the specific requirements intended to be imposed by the statement.	\$\$
49	H-5-1	<i>Licensees should identify site areas where communication could be interrupted or cannot be maintained and should establish alternative communication measures for those areas.</i>	Please identify the specific requirements intended to be imposed by the statement.	\$\$
50	H-5-3	<i>To the extent practicable, licensees should document and maintain current agreements with applicable law enforcement agencies to include estimated response times and capabilities. [2] To the extent practicable, licensees should conduct annual local law enforcement site familiarization activities to include a review of the protective strategy and on-site and off-site response procedures, and joint response exercises.</i>	Please identify the specific requirements intended to be imposed by the statements.	\$\$
51	H-5-4	<i>Licensees should review each element of the physical security program at least every 24 months based upon site-specific analysis, assessments or other performance indicators. The reviews should be conducted by individuals independent of the physical security program.</i>	Please identify the specific requirements intended to be imposed by the statements.	\$\$
52	H-5-5	<i>Reviews should be conducted within 12 months following initial implementation or a change in personnel, procedures, equipment</i>	Please identify the specific requirements intended to be imposed by the statements.	\$\$

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		<i>or facilities that potentially could adversely affect security.</i>		
53	H-5-7	<i>These reports should be maintained in an audible form and available for inspection.</i>	Term “audible” should be “auditable”?	
54	H-6-3	<i>Compensatory measures should be implemented with specific time frames necessary to meet the general performance objective and requirements and described in security plans and should not be used in lieu of performing timely maintenance.</i>	The statement “...and should not be used in lieu of performing timely maintenance” is overly subjective. Comp measures may, in fact, be required in lieu of maintenance until the maintenance can be completed. Maintenance might be unavoidably delayed (i.e. not timely) as a result of parts or resource issues.	\$\$\$
55	Attachment 9 General Comment		As written, this Attachment would effectively ratchet up security system / security organization response requirements from Cat III to Cat 1 levels. This level of protection is inconsistent with the training and research mission of the UFTR.	\$\$\$\$