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General Use of Locks in Protection and Control of Facilities and Special Nuclear Materials, Classified Matter, and Safeguards Information

Comment On: NRC-2014-0276-0001

General Use of Locks in Protection and Control of Facilities and Special Nuclear Materials, Classified Matter, and Safeguards Information

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Comment on FR Doc # 2014-30738

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General Comment

Comments on DG-5027 (RG 5.12 Rev. 1)

Regulatory Position C.1 covers the selection and use of locks to protect National Security Information, Restricted Data, and Formally Restricted Data and references 10 CFR 95.25(a).

10 CFR 95.25(a) states:

(a) Secret matter, while unattended or not in actual use, must be stored in--

- (1) A safe, steel file cabinet, or safe-type steel file container that has an automatic unit locking mechanism. All such receptacles will be accorded supplemental protection during non-working hours; or
- (2) Any steel file cabinet that has four sides and a top and bottom (all permanently attached by welding, rivets, or peened bolts so the contents cannot be removed without leaving visible evidence of entry) and is secured by a rigid metal lock bar and an approved key operated or combination padlock. The keepers of the rigid metal lock bar must be secured to the cabinet by welding, rivets, or bolts, so they cannot be removed and replaced without leaving evidence of the entry. The drawers of the container must be held securely so their contents cannot be removed without forcing open the drawer. This type of cabinet will be accorded supplemental protection during non-working hours.

The current regulation and the Draft Regulatory Guide contradicts what is written in the National Industrial Security Program Operators Manual (NISPO), DoD 52200.22-M, dated February 28, 2006 Incorporating Change 1, March 28, 2013. The NISPO only allowed the use of non-GSA security storage containers prior to October 1, 2012. After the effective date, only GSA approved security storage containers may be used to protect this type of information.

NISPO Section 5-303 states:

SUNSI Review Complete

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Add= A. Tardiff (AXT1)

M. Baysie (MMBI) 3/16/2015

SECRET Storage. SECRET material shall be stored in a GSA-approved security container, an approved vault, or closed area. Supplemental controls are required for storage in closed areas. The following additional storage methods may be used until October 1, 2012:

- a. A safe, steel file cabinet, or safe-type steel file container that has an automatic unit locking mechanism. All such receptacles will be accorded supplemental protection during non-working hours.
- b. Any steel file cabinet that has four sides and a top and bottom (all permanently attached by welding, rivets or peened bolts so the contents cannot be removed without leaving visible evidence of entry) and is secured by a rigid metal lock bar and an approved key operated or combination padlock. The keepers of the rigid metal lock bar shall be secured to the cabinet by welding, rivets, or bolts so they cannot be removed and replaced without leaving evidence of the entry. The drawers of the container shall be held securely so their contents cannot be removed without forcing open the drawer. This type of cabinet will be accorded supplemental protection during non-working hours.

SCE&G recommends DG-5027 be revised to reflect the language identified in the current revision of the NISPOM. In addition, we recommend 10 CFR 95.25(a) be updated also.