

NOTE: The discussion below is provided in order to facilitate dialog on requirements associated with 10 CFR 50.54(hh)(1). This document, in and of itself, is not intended to, and should not be considered to contain NRC regulatory positions.

Discussion on Final Report Associated with Temporary Instruction (TI) 2515/186, "Inspection of Procedures and Processes for Responding to Potential Aircraft Threats"

Background

- TI 2515/186 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12170B026) was issued on August 30, 2012, in order to support a review of licensees' procedures and processes required by Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(hh)(1). 10 CFR 50.54(hh)(1) requires that power reactor licensees develop, implement, and maintain procedures for responding to potential aircraft threats.
- Inspections were completed by May 2014. The final report was issued on June 17, 2015 (ADAMS Accession No. ML15163A252). Tabulated and overall results of the TI are considered Official Use Only (OUO) since the results contain security related information. Site specific inspection reports were issued during the course of TI performance.

Actions Outlined in TI Final Report

- Retain TI 2515/186 results for consideration in potential future rulemaking efforts.
- Reiterate regulatory requirements of 10 CFR 50.54(hh)(1) with external stakeholders at July 15, 2015 Reactor Oversight Public (ROP) public meeting.
- Forward TI inspection results to the Regions for consideration in dispositioning identified issues.

Reiteration of Regulatory Requirements of 10 CFR 50.54(hh)(1)

- 10 CFR 50.54(hh)(1)(i): Requirement to contact the NRC if threat information is received from another source.

10 CFR 50.54(hh)(1)(i) requires that procedures address "Verification of the authenticity of threat notifications." The Federal Register Notice (FRN) associated with the rule (74 FR 13926, 13956) states "...if the threat information is not received from the NRC Headquarters Operations Center, licensees are required to at least contact the NRC Headquarters Operations Center for assistance with verifying callers' identities or the veracity of threat information."

This provision was inspected under section 03.01(a) of TI 2515/186. The TI considered if procedures described what actions to take to authenticate a call if an aircraft threat notification is received from a source other than the NRC operations center. A part of this consideration was whether or not procedures indicated to contact the NRC if the NRC is not the original source of the threat information.

- 10 CFR 50.54(hh)(1)(iii): Requirement to provide periodic updates to offsite response organizations as appropriate.

10 CFR 50.54(hh)(1)(iii) requires that procedures address "Contacting all onsite personnel and applicable offsite response organizations." The FRN associated with the rule (74 FR 13926, 13956) states "Licensees are expected to provide periodic updates to offsite response organizations during the pre-event notification period as appropriate."

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This provision was inspected under section 03.01(c) of TI 2515/186. The TI considered if procedures called for periodic updates on the status of the threat to onsite personnel and offsite response organizations.

- 10 CFR 50.54(hh)(1)(v): For non-centralized lighting, requirement to prioritize lighting to be turned off based on the estimated time available when appropriate.

10 CFR 50.54(hh)(1)(v) requires that procedures address “Measures to reduce visual discrimination of the site relative to its surroundings or individual buildings within the protected area.” The FRN associated with the rule (74 FR 13926, 13956) states “Licensees are expected to use centralized lighting controls or develop prioritized routes that allow personnel to turn off different sets of lights depending on available time when appropriate.”

This provision was inspected under section 03.01(e) of TI 2515/186. For non-centralized lighting, the TI considered if the licensee identified the prioritized lighting to extinguish based on the estimated time available.

- 10 CFR 50.54(hh)(1)(vi): Requirement to address dispersal of equipment and personnel.

10 CFR 50.54(hh)(1)(vi) requires that procedures address “Dispersal of equipment and personnel, as well as rapid entry into site protected areas for essential onsite personnel and offsite responders who are necessary to mitigate the event.” The FRN associated with the rule (74 FR 13926, 13956) states “To the maximum extent possible after an imminent aircraft threat notification, the rule also requires licensees to develop, implement, and maintain procedures for dispersing appropriate personnel and equipment (e.g., survey vehicles and emergency kits) to locations throughout their sites.”

This provision was inspected under section 03.01(f) of TI 2515/186. The TI considered if procedures include information on the dispersal of personnel and equipment important for accomplishing post-impact mitigative actions. A part of this consideration also took into account whether or not equipment was already dispersed.

- 10 CFR 50.54(hh)(1)(vi): Requirement to address rapid entry into site protected areas.

10 CFR 50.54(hh)(1)(vi) requires that procedures address “Dispersal of equipment and personnel, as well as rapid entry into site protected areas for essential onsite personnel and offsite responders who are necessary to mitigate the event.” The FRN associated with the rule (74 FR 13926, 13957) states “Licensees are required to develop procedures to facilitate the rapid entry of appropriate onsite personnel as well as offsite responders into their protected areas to deal with the consequences of an aircraft impact.”

This provision was inspected under section 03.01(f) of TI 2515/186. The TI considered if specific measures are proceduralized to facilitate rapid protected area access for relocated critical onsite personnel or essential offsite responders needed for mitigating an aircraft impact.

- 10 CFR 50.54(hh)(1)(vi): Requirement that onsite protective actions for site personnel be based on an analysis.

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10 CFR 50.54(hh)(1)(vi) requires that procedures address “Dispersal of equipment and personnel, as well as rapid entry into site protected areas for essential onsite personnel and offsite responders who are necessary to mitigate the event.” The FRN associated with the rule (74 FR 13926, 13956) states “It is expected that licensees will conduct an analysis and develop a decision-making tool for use by shift operations personnel to assist them in determining the appropriate onsite protective action for site personnel for various warning times and site population conditions (e.g., normal hours, off normal hours, and outages).”

This provision was inspected under section 03.01(f) of TI 2515/186. The TI considered if there was an analysis or other justification for the personnel relocation strategy based on the available warning time and site population.

- 10 CFR 50.54(hh)(1)(vii): Requirement to direct responding licensee personnel to pre-identified assembly areas outside the site protected areas.

10 CFR 50.54(hh)(1)(vi) requires that procedures address “Recall of site personnel.” The FRN associated with the rule (74 FR 13926, 13957) states “...procedures shall describe the licensee's process for initiating off-shift recalls during the pre-event notification period and for directing responding licensee personnel to pre-identified assembly areas outside the site protected areas.”

This provision was inspected under section 03.01(g) of TI 2515/186. The TI considered if the recall process designated an assembly area off-site. A part of this consideration also took into account whether or not pre-identified assembly areas were established.