

September 16, 2015

MEMORANDUM TO: Anne T. Boland, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Michael C. Layton, Director/**RA**/
Division of Security Operations
Office of Nuclear Security and Incident Response

SUBJECT: PUBLIC RELEASE OF FLOOR PLANS CONTAINED IN
FINAL SAFETY ANALYSIS REPORTS AND UPDATES

On September 1, 2015, the Office of Nuclear Security and Incident Response, Division of Security Operations (DSO) was asked to provide guidance on the public release of floor plans included within Final Safety Analysis Reports (FSAR), updates and Emergency Plan documents. The request for guidance also asked that DSO include the basis for the guidance.

As with any decision related to information protection, few are absolute and without exceptions. When the Commission issued Staff Requirements Memorandum (SRM) SECY-15-0032, dated June 15, 2015, it approved the staff's recommendation to prospectively and proactively apply the U.S. Nuclear Regulatory Commission's (NRC's) Sensitive Unclassified Non-Safeguards Information (SUNSI) Policy to the review, release, and withholding of fire protection and emergency preparedness documents. Fire protection and emergency preparedness documents containing floor plans will not be an exception to that policy.

Licensee floor plans that do not reflect pathways or routes of travel to identified vital equipment or vital areas can be publicly released, consistent with Commission direction. Conversely, floor plans that provide the reader with a visual path to identified vital equipment or vital areas should not be publicly released. Floor plans that provide the reader a detailed layout of the constructed pathways to vital equipment or vital areas, which has been identified within the layout drawing, could reasonably be expected to aid an adversary in the planning of a malevolent act. Accordingly, that type of information should be withheld from public disclosure, as prescribed by the NRC SUNSI policy.

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(301) 415-2278

If a licensee was to submit an FSAR, fire protection, or emergency preparedness document containing a layout drawing depicting vital equipment or vital areas generically (i.e., A, B, C or 1, 2, 3), an attachment could be included with the document that specifically identified the generic labels contained within the FSAR, or other document. The attachment itself (containing text associating it with the FSAR, UFSAR, or document) would be considered "Security-Related" and justifiably withheld from public disclosure, as prescribed by the NRC SUNSI policy.

If you have any questions regarding the SUNSI policy or how it should be applied to FSAR, UFSAR, or emergency preparedness documents that are submitted to the NRC, please contact Mr. Darryl Parsons, Chief, Information Security Branch, at (301) 415-7751.

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