

## Regulatory Guide Periodic Review

Regulatory Guide Number: **5.44**

Revision number: **3**

Title: **Perimeter Intrusion Alarm Systems**

Office/Division/Branch: **NSIR/DSP/SPSB**

Technical Leads: **James Vaughn & Al Tardiff**

Staff Action Decided **Reviewed with issues identified for future consideration**

**1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?**

The document is technically out of date and does not reflect the current science and application, testing and acceptance of intrusion detection systems. The document does not account for new technologies that require different approaches related to testing and acceptance. For example, more recent alarm system technologies require physical penetration testing techniques versus the two proximity testing techniques currently discussed in the document. The document is limited in regulatory scope and needs to be expanded to be applicable to fuel cycle, decommissioning and fuel facilities.

**2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?**

If this Regulatory Guide is not updated, stakeholders (licensees and applicants) would not have up-to-date guidance for testing and accepting a wide range of intrusion detection sensors and technology. This currently leads to a gap between the guidance and the newer technologies inspectors are encountering in the field. This gap results in confusion in terms of what the staff finds acceptable for the conduct of testing and acceptance techniques and site specific procedures. Not updating this RG would add additional time and effort for inspectors and create inconsistencies. In addition, planned Part 73 rulemaking efforts will provide direction as whether to review, consolidate in to RG 5.76 or withdraw the guide.

**3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?**

Approximately 0.20 full-time equivalency (FTE) will be required to complete the review and update of the regulatory guide. This may be accomplished with either internal personnel or contractor support.

**4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

The staff reviewed the document for current issues and limitations and plans to revise RG 5.44 as part of a larger Part 73 rulemaking effort currently under way by NSIR/DSP/FCTSB.

**5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

The staff plans to complete the revision of the guide as part of a Commission-directed Part 73 rulemaking, which is estimated to be finalized in late 2017 - early 2018.

**Note: This review was conducted in September 2015 and reflects the staff's plans as of that date. These plans are tentative and subject to change**