

Response to Public Comments on Draft Regulatory Guide (DG)-5027
**“GENERAL USE OF LOCKS IN THE PROTECTION AND CONTROL OF: FACILITIES,
RADIOACTIVE MATERIALS, CLASSIFIED INFORMATION, CLASSIFIED MATTER, AND
SAFEGUARDS INFORMATION”**
Proposed Revision 1 of Regulatory Guide (RG) 5.12

On January 2, 2015, the NRC published a notice in the *Federal Register* (80 FR 53) that Draft Regulatory Guide, DG-5027 (Proposed Revision 1 of RG 5.12), was available for public comment. The public comment period ended on March 3, 2015. The NRC received comments from the organizations listed below. The NRC has combined the comments and NRC staff responses in the following table.

Comments were received from the following:

D. Kline, Dir., Security
Nuclear Energy Institute (NEI)
1201 F Street NW, Suite 1100
Washington DC 20004
ADAMS Accession No. ML15061A107

Thomas Collins
SCE&G
V. C. Summer
14368 State Highway 213
Jenkinsville, SC 29065
ADAMS Accession No. ML15082A276

Mike Welling
Director, Radioactive Materials Program
Virginia Dept. of Health
109 Governor St., 7th Floor
Richmond, VA 23219
ADAMS Accession No. ML15069A236

Tim Zibell
Project Manager, Field Support Team Lead
DOD Lock Program
NAVFAC Engineering & Expeditionary Warfare Center
(EXWC)
1100 23rd Avenue, Code C18
Port Hueneme, CA 93043
ADAMS Accession No. ML15065A218

Todd Henderson
First Energy Nuclear Operating Company (FENOC)
341 White Pond Drive
Mail Stop: A-WAC-B 1 Co
Akron, OH, 44320
ADAMS Accession No. ML15082A277

Organization of Agreement States (OAS)
Michael Welling, OAS Chair
Director, Radioactive Materials Program
Virginia Dept. of Health
109 Governor St., 7th Floor
Richmond, VA 23219
ADAMS Accession No. ML15065A217

Commenter	Section of DG-5027	Specific Comments (All comments are directly quoted)	NRC Resolution
1-D. Kline	Title of document and Purpose	<p>The document Title and Purpose would indicate that guidance within speaks to use of locks for the protection of safeguards information (SGI). However, upon review, there appears to be no actual guidance relating to use of locks for protection of SGI. Rightfully so, the guidance for locks for the purpose of SGI storage resides in RG 5.79, Protection of Safeguards Information. To avoid possible confusion with RG 5.79, consider removing all indication of applicability to protection of safeguards information within document.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment.</p> <p>The NRC staff disagrees with the comment for two reasons. First, the guidance does discuss locks for the use of the protection of SGI. Section C.2. of the regulatory guide is titled “Selection and Use of Locks To Protect SGI” and explicitly contains guidance on the types of locks to be used. In addition, the guidance is consistent with RG 5.79 <i>Protection of Safeguards Information</i>.</p> <p>Second, the NRC staff’s revised RG 5.12 is comprehensive because it discusses all the security-related aspects of lock use in the regulations applicable to specific licensees. The inclusion of SGI protection guidance is a part of this comprehensive approach.</p> <p>The NRC staff agrees that the title should be changed to include the revised scope of the document. Therefore, the title is changed to: “General Use of Locks in the Protection and Control of: Facilities, Radioactive Materials, Classified Information, Classified MATter, and Safeguards Information.” Besides control and protection of facilities and special nuclear material (SNM), the revised scope of the guide includes control and protection of: (1) classified information/matter, (2) safeguards information, (3) an aggregated Category 1 or Category 2 quantity of radioactive material listed in Appendix A to 10 CFR Part 37, and (4) spent fuel.</p>
2-D. Kline	Throughout Document	<p>There appears to be no risk informed graded approach with regard to the level or type of SNM being protected. There are implications that the reg. guide is applicable to those SNM of strategic or formula quantity, sources or spent fuel.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment. Text was revised.</p> <p>The NRC staff disagrees with the comment regarding the type of SNM. Section C.3.b.(5), (6) and (7) discuss lock system characteristics specifically for SNM of formula quantity, and moderate strategic significance. Note that a material access area is discussed in Sections C.3.b. (5) and</p>

Commented [LL1]: Because we edited the title I think we should be saying agrees in part and disagrees in part.

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		Carefully resolve the applicability and scope of the entire reg. guide and then where appropriate with a graded risk approach regarding the different levels of either material or information being protected.	<p>(6) and that a formula quantity of SNM always resides within a material access area.</p> <p>The NRC staff disagrees with the comment in regard the guide not presenting an informed graded approach. Lock systems are discussed for different types of SNM and areas commensurate with the potential risk of a successful adversary event. For example, Section C.3.b.(5), (6) and (7) discuss high-in-potential-consequence SNM and Section C.3.b.(11) discusses general purpose emergency egress lock systems. Therefore, the guide does discuss a graded approach for the design and implementation of locks used in a physical protection system.</p> <p>The NRC staff agrees with the comment in regard to the applicability and scope of the RG. The guidance has been revised to organize the application of lock systems by partitioning Section C into three sections: 1) classified information/matter protection, 2) protection of SGI, and 3) Selection and Use of Locks and/or a Lock and Key Control System to Protect Facilities/SNM under Part 73, Radioactive Materials, Spent Nuclear Fuel, High Level Waste, SGI, NSI, FRD, and RD.</p>
3-D. Kline	Starting at page 5 through page 19. Reference numbers are incorrect.	Reference numbers are incorrect.	The NRC staff agrees with the comment. Reference numbers have been adjusted to reflect the correct referenced information.

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4-D. Kline	Page 1, Section A. Introduction, Subsection – Purpose, and Page 12 Section 3, “Selection and Use of Locks to Protect Facilities and SNM under Part 73”. There are parts that pertain to 10CFR73.55, but this section continues on page 13, letter b. “The following guidelines are acceptable for the selection and use of locks in the protection of SNM	<p>Throughout the entire document, there seems to be a co-mingling of guidance that pertains to subjects varying from the production and storage of SNM, to the protection of NSI, RD to power plants. For example, there are parts that talk about Facilities Controls. Are they talking about Nuclear Power Plant or a Facility that stores SNM?</p> <p>Suggest a better separation of guidance that would be more specific for the various organizations that can be affected by this guidance.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment. Text was revised.</p> <p>The NRC staff disagrees with the comment in regard to the guide discussing the term “Facilities Controls.” The term “Facilities Controls” is not found in the document.</p> <p>The NRC staff agrees with the comment regarding the comingling of guidance (e.g., from power reactor applications to the protection of SGI). To clarify the applicability to various subjects; Section C of the guidance has been partitioned. See the NRC response to comment number 2 from D. Kline.</p>
5-D. Kline	Key Locks (general):	<p>Control keys should only be issued to the individual in charge of the lock program.</p> <p>Control keys should only be issued to an individual authorized by the lock/key program manager. Individuals who are authorized to handle control keys should be tracked “for integrity based terminations.”</p>	<p>The NRC staff agrees in part and disagrees in part with the comment. Changes were made to the text.</p> <p>The NRC staff agrees with the comment in regard to the control key being a restricted access item. The proposed text of “Control keys should only be issued to individuals authorized by the lock/key program manager” is accepted with modification as “Control keys should only be issued to</p>

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			<p>individuals authorized by the person in charge of the lock program.”</p> <p>The NRC staff disagrees with the comment in regard to the use of the term “integrity based terminations.” The comment of the proposed text of “Individuals who are authorized to handle control keys should be tracked for integrity based termination” uses the unfamiliar term “integrity based terminations.” However, the text is modified in Section B, subheading “Control of Locks, Keys, Key Cards, Combinations, and Related Equipment” to include terms used in the Part 73 regulations: “...licensees should develop, implement, and maintain a formal process for distributing locks, keys, key cards, combinations, and related equipment to only authorized personnel. Furthermore, when an individual’s authorization for access has been revoked or suspended or has left employment duty, under less than favorable conditions, licensees should reduce security risk by: accounting for spare lock components, changing keys, deny function of specific access cards to key card processing systems, and change combinations on certain lock systems.” In addition, section C.3.c.(16)ii, states: “If an employee is transferred under less than favorable condition or has an access authorization terminated or suspended under less than favorable conditions, then the keys, key cards, key codes, control keys, combinations, and related equipment to which an employee had access should be changed. However, a licensee need not replace the affected locks.”</p> <p>10 CFR 73.55(g)(6)(i)(D) states that an employee leaving employment duty “...under less than favorable conditions...” constitutes the initiating event that warrants changing lock/key parameters. Therefore, the less than favorable aspect as discussed in 10 CFR 73.55 is migrated into the two text areas that are pointed out in this text box.</p>
6-D. Kline	Key Locks (general):	The termination of an individual for integrity/loss of trustworthiness based issues	The NRC staff agrees in part and disagrees in part with the comments. Changes were made to the text.

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		<p>should initiate a core change, not just the termination of a general employee who had controlled access to the key or keyway.</p> <p>In addition, termination of an employee for trustworthiness or integrity based concerns who had access to a master key would require changing the bitting of all locks set for the master key within a rolling 5 day period.</p>	<p>The NRC staff agrees with the comment regarding the initiation of a core change due to employee concerns. Core change is only recommended to be accomplished when the condition as described in section C.3.c.(16)iii. occurs: “[i]f a core, key, or card is lost or missing; the lock, core, key, or card has been compromised; or unrecorded keys or cards are found, then locks should be changed or cores replaced and an inventory conducted as soon as possible. In a lock system that is master-keyed, a complete remastering of the system should be conducted whenever a core, card, master, control key, or a lock is lost or compromised.”</p> <p>To accommodate the recommended core change action due to the concern of an employee's conduct, the following text has been added: “In addition, these change processes should also be conducted after an employee who had access to these components of a lock/key system is terminated or loses that access under less than favorable conditions.” Therefore, the comment of “The termination of an individual for integrity/loss of trustworthiness based issues should initiate a core change, not just the termination of a general employee who had controlled access to the key or keyway” has been addressed by the new text in section C.3.c.(16)iii.</p> <p>The NRC staff disagrees with the comment regarding the proposed action to change lock system elements in a required rolling 5-day period. The comment of “[i]n addition, termination of an employee for trustworthiness or integrity locks should be changed or cores replaced and an inventory conducted as soon set for the master key within a rolling 5 day period” has been addressed by section C.3.c.(16)iii., which sets the time frame for such actions to be completed “...as soon as possible.” There is no requirement to implement a time period of 5 days to change lock system elements within the Part 73 regulations.</p>

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7-D. Kline	Control of Locks, Keys, Key Cards, Combinations, and Related Equipment (general)	<p>Slight word change to focus the intent of the paragraph.</p> <p>(Change to) Licensees should develop, implement, and maintain a formal process for distributing locks, keys, key cards, combinations, and related equipment to only authorized personnel; accounting for spare components; and changing keys, key card processing systems, and combinations when an individual's authorization for access has been revoked or suspended under certain conditions.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment.</p> <p>The last paragraph has been modified in Section B., titled "Discussion," within subsection with title "Control of Locks, Keys, Key Cards, Combinations, and Related Equipment." to: "In order to implement such control measures, licensees should develop, implement, and maintain a formal process for distributing locks, keys, key cards, combinations, and related equipment to only authorized personnel. Furthermore, when an individual's authorization for access has been revoked or suspended or has left employment duty, under less than favorable conditions, licensees should reduce security risk by: accounting for spare lock components, changing keys, denying function of specific access cards to key card processing systems, and changing combinations on certain lock systems."</p> <p>The NRC staff disagrees with the comment regarding the use of the term "certain conditions" as the event that initiates the change of lock system elements. See the NRC response to comment 5- D. Kline.</p> <p>The NRC staff agrees with the comment regarding the concept of developing a process for the distribution and changing of lock system elements.</p>
8-D. Kline	Section C. Staff Regulatory Guidance, Section 2. "Selection and use of locks to	<p>This is inaccurate. The quoted definition of Security Storage Container in the DG is not consistent with 10CFR73.2</p>	<p>The NRC staff agrees with the comment. The guide was revised to accurately reflect the definition as stated in 10 CFR 73.2 for a <i>Security Storage Container</i>.</p> <p>The definition of <i>Security Storage Container</i> from § 73.2 includes: "any of the following repositories: (1) For storage in a building located within a protected or controlled access area, a steel filing cabinet equipped with a steel locking bar</p>

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	protect SGI., paragraph 2;		<p>and a three position, changeable combination, GSA approved padlock; (2) A security filing cabinet that bears a Test Certification Label on the side of the locking drawer, or interior plate, and is marked, General Services Administration Approved Security Container on the exterior of the top drawer or door; (3) A bank safe-deposit box; and (4) Other repositories which in the judgement of the NRC, would provide comparable physical protection” This complete definition has been added to Section C.2. and the glossary in the document.</p> <p>The following text was removed: “include steel filing cabinets equipped with a steel locking bar and a three position, changeable combination, GSA-approved padlock and security filing cabinets that bears a Test Certification label on the side of the locking drawer, or interior plate, and is marked, “General Services Administration Approved Security Container” on the exterior of the top drawer or door.”</p>
9-D. Kline	Section C. Staff Regulatory Guidance, Section 2. “Selection and use of locks to protect SGI., paragraph 3a;	<p>The section does not permit approvals from the NRC for “other repositories which in the judgement of the NRC, would provide comparable physical protection.”</p> <p>Specifically, the NRC in the past has approved Vault-type Rooms.</p>	<p>The NRC staff agrees with the comment. Text was revised.</p> <p>First, in section C.2. there is no paragraph 3.a. Second, in section C.2.a., it is stated: “Combination locks installed in doors in, or leading to, areas containing SGI should meet FF-L-2740 (if in vault doors) or should be pedestrian door deadbolts meeting FF-L-2890 (for doors to vault-type rooms)” therefore, the vault-type rooms for the protection of safeguards information is discussed as a potentially acceptable means for security storage. In addition, text is added to present that other storage containers may be submitted for NRC review and approval: “Therefore, besides utilizing a defined Security Storage Container for the storage of SGI, other proposed storage containers may be submitted to the NRC for approval.”</p>
10-D. Kline	Section C. Staff Regulatory	Implies the doors to the room with SGI in a locked approved container need to be protected in this manner.	The NRC staff agrees with the comment. Text was revised as follows:

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	Guidance, Section 2. Sub Sect A:	Clarify that this only applies if the SGI is not locked in an approved cabinet or file.	“Combination locks installed in doors in, or leading to, areas containing SGI (i.e., in open storage) should meet FF-L-2740 (if in vault doors) or should be pedestrian door deadbolts meeting FF-L-2890 (for doors to vault-type rooms).”
11-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect A:	<p>Appears to mean we must backfit all of our egress doors with this specified level of locks to the most modern standards?</p> <p>Allow for the site's committed standards or building code to suffice.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment. Revision to the text was made.</p> <p>The staff does not agree that the guide requires existing egress door locks to be changed. The text in the guide, under “Purpose of Regulatory Guides,” states that “Regulatory guides are not substitutes for regulations and compliance with them is not required.” The guidance describes the applicable and pertinent National Fire Protection Association’s standard titled, “NFPA 101: Life Safety Code ®,” sections to aid the reader in understanding the recommended emergency egress lock system features. <i>See</i> Section C.3.a.</p> <p>The staff agrees that applicable building codes should be met. The text revision includes discussion of building codes. The revised paragraph states: “a. Unimpeded emergency egress should be ensured from all parts of the facility, and the security hardware and systems should be designed and installed so as to not degrade life safety. Security hardware and systems should conform to applicable (state and local) fire regulations and building codes...”</p>
12-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect B, “keys not returned paragraph:	<p>Reference to a key not returned or lost may constitute a reportable event under appendix G. Cat III plants do not have to report under this criteria.</p> <p>Again clarification and applicability needs to be Transparent.</p>	<p>The NRC staff disagrees with the comment. No modification to the text was undertaken.</p> <p>Category III special nuclear material (i.e., special nuclear material of low strategic significance) is required to have a controlled access area per 10 CFR 73.67(f)(1) and that area may be secured with a lock/key system. A key not returned or lost may, for a lock/key system that grants or denies access to a controlled access area, warrant generating a reportable event under 10 CFR 73, App. G, Section I., “Reportable Safeguards Events, Pursuant to the provisions of 10 CFR 73.71 (b) and (c), licensees subject to the provisions of 10</p>

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			CFR 73.20, 73.37, 73.50, 73.55, 73.60, and 73.67 shall report or record, as appropriate, the following safeguards event. ... (c) Any failure, degradation, or the discovered vulnerability in a safeguard system that could allow unauthorized or undetected access to a protected area, material access area, controlled access area, vital area, or transport for which compensatory measures have not been employed.”
13-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect B, Regulations in 10 CFR 73.46...” paragraph	Upon termination of employment of any employee, keys locks, combinations, and related equipment to which that employee had access shall be changed. Regulations in 10 CFR Parts 73.46, “Fixed Site Physical Protection Systems, Subsystems, Components, And Procedures,” and 73.50(c)(7) require licensees to control all keys, locks, combinations and related equipment used to control access to protected, material access, vital, and controlled access areas to reduce the probability of compromise. Please validate that this requirement is not applicable to a CAA at a Category III fuel fabrication facility.	The NRC staff disagrees with the comment. No modification to the text was undertaken. The requirements located at 10 CFR 73.46 and 10 CFR 73.50(c)(7) are not applicable to a controlled access area (CAA) at a Category III fuel fabrication facility. These requirements are explicitly only applicable to a licensee who has a formula quantity of special nuclear material.
14-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect B, (4):	(4) Locks on GSA approved containers for arms and ammunition and armory vault doors should meet Federal Specification FF L 2937 or UL 768, Group 1. The requirements of FF L 2937 include the requirements of UL 768, Group 1. Locks that meet FF L 2740 should not be used to protect weapons or ammunition in storage. If this applies to an SNM Facility, it should be separated and noted.	The NRC staff disagrees with the comment. No modification to the the text was undertaken. The title of the subheading for paragraph 3.b. states “The following guidelines are acceptable for the selection and use of locks in the protection of facilities and SNM.” Therefore, the guide needs no modification to address this comment.
15-D. Kline	Section C. Staff Regulatory	(8) Locks used in the protection of Categories I and II SNM (e.g., security containers, safes, vaults) should meet Federal Specification FF L	The NRC staff disagrees with the comment. No modification to the text was undertaken.

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	Guidance, Section 3. Sub Sect B, (8):	<p>2740, "Locks, Combination." This is applicable to locks purchased or installed after the date July, 14, 1994, and for replacement of damaged equipment (Locks meeting FF L 2890 also meet FF L 2740).</p> <p>Safes and vaults currently conform to the proposed guidance, however some lockable storage racks do not conform to the guidance. These racks cannot be retrofitted with locks that meet Federal Specifications FF-L-2740.</p>	<p>The NRC staff disagree with the comment because the text cited from the guide is not a requirement. In Section B, under subsection titled "Purpose of Regulatory Guides," the guide states that "[r]egulatory guides are not substitutes for regulations and compliance with them is not required. Methods and solutions that differ from those set forth in RGs will be deemed acceptable if they provide a basis for the findings required for the issuance or continuance of a permit or license by the Commission."</p> <p>Therefore, the guidance does not impose a requirement, rather it states that locks used in the protection of Cat I and II SNM "...should meet FF-L-2740..." therefore, an alternate method may be exercised if special circumstances exist. These special circumstances may be identified, accompanied with the reasons for the alternative approaches, in a licensee's security plan or procedures.</p>
16-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect B, (12):	<p>(12) For general purposes (no special requirements such as SGI, NSI, RD or SNM), emergency egress locks should comply with ANSI/BHMA A156.2 2003, "American National Standard for Exit Devices," (Ref. 28).</p> <p>Why specify this when local building code should suffice.</p> <p>Allow local jurisdictions to apply.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment.</p> <p>The NRC staff agree that local jurisdictional codes and standards are sufficient and should be complied with.</p> <p>The NRC staff disagrees with the implication to remove the recommendation to use the emergency egress locks described. This is because the cited standards for emergency egress locks will aid those applicants and licensees who seek to implement the optimal type of such locks.</p> <p>Text from section C.3.a. states, "Security hardware and systems should conform to applicable (state and local) fire regulations and building codes." Therefore, as stated in the guide, local jurisdictions do apply. However, the NRC staff perceives this referenced standard as an optimum choice for egress lock systems under these specific conditions. Note that the text in the guide, under "Purpose of Regulatory</p>

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			Guides,” states that "Regulatory guides are not substitutes for regulations and compliance with them is not required.”
17-D. Kline	C. Staff Regulatory Guidance, Section 3. Sub Sect C	<p>“where appropriate” has no definition or reference to aid in the determination of the use of this expectation. Provide regulatory reference to aid in the understanding of this section.</p>	<p>The NRC staff agrees with the comment.</p> <p>In this context, the terminology “where appropriate” is intended to mean when required by regulation. The following text was added to the heading of section C.3.c. “For the protection of: 1) special nuclear material of a formula quantity, moderate strategic significance or low strategic significance, 2) a nuclear power plant, 3) classified matter/information or safeguards information, 4) spent fuel, 5) high level waste, or 6) quantities of radioactive material that fall under the jurisdiction of 10 CFR Part 37, a lock and key control system should be established.”</p> <p>The existing text of “The lock and key control system should include the following elements, where appropriate:” was retained. The terms “where appropriate” is suitable for use in this revised heading's text because, for example, a security plan is not required for special nuclear material of low strategic significance when certain types and quantities of that material are described in an NRC license. Subsequently, under those conditions C. 3.c.(7) “Keys, key codes, key cards, and written combinations should not be removed from the site, except when specifically approved by the security plan” would not be an element within such a licensee’s lock and key control system.</p>
18-D. Kline	C. Staff Regulatory Guidance, Section 3. Sub Sect C, (2)	<p>Takes the records of keys and locks and by implication makes them comparable to SGI at least for the purpose of their protection.</p> <p>Clarify that these records do not constitute SGI and then make a common sense statement on the need and level of protection required.</p>	<p>The NRC staff agrees in part and disagrees in part with the comment.</p> <p>The NRC staff disagrees with the comment because the text cited from the guide, which is under the portion of the guidance document that discusses administrative controls, does not identify these records, for example, to be as sensitive as the information being protected by the locks described in such a record. As the cited recommendation is written: “(2) A record of all</p>

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			<p>locks, cores, keys, and cards should be maintained and kept in a location secured by a combination lock. These records should be protected to the same degree or greater than the protection provided to the information, SNM, classified matter, or facility records being protected by the locks. This lock and key control record should identify the number of keys for each lock and their location and should note when a lock was changed, rekeyed, or rotated.” This entry in the guide does not describe the information (i.e., records) as SGI. It does state that the protection of the lock and key control system records should be at least commensurate with what that system is protecting. For example, a classified information protection scheme for Secret-National Security Information should keep these records (if printed on paper) physically under a cover sheet labeled SECRET, with the back page marked top and bottom with SECRET, and in a <i>Security Storage Container</i> or area, that is fitted with the corresponding lock.</p> <p>The NRC staff does agree, however, that the heading to Section 3, that initially read, “Selection and Use of Locks and/or a Lock and Key Control System to Protect Facilities/SNM under Part 73, Radioactive Materials, Spent Nuclear Fuel, High Level Waste, SGI, NSI, FRD, and RD” could be clarified to ensure licensees understand that the Administrative Controls discussion is separate. The heading has been revised to read, “Selection and Use of Locks and/or a Lock and Key Control System to Protect Facilities/SNM under Part 73 (Radioactive Materials, Spent Nuclear Fuel, High Level Waste, SGI, NSI, FRD, and RD), and Administrative controls.”</p>
19-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect C, (3)	<p>Additional administrative burden. No definition to “other pertinent information”, up to an inspector to determine?</p> <p>Needs clarification and definition for both the licensee and inspector.</p>	The NRC staff agrees with the comment. The text “...and other pertinent information” has been removed. In addition, text was added to clarify types of information to be included in a log for keys and key cards.

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			The entry for Section C, subsection c.(3), now reads: “A log of keys and key cards should be maintained that includes: (1) key identification, (2) user, and (3) times/dates issued and returned.”
20-D. Kline	Section C. Staff Regulatory Guidance, Section 3. Sub Sect C, (4):	“protected adequately” Needs clarification.	The NRC staff agrees with the comment. Text was revised. The text as originally written stated: “(4) Keys, combinations, and key cards not in use should be protected adequately from theft, alteration, and measuring or reading.” To add an explanatory phrase the following was added: “For example keys, combinations and key cards not in actual use should remain in an individual’s possession at all times and not left unattended. In addition, keys, combinations, and key cards not in use could be protected in a <i>Security Storage Container</i> outfitted with the corresponding lock and under the correct lock/key control system measures.”
21-D. Kline	C. Staff Regulatory Guidance, Section 3. Sub Sect C, (9):	What keys are referenced? Those for protecting barriers, sources, or other SGI/SNM locks as necessary? Needs clarification.	The NRC staff agrees with the comment. Modification to the text was undertaken. The commenter is questioning the phrase “(8) Keys should be issued daily, as required, and should be returned immediately thereafter or at the end of the duty shift.” The section (i.e., C.3.c.(8)) refers to recommendations for conditions when a “lock and key control system” is utilized. To clarify the applicability, the Section C.3. title is revised to “Selection and Use of Locks and/or a Lock and Key Control System to Protect Facilities/SNM under Part 73, Radioactive Materials, Spent Nuclear Fuel, High Level Waste, SGI, NSI, FRD, and RD.”
22-D. Kline	C. Staff Regulatory Guidance, Section 3. Sub Sect , F,(6)ii:	ii. Keys, key cards, key codes, combinations, and related equipment to which an employee had access should be changed upon termination or suspension of an employee’s access authorization for any reason, including transfer.	The NRC staff agrees with the comment. See the "NRC Resolution" to comment column, for comment numbers 5 and 6, from D. Kline.

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		<p>However, a licensee need not replace the affected locks.</p> <p>The addition of the terminology “suspension” and “for any reason” would require additional key change without adding value. Suggest utilizing the language found on 10 CFR73.55(g)(6)(i)(D) and in the proposed rule language of 73.46 rulemaking which states access control devices are to be changed whenever “a person with access to control devices has been terminated under less than favorable conditions”.</p>	
23-D. Kline	C. Staff Regulatory Guidance, Section 3. Sub Sect , F,(6)iii:	<p>The guide states “iii. Locks should be immediately changed—or cores replaced and an inventory conducted—whenever a core, key, or card is lost or missing; the lock, core, key, or card has been compromised; or unrecorded keys or cards are found. In a mastered system, a complete remastering of the system should be conducted whenever a core, card, master or control key, or a lock is lost or compromised.” The word “Immediately” is open to interpretation.</p> <p>Comment as proposed text “Locks should be changed—or cores replaced and an inventory conducted—whenever a core, key or card is lost or missing; the lock, core, key, or card has been compromised; or unrecorded keys or cards are found as described in Licensee’s Procedures.”</p>	<p>The NRC staff agrees in part and disagrees in part with the comment. The proposed text is accepted with modification.</p> <p>The NRC staff agrees that the term “immediately” is open to interpretation.</p> <p>The term “immediately” has been substituted with the phrase “as soon as possible.” Therefore, to retain the emphasis on expedient action, the text is altered as follows:</p> <p>“iii. If a core, key, or card is lost or missing; the lock, core, key, or card has been compromised; or unrecorded keys or cards are found, then locks should be changed or cores replaced and an inventory conducted as soon as possible. In a lock system that is master-keyed, a complete remastering of the system should be conducted whenever a core, card, master, control key, or a lock is lost or compromised.”</p> <p>The NRC staff disagrees with recommending that changes to lock system elements be initiated as described in “Licensee’s Procedures.” This is because this phrase does not describe the exigency of changing the lock system elements.</p>

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24-D. Kline	D. IMPLEMENTATION	<p>This section which perhaps should be labeled “applicability” appears to exclude Cat III FCF’s which only contain SNM of low strategic significance. If this is true then the entire Reg. Guide would not apply. This is in conflict or at least confusion with regard to all the aspects of the reg. guide that describe the protection of SGI.</p> <p>Suggest moving this section up front. Then a clear scope of applicability statement including the regulation basis for the applicability.</p>	<p>The NRC staff agrees with the comment in part.</p> <p>The NRC staff agrees that the guide should be explicitly described as applicable to the protection of special nuclear material of low strategic significance. Text was revised in Section A of the guide.</p> <p>The listing in Section A, titled “Applicable Regulations” provides the applicable regulations and licensee types. The listing has been revised to include 10 CFR 73.67 “Licensee Fixed Site and In-Transit Requirements for the Physical Protection of Special Nuclear Material of Moderate and Low Strategic Significance.”</p> <p>The NRC staff disagrees that the Section titled “IMPLEMENTATION” should be moved to the beginning of the guide. The implementation section discusses how to implement the guidance and is in the standard format for this type of information in an NRC RG, and therefore will not be moved or retitled.</p>
1-T. Zibell	Page 3, B.1.	<p>In addition, the guide contains updated references and relevant regulations were where identified.</p>	<p>The NRC staff agrees with the comment.</p> <p>The section has been modified as follows:</p> <p>“... In addition, the revised guide cites updated references and describes relevant regulations, where appropriate.”</p>
2-T. Zibell	Page 5, para 1	<p>Original sentences: “Removing the back cover from the lock may allow the combination to be determined. The combinations of some key change locks can be changed directly when the lock is in the open position, while others must have the existing combination reentered to a different index when the access is in the open position to permit the combination change. The former type permits an intruder to quickly change the combination to one of his or her own choosing. This would allow an intruder entrance</p>	<p>The NRC agrees with the comment with modification.</p> <p>The NRC staff agrees that the proposed phrase is accurate and should be included in the paragraph of interest. The NRC staff disagrees with replacing the three sentences with only the proposed one. The explanation of what access to the back of a lock may present under certain circumstances is discussed in sentences two and three, and if replaced by the proposed sentence, that information would not be provided. Therefore, the paragraph has been modified with additional clarity as follows:</p>

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		<p>after the lock is closed, but deny entry to an authorized user.”</p> <p>Replace sentences two, three and four with “If the combination of a lock is changed by an intruder, that person would have access, but an authorized user would not.”</p>	<p>“Combination locks may be susceptible to compromise if the back of the lock is readily available (examples are: when the back of the lock is accessible or the lockable access is open). Removing the back cover from the lock may allow the combination to be determined. The combinations of some key-change locks can be changed directly when the lock is in the open position, while others must have the existing combination re-entered when the access is in the open position to permit the combination change. The former type permits an intruder to quickly change the combination to one of his or her own choosing. If the combination of a lock is changed by an intruder, that person would have access, but an authorized user would not. For these reasons, backplates or other devices should be used to protect the back of the lock, and the door or container in which the lock is located should not be left unattended when open.”</p>
3-T. Zibell	Page 5, para 2	<p>The combinations of some key-change locks can be changed directly when the lock is in the open position, while others must have the existing combination reentered to a different index when the access is in the open position to permit the combination change. Reason: It isn't always to a different index; this detail isn't helpful to most readers</p>	<p>The NRC staff agrees with the comment. The sentence has been replaced with:</p> <p>“The combinations of some key-change locks can be changed directly when the lock is in the open position, while others must have the existing combination re-entered when the access is in the open position to permit the combination change.”</p>
4-T. Zibell	Page 5, para 4	<p>First sentence: replace “(Ref. 11)” with “(Ref. 12)” Reason: Ref. 12 is correct</p>	<p>The NRC staff agrees with the comment. The reference number is modified.</p>
5-T. Zibell	Page 5, para 4	<p>Replace second and third sentences with: “To be approved by the General Services Administration (GSA), security containers and security vault doors and doors for facilities approved for open storage of classified information must be secured with a lock approved under Federal Specification FF-L-2740. The only exception is for field safes, safes</p>	<p>The NRC agrees in part and disagrees in part with the comment.</p> <p>The NRC staff agrees with the concept of the proposed text and the reference number change. The NRC disagrees that the recommendation should be expressed in the exact manner as proposed, because the NRC regulations do not state the use of these lock systems as a requirements. Consequently, the</p>

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		<p>specifically designed and built for protection of classified material under field conditions. These may use a lock meeting Underwriters Laboratories Inc. (UL) Standard 768, “Combination Locks,” (Ref. 13), Group 1 or 1 R. Currently, field safes are manufactured with locks meeting Federal Specification FF-L-2937.”</p> <p>Reason: Original had errors and was awkwardly written; Ref. 13 is correct.</p>	<p>“must” term is replaced with “should.” In addition, the paragraph is reworded for better clarity. The paragraph is modified as follows: “To be approved by the U.S. General Services Administration (GSA), security file cabinets, map and plan containers, vault doors, and doors for facilities approved for open storage of classified information must be secured with a lock that has been tested and approved under FF-L-2740. The only exception is for field safes (safes specifically designed and built for the protection and storage of classified material in other than fixed facilities), which should use a lock meeting the standards in Underwriters Laboratories (UL) 768, “Standard for Combination Locks” (Ref. 13) or locks meeting Federal Specification FF-L-2937, “Combination Lock, Mechanical” (Ref. 14). Locks meeting FF-L-2740 should not be used on field safes..”</p>
6-T. Zibell	Page 5, para 5	<p>Replace second, third, and fourth sentences with:</p> <p>“Six locks have been approved under Federal Specification FF-L-2740: Mas- Hamilton Group models X-07 and X-08, Kaba Mas models X-09 and X-10, and Sargent and Greenleaf models 2740 and 2740B. All six models are electromechanical locks; the X-07, X-08, X-09, and X-10 are generator-powered, and the 2740 and 2740B are battery-powered. While all six models are approved, only the X-10 and 2740B are currently being produced.”</p> <p>Reason: Original had errors and was not current.</p>	<p>The NRC staff agrees with the comment. The sentences have been replaced with the text as indicated below:</p> <p>“Six locks have been approved under FF-L-2740: Mas-Hamilton Group models X-07 and X-08; Kaba Mas models X-09 and X-10; and Sargent and Greenleaf models 2740 and 2740B. All six models are electromechanical locks, the X-07, X-08, X-09, and X-10 are generator-powered, and the 2740 and 2740B are battery-powered. While all six models are approved, only the X-10 and 2740B are currently being produced.”</p>
7-T. Zibell	Figure 2	<p>Add photo of lock case.</p> <p>Reason: There is more to the lock than the dial and dial ring.</p>	<p>The NRC staff agrees with the comment.</p> <p>The internal schematic had not been provided by the manufacturer and therefore was not included. Kaba Mas provided permission to use an image of the X-10 from their website. The image is included for Figure 2, and the</p>

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			corresponding caption has been updated to “Figure 2. X-10 Lock”
8-T. Zibell	Page 6, para 1	First sentence: Replace “(Ref. 13)” with “(Ref. 14)” Reason: Ref. 14 is correct.	The NRC staff agrees with the comment. The reference number has been corrected.
9-T. Zibell	Page 6, para 1	Change: Pedestrian door locks meeting the requirements of Federal Specification FF-L-2890 that feature single-motion egress for life safety is are available and applicable for protection of facilities approved for open storage of classified information. Reason: Plural subject and verb	The NRC staff agrees with the comment. The sentence has been replaced with the following text: “Pedestrian door locks meeting the requirements of FF-L-2890 that feature single-motion egress for life safety are available and applicable for protection of facilities approved for open storage of classified information.”
10-T. Zibell	Page 6, para 1	Replace: In last sentence “mated” with “integrated.” Reason: correct word	The NRC staff agrees with the comment. The last sentence has been changed from “mated” to the proposed term “integrated.”
11-T. Zibell	Page 6, para 2	Replace second sentence with: “Since April 20, 2007, all GSA-approved weapons containers and armory vault doors have been manufactured with a lock that meets Federal Specification FF-L-2937, “Combination Lock, Mechanical” (Ref. 15).” Reason: Correct information	The NRC staff agrees with the comment. The text has been adjusted. The entry, within the Section B., subsection titled “Combination Locks,” now reads “Locks on GSA-approved containers and vault doors for securing arms, ammunition, and explosives should meet additional federal specifications. According to the U.S. Department of Defense Lock Program, mechanical combination locks should meet the latest revisions to the federal specifications listed below: <ul style="list-style-type: none"> • FF-L-2937, “Combination Locks, Mechanical,” (Ref. 16) • UL 768, Group 1, “Standard for Combination Locks” Note that Section C.3b.(3) states “... The requirements of FF-L-2937 include the requirements of UL 768, Group 1”

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12-T. Zibell	Page 6, para 3	Delete entire paragraph. Reason: Repeats previous paragraph.	The NRC staff agrees with the comment. The sentence has been removed. Paragraph which stated: "Federal Specification FF-L-2937 is a relatively new specification. The requirements of Federal Specification FF-L-2937 correspond to the requirements of UL 768, Group 1. GSA-approved weapons containers and armory vault doors will use locks approved under Federal Specification FF-L-2937 effective March 1, 2008," is removed.
13-T. Zibell	Page 6, para 4	Replace: "(Ref. 15)" with "(Ref. 16)" and "(Ref. 16)" with (Ref. 17)" Reason: Correct references.	The NRC staff agrees with the comment. The references have been corrected.
14-T. Zibell	Page 7, para 1	Replace: "A156.5-2001" with "A1 56.5-2014" Reason: Current edition.	The NRC staff agrees with the comment. The version of the lock has been updated as described. Three instances of "A156.5-2001" were noted in the document (third reference was from the references section, Ref. 18). All have been modified, and citation has been updated to reflect current number and title. According to http://www.buildershardware.com/bhma-standards/ansibhma-a1565-cylinders-and-input-devices-locks , the proper format of the citation is: "A156.5 Cylinders and Input Devices for Locks," published on January 24, 2014.
15-T. Zibell	Page 7, para 1	Replace: "(Ref. 17)" with "(Ref. 18)". Reason: Ref. 18 is correct.	The NRC staff agrees with the comment. The reference has been corrected.
16-T. Zibell	Page 7, para 3	Delete: Second sentence. Reason: Has no relevance to anything in the paragraph	The NRC staff agrees with the comment. The sentence has been removed.
17-T. Zibell	Page 7, para 3	Replace: Sentences three thru six with: "A six-pin cylinder with ten depths per pin theoretically provides one million different keys. Beyond basic pin-tumbler cylinders, several high-security lock cylinders are available. These	The NRC staff agrees with the comment. The three sentences have been modified as: "A six-pin cylinder with ten depths per pin theoretically provides 1 million different keys. Beyond basic pin-tumbler

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		can provide considerably increased resistance to covert and surreptitious attack, as well as increased key control.” Reason: Original had errors and was awkward.	cylinders, several high-security lock cylinders are available. These can provide considerably increased resistance to covert and surreptitious attack, as well as increased key control.”
18-T. Zibell	Page 7, para 4	Replace: Second sentence with: “Master keying is the controlled loss of security, and so must be done correctly.” Reason: Clarity	The NRC agrees with the comment. The text has been modified as follows: “Master keying should be done correctly to minimize the loss of security associated with such a system.”
19-T. Zibell	Page 7, para 4	Replace: Sentence six with: “Furthermore, where locks are not routinely monitored (e.g., a padlock on a gate at a remote site), the lock should not be master keyed and the control key should be unique to that padlock.” Reason: Correct information for any remote padlock.	The NRC staff agrees with the comment. The original sentence has been replaced with the following revised sentence: “Furthermore, where locks are not routinely monitored (e.g., a padlock on a gate at a remote site), the lock should not be master keyed and the control key should be unique to that padlock.”
20-T. Zibell	Page 7, para 5	Replace: Sentence one with: “Master keying is undesirable from a security point of view because any cylinder may be reverse-engineered to reveal the top master key.” Reason: Clarity	The NRC staff agrees with the comment. The original sentence has been replaced with the following revised sentence: “Master keying is undesirable from a security perspective because any cylinder may be reverse-engineered to reveal the top master key.”
21-T. Zibell	Page 7, para 5	Replace: Sentence three and four with: “In addition, any compromise of a master key compromises that entire master key system. Rekeying all the effected locks is costly, but the convenience of master key systems is such that there is strong pressure to use them.” Reason: Clarity.	The NRC staff agrees with the comment. The paragraph has been edited for better information flow. “Master keying should be done correctly to minimize the loss of security associated with such a system. Master keying is undesirable from a security perspective because any cylinder may be reverse-engineered to reveal the top master key. In addition, any compromise of a master key (e.g., termination of an employee who had access to a master key) compromises that entire master key system. Rekeying all the

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			effected locks is costly, but because of the convenience of master key systems there is strong desire to use them. A graded approach to this conflict, between convenience and security, could be to: (1) utilize a set of locks that has not been master-keyed for protected areas, material access areas, vital areas, and areas containing NSI, RD, FRD or SGI; and (2) use master-keyed lock sets for other, less sensitive areas. Master keying is prohibited for the protection of classified information or matter per 10 CFR 95.25(j)(8).”
22-T. Zibell	Page 7, paragraph 6	Replace: Sentence one with: “It is essential for the bolt of a lock to be retained in the locked position by positive means, so that end pressure on the bolt will not retract it.” Reason: Clarifies statement.	The NRC staff agrees with the comment. The original sentence “It is essential for a bolt of a lock to be retained in the locked position by positive means (i.e., it should not be possible to move the bolt without opening the lock) (dead bolt)” has been replaced with the suggested sentence.
23-T. Zibell	Page 8, paragraph 1	Replace: Last sentence “(Ref. 19)” with “(Ref. 20).” Reason: Ref 20 is correct.	The NRC staff agrees with the comment. The reference has been corrected.
24-T. Zibell	Page 8, paragraph 1	Replace: Sentence two “(Ref. 20)” with “(Ref. 21).” Reason: Ref 22 is correct.	The NRC staff agrees with the comment. The reference has been corrected.
25-T. Zibell	Page 8, paragraph 2	Replace: Sentence one “(Ref. 21)” with “(Ref. 22).” Reason: Ref 22 is correct.	The NRC staff agrees with the comment. The reference has been corrected.
26-T. Zibell	Page 8, paragraph 2	Replace: Sentence one “(Ref.21)” with “(Ref. 22).” Reason: Ref 22 is correct.	(Redundant to immediately previous comment.)
27-T. Zibell	Page 8, paragraph 3	Replace: Sentence one “(Ref.23)” with “(Ref. 24).” Reason: Ref 24 is correct.	The NRC staff agrees with the comment. (However, this comment applies to paragraph 4.) The reference has been corrected.
28-T. Zibell	Page 8, paragraph 5	Replace: in sentence three: “The Navy designed ILD” with “The ILD.” Reason: Redundant, first sentence already says the Navy designed it.	The NRC staff agrees with the comment. Sentence has been modified to: “The ILD, in addition to possessing increased resistance to forced entry, is resistant to surreptitious neutralization

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			attempts by picking, shimming, impressioning, and bypassing methods.”
29-T. Zibell	Page 9, paragraph 1	Replace: Fifth sentence: “facilities “with “facilitates.” Reason: Correct word.	The NRC staff agrees with the comment. The sentence has been modified.
30-T. Zibell	Page 9, paragraph 3	Replace: Sentence three, “It is released” with “The electric strike is released.” Reason: Clarity.	The NRC staff agrees with the comment. The sentence has been modified.
31-T. Zibell	Page 10, paragraph 2	Replace: “(Ref. 24)” with “(Ref. 25)” and “(Ref. 25)” with “(Ref. 26)” Reason: Correct references.	The NRC staff agrees with the comment. The references 24, 25, and 26 were modified to the correct references.
32-T. Zibell	Page 10, paragraph 5	Replace: “(Ref. 26)” with “(Ref. 27)” Reason: Ref. 27 is correct.	The NRC staff agrees with the comment. The references were corrected.
33-T. Zibell	Page 11, paragraph 1&2	Replace: Paragraph one and two with: “For protection of classified information that is NOT subject to the Atomic Energy Act, replace 10 CFR 95 with information from 32 CFR 2001, effective 6/25/10, which applies to the NRC. See especially 2001.42 (a), Storage, and 2001.43, Storage.	<p>The NRC staff agrees in part and disagrees in part with the comment.</p> <p>The NRC staff disagrees with replacing the NRC requirements cited in the guide with the proposed text. Note that the NRC regulations legally apply to the NRC activities and therefore citing applicable NRC regulations for the protection of classified information must remain.</p> <p>The NRC staff agrees that the 32 CFR 2001 has the most up-to-date federal requirements for the protection of classified information. To address the comment, the text has been modified to include “Locks may need to meet various federal specifications. In particular, 32 CFR 2001, (see Ref. 17) contains the most recent federal requirements to secure Secret and Confidential NSI, RD and FRD.”</p>
34-T. Zibell	Page 12, paragraph 9	Replace: “(Ref. 27)” with “(Ref. 28)” Reason: Ref. 28 is correct.	The NRC staff agrees with the comment. The reference has been corrected.
35-T. Zibell	Page 14, paragraph 5	Replace: “(Ref. 28)” with “(Ref. 29)” Reason: Ref. 29 is correct.	The NRC staff agrees with the comment. The reference has been corrected.

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36-T. Zibell	Page 19, paragraph 4	Replace: “(Ref. 30)” with “(Ref. 31)” Reason: Ref.31 is correct.	The NRC staff agrees with the comment. The reference has been corrected.
37-T. Zibell	Page 22, paragraph 1	Replace:--“UL... Underwriters Laboratories, Inc. This for-profit [non-profit] national testing laboratory...” Reason: They have been a for-profit lab since 2012.	The NRC staff agrees with the comment. Definition has been updated to read: “This for-profit national testing laboratory tests and lists or labels various categories of equipment for safety and reliability. It also publishes standards for a wide range of products, including security products.”
38-T. Zibell	Page 23	References FOR ALL FEDERAL AND MILITARY SPECIFICATIONS: Refer to the “most current revision,” which includes amendments (if applicable). Refer to the DoD Lock Program website, http://www.navfac.navy.mil/o/locks , “Documents.” FOR STANDARDS BY UNDERWRITERS LABORATORIES INC. and BUILDERS HARDWARE MANUFACTURERS ASSOCIATION: Refer to the “most current revision.” FOR STANDARDS BY THE AMERICAN SOCIETY FOR TESTING AND MATERIALS: Refer to the “most current revision.” FOR STANDARDS BY THE NATIONAL FIRE PROTECTION ASSOCIATION: Refer to the “most current revision.”	The NRC staff agrees in part and disagrees in part with the comment. The NRC agrees use of the most current revision version for all federal and military specifications is appropriate. The Reference section has been adjusted to reflect the update to federal/military standards. For other standards; the NRC accepts the revisions that are referenced in this RG.
39-T. Zibell	23 Footnote 3	Replace: Existing DoD Lock Program website URL with the URL stated above. Replace: Existing DoD Lock Program email address with _____	The NRC staff agrees with the comment. If DoD lock information is desired to be found, then a reader can use the DoD Lock Program website, to find the information.

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			<p>The originally-cited website address for the DoD lock program has been replaced with the most current address. In order to accommodate a hyperlink in the guide to the DoD lock program, the most current address is now linked electronically in the document on page 28, within footnote 3, to a shorter-in-length edited hyperlink: http://www.navfac.navy.mil/navfac_worldwide/lock_program.</p> <p>The current website address for the DoD lock program is: http://www.navfac.navy.mil/navfac_worldwide/specialty_centers/exwc/products_and_services/capital_improvements/dod_lock.html</p>
40-T. Zibell	Ref 17	Replace: Current text with: “National Archives and Records Administration, Information Security Oversight Office, 32 CFR Parts 2001 and 2003, RIN 3095-AB63, Implementing Directive No. 1, Classified National Security Information, Final Rule, June 25, 2010”	<p>The NRC staff agrees with the comment.</p> <p>The reference has been corrected, and the proposed text has been incorporated with modification. The revised text is: “National Archives and Records Administration, Information Security Oversight Office, 32 CFR Parts 2001 and 2003, RIN 3095-AB63, Implementing Directive No. 1, Classified National Security Information, Final Rule, June 25, 2010.”</p>
1-Thomas Collins	C-1	The current regulation and the Draft Regulatory Guide contradicts what is written in the National Industrial Security Program Operators Manual (NISPOM), DoD 52200.22-M, dated February 28, 2006 Incorporating Change 1, March 28, 2013. The NISPOM 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. NISPOM Section 5-303 states: “SECRET Storage. SECRET material shall be stored in a GSA-approved security container, an approved	<p>The NRC staff agrees with the comment.</p> <p>A third paragraph at the beginning of the section C.1. has been added: “... licensees should consider complying with the National Industrial Security Program Operators Manual (NISPOM), DoD 52200.22-M, dated February 28, 2006, Incorporating Change 2, May 18, 2016, section 5-303, (Ref. 30), which states “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.”</p>

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		<p>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:</p> <p>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.</p> <p>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.</p> <p>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.</p>	
1-M. Welling		<p>The Virginia Radioactive Materials Program (VRMP) has reviewed this draft guidance on “General Use of Locks” and provides the following comments for the NRC’s review:</p> <p>1. The VRPM recommends verbiage be included in Section B, “Discussion” that licensees under the Part 37 regulations are currently in-line with the security requirements and that this guidance</p>	<p>The NRC staff agrees in part and disagrees in part with the comment in part. Text has been modified.</p> <p>Because the statement does not constitute guidance the NRC staff disagrees with inclusion of the text that “... licensees under Part 37 are currently in-line with the security requirements”</p>

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		is to help licensees understand the complexity of locks that can be used.	The NRC staff agrees that licensees authorized to possess an aggregated Category 1 or Category 2 quantity of radioactive material listed in Appendix A to 10 CFR Part 37 can be informed from the guide. Therefore, Section C. 3. is revised to include “For licensees who are licensed to possess radioactive materials under 10 CFR Part 37 and/or 10 CFR Part 20, the guidance does not provide specific means to meet certain requirements, however the information within this RG as described in section C.3. may be useful in the development of a licensee’s approach to meet security requirements.”
2-M. Welling		The VRMP does not understand the following statement made on page 18: “However, voluntarily using the subject matter in the guidance may change a licensee’s plan such that the NRC review may be required under the provisions of 10 CFR 37.43...”. The security plan required under 10 CFR 37.43 should always be part of a license inspection and not just subject to review based upon the licensee using this guidance document on locking devices. The VRMP recommends removing this statement from the guidance.	The NRC staff agrees with the comment. The staff agrees that the reference to 10 CFR 37.43 in this sentence is not appropriate because the NRC does not review and approve the security plans of licensees under 10 CFR Part 37. Therefore, the reference to 10 CFR 37.43 has been removed from the sentence.
3-M. Welling		The VRMP recommends that discussion regarding Part 37 licensees be separated from licensees in Part 50, 70 and 73. The VRMP contends that Part 37 licensees may believe they are required to follow this guidance and/or amend their license to commit to this guidance even though that is not required in the licensing requirements for Part 37.	The NRC staff agrees in part and disagrees in part with the comment. The NRC staff disagrees that the guide expresses recommendations as requirements. The revised RG 5.12 guide states in Section A., subsection titled “Purpose of Regulatory Guides,” , “[r]egulatory guides are not substitutes for regulations and compliance with them is not required.” The NRC staff agrees that the guide should state clearly that licensees authorized to possess an aggregated Category 1 or Category 2 quantity of radioactive material listed in Appendix A to 10 CFR Part 37 can benefit from the use of

Commenter	Section of DG-5027	Specific Comments (All comments are directly quoted)	NRC Resolution
			<p>the guide. The document has been revised in Section C.3.c. to reflect pertinent radioactive material licensees as follows: “For specific examples of how to secure radioactive material through the use of locks, in addition to the appropriate elements discussed in Section C.3. “Selection and Use of Locks and/or a Lock and Key Control System to Protect Facilities/SNM under Part 73, Radioactive Materials, Spent Nuclear Fuel, High Level Waste, SGI, NSI, FRD, and RD,” there is information on how to secure radioactive material through the use of locks in NUREG-2155, Rev. 1, “Implementation Guidance for 10 CFR Part 37, Physical Protection of Category 1 and 2 Quantities of Radioactive Material,” dated January 2015, (Ref. 31) and NUREG-2166, “Physical Security Best Practices for the Protection of Risk-Significant Radioactive Material,” dated May 2014 (Ref. 32).</p>
1-T. Henderson		<p>In response to 80 FR 53, First Energy Nuclear Operating Company (FENOC) has reviewed the draft regulatory guide (RG), and appreciates the opportunity to provide the following comments.</p> <p>The draft RG indicates that only the Federal Specification FF-L-2740 model X-09 lock is currently being produced. Industry information indicates a subsequent Model X-10 is now in production that should be evaluated for inclusion in this regulatory guide.</p>	<p>The NRC staff agrees with the comment.</p> <p>Due to the comment resolution for the Navy’s (i.e., Mr. Zibell) comment that applied to the use of the X-09 and recommendation to cite the X-10, the comment has been addressed.</p> <p>The 7-T. Zibell comment also referenced the need to update this image. Internal schematic has not been provided by the manufacturer and has therefore not been included. Kaba Mas staff provided permission to use an image of the X-10 from their website. An image has been included for Figure 2, and the caption has been updated to state “Figure 2. X-10 Lock.”</p>
2-T. Henderson		<p>Starting on page 5 of the RG, with the reference number for Federal Specification FF-L-2740, reference numbers are incorrect. For example, Federal Specification FF-L-2740 is identified as reference 11, but Federal Specification FF-L-2740A is actually reference 12. Reference 11 is Lock Industry Standards and Training Council, The Professional Locksmith Dictionary, 2006.</p>	<p>The NRC staff agrees with the comment. All references have been resolved to be coordinated with appropriate areas, information, or material to be protected.</p> <p>Due to the comment resolution proposed for the Navy’s (i.e., Mr. Zibell) comments that applied to the reference numbers, the comment has been addressed.</p>

Commenter	Section of DG-5027	Specific Comments (All comments are directly quoted)	NRC Resolution
1- Organization of Agreement States		<p>The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and respectfully submits the following comments for consideration by the NRC.</p> <p>Although there is good general information about locks in this guidance document, all of the specific instruction is for Parts 50 and 73 licensees or licensees with safeguards information. It's unclear what Increased Controls licensees are supposed to take away from this document. The Board recommends adding specific examples for Increased Controls licensees that are not Part 50 or 73 licensees or licensees with safeguards information.</p>	<p>The NRC staff agrees with the comment.</p> <p>This guidance document provides information about locking devices and how they can be used to control and protect areas, materials, facilities and sensitive information. The information in this guidance document can be used by Agreement State licensees under the increased control orders. The document is revised to state that a "...lock and key control system..." is recommended to be utilized in the protection scheme for radioactive materials (see Section C.3.c.). In addition, for specific examples associated with how to secure radioactive material through the use of locks, see NUREG-2155, Rev. 1, <i>Implementation Guidance for 10 CFR Part 37, Physical Protection of Category 1 and 2 Quantities of Radioactive Material</i>, dated January 2015, and NUREG-2166, <i>Physical Security Best Practices for the Protection of Risk-Significant Radioactive Material</i>, dated May 2014. The recommendation to use these NUREGs is expressed in Section C.3.c.</p>
2- Organization of Agreement States		<p>Additionally, the Board recommends the following language be added to the document: "This document is intended as additional voluntary guidance on the security requirements found in Part 37. Licensees need not apply this guidance in order to comply with Part 37."</p>	<p>The NRC staff disagrees with the comment. No modification was made to the text.</p> <p>This document is a guidance document and it does not set regulatory requirements. The document states in Section A under subsection titled</p> <p>"Purpose of Regulatory Guides" that "Regulatory guides are not substitutes for regulations and compliance with them is not required."</p>