

### SUPPLEMENTAL INSPECTION PROGRAM

Effective Date: January 1, 2019

#### 2201-01 OBJECTIVES AND PHILOSOPHY OF SUPPLEMENTAL INSPECTIONS

Supplemental inspections for the security inspection program are designed to support the U.S. Nuclear Regulatory Commission's (NRC's) goals of maintaining safety; enhancing public confidence; improving the effectiveness, efficiency, and realism of the regulatory process; reducing unnecessary regulatory burden; and promoting the common defense and security. While the security baseline inspection program and performance indicators (PIs) should provide sufficient information to allow the NRC to ensure licensees are maintaining safety at facilities, additional supplemental inspections are required as applicable to provide enhanced information regarding the physical security at facilities where significant performance issues have been identified. These performance issues may be identified either through inspections or when PI thresholds are exceeded.

The breadth and depth of the supplemental inspections increase in proportion to the relative significance of the identified performance issues and are based on the guidance provided in the NRC's action matrix in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program."

#### 2201-02 APPLICABILITY

The supplemental inspections listed in IMC 2515, "Light-Water Reactor Inspection Program-Operations Phase," Appendix B, "Supplemental Inspection Program," apply to power reactor licensees and are to be conducted by region-based or headquarter-based inspectors.

#### 2201-03 RESOURCES

The resources needed to conduct supplemental inspections may vary considerably due to the complexity of the issue(s) and the thoroughness of the licensees own evaluations and proposed corrective actions. The Office of Nuclear Security and Incident Response will fund all effort associated with security-related supplemental inspections.

#### 2201-04 DOCUMENTATION

The inspection report written for supplemental inspections should contain the NRC's assessment of each inspection requirement that is included within the scope of the inspection. Inspection documentation is pursuant to IMC 0611, "Power Reactor Inspection Reports." Security information designation guidance will be adhered to for all inspection reports, temporary instructions, orders, etc. that contain or have the potential to contain safeguards or

other sensitive security information. These documents shall be marked and controlled in accordance with Volume 12, "Security," of the NRC's management directives or the agency's guidance on sensitive unclassified non-safeguards information as necessary.

#### 2201-05 SIGNIFICANCE DETERMINATION FOR POWER REACTORS

IMC 2515, Appendix B, "Supplemental Inspection Program," contains the program requirements for power reactors. As discussed in paragraphs 1 and 2 above, the significance of findings at commercial power reactors shall be determined using IMC 0609, Appendix E, "Security Significance Determination Process."

#### 2201-06 DESCRIPTION OF SUPPLEMENTAL INSPECTION PROGRAM

Generally, the supplemental inspection program utilizes three procedures for a deeper and broader independent assessment of licensee actions as the safety or security significance of a performance issue increases. However, if more specificity is needed in a particular program area, this independent assessment can be augmented with procedures selected from tables that list the procedures by cornerstone and key attributes provided in Appendix B to IMC 2515 (Attachment 1, pages 1-5). The list includes baseline inspection procedures of which portions can be repeated with additional samples for a more comprehensive assessment.

Objectives of this independent assessment are to ensure that the licensee has properly identified the scope (extent) of the issues and that the proposed corrective actions are sufficiently comprehensive. Any new issue identified during a supplemental inspection will be evaluated using the applicable significance determination process.

IMC 0305 contains guidance on when to perform each type of supplemental inspection.

The following table is an overview of the supplemental inspection program.

## Supplemental Inspection Overview

Supplemental Inspection Procedure	Scope	Assessment of Inspection Findings
<u>95001</u> One or two white inputs in a strategic performance area; Cornerstone objective met with minimal degradation in security performance.	Increase in NRC oversight of area(s) of concern. Supplemental Inspection Procedure 95001.	Significant weaknesses in the licensee’s evaluation may result in expansion of the inspection to independently acquire the information necessary to satisfy the inspection objectives. The original issue may be “Held “Open” in the Action Matrix until the weaknesses in the evaluation are addressed and corrected.
<u>95002</u> One degraded cornerstone (3 or more white inputs or 1 yellow input), or 3 white inputs in any strategic performance area; Cornerstone objective met with moderate degradation in security performance.	Expanded NRC oversight in area(s) of concern. Sample increased as appropriate. Supplemental Inspection Procedure 95002.	Results of this supplemental inspection will be assessed to determine if additional agency actions are warranted.
<u>95003</u> Repetitive degraded cornerstone, multiple degraded cornerstones, multiple yellow inputs or one red input; Cornerstone objectives met with longstanding issues or significant degradation in security performance.	Reactive team inspection in area(s) of concern. Supplemental Inspection Procedure 95003.	Results of this supplemental inspection will be assessed to determine if additional agency actions are warranted.

### 2201-07 ASSESSING INSPECTION FINDINGS

If during implementation of IP 95001 or IP 95002, significant weaknesses are identified in the licensee’s evaluation of the performance issue, the inspection may be expanded as necessary to independently acquire the information necessary to satisfy the inspection requirements. See additional discussion in IMC 2201, “[Security Inspection Program for Operating Commercial Nuclear Power Reactors](#),” and IMC 2515.

END

Attachment 1: Revision History for IMC 2201, Appendix B

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML040680528 02/19/04 CN 04-007	Initial issuance.	N/A	
N/A	ML081440358 09/08/09 CN 09-021	This document has been revised to remove references to programs other than operating power reactor, and update terminology and format.	N/A	ML091380060
N/A	ML11209B310 11/15/11 CN 11-034	Document revised to provide greater detail concerning the description of the supplemental inspection program, eliminate references from IMC 0320, add references to IMC 0305, and minor edits.	N/A	N/A
N/A	ML13234A514 09/22/15 CN 15-017	This IMC has been revised to reflect minor administrative changes.	N/A	ML15209A592
N/A	ML18031A991 08/20/18 CN 18-026	The revision of this IMC was administrative in nature, the changes applied were to comport with recent changes to the ROP Action Matrix within IMC 0305, "Operating Reactor Assessment Program," that were completed in 2016. During this administrative revision, a complete SUNSI review was conducted in which the staff concluded that this document should be de-controlled. Consistent with the staff's SUNSI determination, this document has been de-controlled and the SUNSI markings have been removed.	N/A	ML18031B114