



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 11, 2018

MEMORANDUM TO: Darryl Parsons, Chief  
Information Security Branch  
Division of Security Operations  
Office of Nuclear Security and Incident Response

FROM: Alicia Williamson, Project Manager */RA/*  
Information Security Branch  
Division of Security Operations  
Office of Nuclear Security and Incident Response

SUBJECT: SUMMARY OF MARCH 12, 2018, PUBLIC MEETING REGARDING  
INSIDER THREAT PROGRAM AND SECURITY EXECUTIVE AGENT  
DIRECTIVE 3 FOR U.S. NUCLEAR REGULATORY  
COMMISSION-LICENSED FACILITIES

On March 12, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff held its second public meeting at the NRC headquarters-Advisory Commission Reactor Safeguards Hearing Room to provide information on the implementation of the National Industrial Security Program Operating Manual (NISPOM) Change 2 Insider Threat Program (ITP) and the Security Executive Agent Directive (SEAD) 3. Approximately 40 people total attended the meeting. Attendees included members of the nuclear industry and NRC staff members from various offices.

The meeting began with a detailed NRC presentation providing an overview of the NISPOM ITP and SEAD 3 requirements. Followed by an explanation of the current minimum requirements for non-possessing and possessing licensees. The staff explained how if licensees modified the Standard Practice Procedures Plan (SPPP) to include ITP in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 95.19(a), implementation of the NISPOM ITP and SEAD 3 would be accomplished. Next the staff provided responses to audience questions received at the February 21 public meeting. The questions and responses are below:

- Could current NEI triennial training be used to fulfill the new requirements for NISPOM ITP or is annual training required?
  - Staff Response: The current NEI triennial training would not cover the new requirements of NISPOM ITP; therefore, annual training would be required.

CONTACT: D. Parsons, NSIR/DSO/ISB  
(301) 415-1878

A. Williamson, NSIR/DSO/ISB  
(301) 415-7751

- Reporting elements under 10 CFR Part 25 and SEAD 3 overlap. Will the regulations be updated to align the two or will there be two reporting columns?
  - Staff Response: At this time, licensees will need to meet the reporting requirements for 10 CFR Part 25 and SEAD 3 separately; however we recognize there is overlap and your reporting may reflect that. The NRC plans to update the appropriate regulations to incorporate these changes in the future; however, no timetable for the update has been determined at this time.
  
- Is implementation of the new NISPOM ITP and SEAD 3 requirements fee billable under an NRC license? If so, how will the NRC bill licensees for the implementation of the new requirements?
  - Staff Response: Yes, the new requirements will incur a small fee. The staff anticipates approximately a 3-5 hour level of effort for NISPOM ITP. This will be a one-time charge/fee. The staff does not anticipate additional charges beyond the annual fees for SEAD 3.
  
- How and when will the NRC staff verify the NISPOM ITP and SEAD 3 requirements have been met and properly incorporated into the SPPP by licensees?
  - Staff Response: The NRC expects licensees would update their SPPPs and submit these changes as required under 10 CFR Part 95.19. The submittal to the NRC of the SPPP update would enable the staff to verify if appropriate changes meet NISPOM and SEAD 3 requirements. If the changes do not meet the new requirements, the NRC will issue Requests for Additional Information.
  
- Could NRC outline the key objectives from the NISPOM ITP and SEAD 3 requirements that licensees should incorporate into internal training?
  - Staff Response: Yes, the staff are in the process of developing a website to provide more details on NISPOM ITP and SEAD 3. The website information will be communicated once it is available.

The staff's presentation concluded with an outline and summary of the expected next steps for NISPOM ITP and SEAD 3 implementation. Another public meeting may be scheduled, once the staff receive Commission direction.

Attached to this memo are the following: Enclosure 1, a list of attendees, and Enclosure 2 a copy of the presentation slides.

Enclosures:

1. List of Attendees
2. Presentation Slides

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OFFICE	NSIR/DSO/ISB	TA: NSIR/DSO	NSRI/DSO/ISB	BC: NSRI/DSO/ISB
NAME	AWilliamson	DJohnson	RRichardson	DParsons
DATE	4/11/2018	4/10/2018	3/ 29 /2018	4/11/2018

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List of March 12, 2018 Meeting Attendees

<u>Name</u>	<u>Affiliation</u>
William Gross	NEI
Hilary Lane	NEI
Ken Nicely	Exelon
Leonard Sueper	Exelon
Cindy Heimbach	Exelon
Margaret Earle	Dominion
Larry Wilson	Dominion
Michael Whitlock	Dominion
Gary Clark	CB&I AREVA MOX Services
Chuck Ryan	CB&I AREVA MOX Services
Jim Barnette	Luminant
B. Wade Mattox	GE Hitachi Nuclear Energy
Timothy Tate	Framatome
Pat Jenny	Global Laser Enrichment
LuAnn Bray	Cooper Nuclear Station
Cheryl Olson	Dairyland Power Cooperative
Robyn Savage	STP Nuclear Operating Company
Jay Bodnar	STP Nuclear Operating Company
Len Knox	STP Nuclear Operating Company
Walter Fulton	STP Nuclear Operating Company
John Lubinski	NRC
Mary Frances Woods	NRC
Amy Roundtree	NRC
Karl Sturzebecher	NRC
Doug Hase	NRC
Brian Smith	NRC
Marissa Bailey	NRC
Samuel Bazian	NRC
Lisa London	NRC
Sandra Schoenmann	NRC
Jake Zimmerman	NRC
Rebecca Richardson	NRC
Alicia Williamson	NRC
Darryl Parsons	NRC
Denis Brady	NRC
Jonathan Stone	Naval Reactors