



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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April 19, 2019

MEMORANDUM TO: Lisa Regner, Acting Branch Chief
Reactor Security Branch
Division of Physical and Cyber Security Branch
Office of Nuclear Security and Incident Response

FROM: Todd Keene, Technical Assistant */RA/*
Division of Security Operations
Office of Nuclear Security and Incident Response

SUBJECT: PUBLIC MEETING SUMMARY – STAFF’S FOLLOW-UP
ACTIONS IN RESPONSE TO STAFF REQUIREMENTS
MEMORANDUM-SECY-17-0100, "SECURITY BASELINE
INSPECTION PROGRAM ASSESSMENT RESULTS AND
RECOMMENDATIONS FOR PROGRAM EFFICIENCIES."

On December 17, 2018, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff, utility groups, and other stakeholders at NRC headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852. The NRC staff discussed the status of follow-up actions in response to Staff Requirements Memorandum (SRM)-SECY-17-0100¹, "Security Baseline Inspection Program Assessment Results and Recommendations for Program Efficiencies." The public meeting notice² was issued on December 3, 2018, and was posted on the NRC's external (public) web page.

There were 25 industry representatives, including a representatives from the Union of Concerned Scientists and the Nuclear Energy Institute (NEI), and 10 NRC staff representatives in attendance. The list of attendees is provided in the attached enclosure.

NRC staff members from the Office of Nuclear Security and Incident Response (NSIR) Division of Physical and Cyber Security, Reactor Security Branch provided a presentation³ that outlined the staff's draft options for crediting operator actions (OA), FLEX and law enforcement response. The staff also presented a conceptual model of the force-on-force significance determination process⁴ and an overview of how it could be used to provide additional credit for OA and FLEX equipment.

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¹ Agencywide Documents Access and Management System (ADAMS) Accession No.: ML18283A072

² ADAMS Accession No.: ML18348A616

³ ADAMS Accession No.: ML18347B458

⁴ ADAMS Accession No.: ML18348A957

The purpose of the meeting was to obtain stakeholder feedback on questions⁵ that were presented to stakeholders in advance of the meeting to assist in the development and refinement of the proposed options. In response to the questions, NEI presented slides⁶ that clarified NEI member's position regarding regulatory guide 5.81, "Target Set Identification and Development for Nuclear Power Reactors," and provided an overview of NEI's proposed implementation of the security bounding time (SBT) concept.

The following comments are a summary of the meeting discussion:

- NRC staff stated that the staff believes that there is merit in the concept of crediting law enforcement response, however the staff has reservations concerning the SBT methodology.
- NRC staff provided an overview of the options that are being explored regarding crediting of operator actions and law enforcement response.
- NRC staff posed several questions to NEI and industry representatives asking for feedback of the various options (sliding scale; SBT concept).
- NEI presented an overview of credit for operator and mitigation actions and the SBT. The presentation included examples of how the SBT would be applied to a plant.
- NRC staff requested clarification regarding advantages and disadvantages of the proposed changes to Regulatory Guide 5.81, Criterion 3, Precluding Adversary Interference.
- NRC Staff discussed the draft force-on-force significance determination process and how it may be used to credit operator action and the use of FLEX equipment.
- NEI committed to provide written responses to questions raised during the meeting regarding NRC and NEI presentations.
 - NEI responded to the meeting questions in a letter "Supplemental Responses to NRC Staff Questions Discussed in Public Meeting on December 17, 2018" dated January 9, 2019 (ADAMS Accession No.: ML19024A498).

Attendees were reminded during the meeting that although their questions and comments were discussed with the staff, no policy decisions would be made at the meeting.

Enclosure:
Attendee List

⁵ ADAMS Accession No.: ML18348A982

⁶ ADAMS Accession No.: ML18348B146

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