



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MAY 30 1979

MEMORANDUM FOR: Reactor Safeguards Licensing Branch Members
Division of Operating Reactors, NRR

FROM: Robert A. Clark, Chief
Reactor Safeguards Licensing Branch
Division of Operating Reactors

SUBJECT: ACCEPTANCE CRITERIA FOR NUCLEAR
POWER PLANT SAFEGUARDS CONTINGENCY
PLANS - REVIEW GUIDELINE #24

Enclosed are the contingency plan acceptance criteria to be
used in the review of licensee contingency plans.

A handwritten signature in cursive script that reads "Robert A. Clark".

Robert A. Clark, Chief
Reactor Safeguards Licensing Branch
Division of Operating Reactors
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: J. R. Miller
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ACCEPTANCE CRITERIA FOR NUCLEAR POWER PLANT

SAFEGUARDS CONTINGENCY PLANS

REVIEW GUIDELINE #24

MAY 1979

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INTRODUCTION

This acceptance criteria serves to amplify the information provided in Appendix C to Part 73 and Regulatory Guide 5.54. It also provides the basis for conducting a formal evaluation of safeguards contingency plans.

The contingency plan provides the framework for developing detailed response procedures and, therefore, is a generic, non-specific document, for the most part. Information required in a contingency plan that is adequately addressed in the facility's Physical Security Plan is not required to be repeated. However, when reference is made to the Physical Security Plan, it shall be verified to ensure the information meets the requirements of this contingency planning acceptance criteria.

There is no requirement to submit the procedures to the Commission for approval. Therefore, this document does not include any criteria or review procedure relative to the procedures which will be inspected by the Office of Inspection and Enforcement.

CONTINGENCY PLAN ACCEPTANCE CRITERIA

1. GENERAL REQUIREMENTS FOR FIXED SITES (73.40(c))

Acceptance Criteria 1.1 - The plan shall confirm that prior to the plan becoming effective, the licensee shall have:

- (1) All safeguards capabilities specified in his safeguards contingency plan available and functional,
- (2) Detailed Procedures developed according to Appendix C to 10 CFR 73 available at the licensee's site, and
- (3) All appropriate personnel trained to respond to safeguards incidents as outlined in the plan and specified in the detailed Procedures.

Acceptance Criteria 1.2 - The plan shall provide for a review at least every twelve months of the safeguards contingency plan by individuals independent of both security program management and personnel who have direct responsibility for implementation of the security program. The review shall include a review and audit of safeguards contingency procedures and practices, an audit of the security system testing and maintenance program, and a test of the safeguards system along with commitments established for response by local law enforcement authorities. The results of the review and audit, along with recommendations for improvements, shall be documented, reported to the licensee's corporate and plant management, and kept available at the plant for inspection for a period of two years.

Evaluation Findings:

Prior to _____ the licensee shall have:

- (1) All safeguards capabilities specified in his safeguards contingency plan available and functional,
- (2) Detailed Procedures developed according to Appendix C to this part available at the licensee's site, and
- (3) All appropriate personnel trained to respond to safeguards incidents as outlined in the plan and specified in the detailed Procedures.

Based on our review, we conclude that the contingency plan will be implemented in accordance with the requirements of 73.40(c) and is acceptable.

The licensee's _____ department conducts a review and audit of safeguards contingency procedures at least once each 12 months. The department consists of individuals independent of both security program management and personnel who have direct responsibility for implementation of the security program. The review includes a review and audit of safeguards contingency procedures and practices, and audit of the security system testing and maintenance program, and a test of the safeguards system along with commitments established for response by local law enforcement authorities. The results of the review and audit, along with recommendations for improvements, shall be documented, reported to _____ and kept available at the plant for inspection for a period of two years.

Based on our review, we conclude that the testing, maintenance and audit program meets the requirements of 73.40(d) and is acceptable.

2. APPENDIX C BACKGROUND

Acceptance Criteria 2.1 - The plan shall contain a statement of the perceived danger to the security of special nuclear material, licensee personnel, and licensee property, including industrial sabotage, and overt attacks. The statement of perceived danger conforms with that promulgated by the Nuclear Regulatory Commission. (The statement contained in 10 CFR 73.55(a) or subsequent Commission statements will suffice.)

Acceptance Criteria 2.2 - The plan shall state the purpose of the plan. This shall be a discussion of the general aims and operational concepts underlying implementation of the plan.

Acceptance Criteria 2.3 - The plan shall contain the scope of the plan. The scope should include in addition to those contingencies contained in NUREG-0220, hostage and extortion events.

Acceptance Criteria 2.4 - The plan shall contain a list of terms and their definitions used in describing operations and technical aspects of the plan.

Evaluation Findings:

The licensee has provided the following information:

- (1) A statement of the perceived danger to the security of special nuclear material, licensee personnel, and licensee property.
- (2) A discussion of the general aims and operational concepts underlying implementation of the plan.
- (3) A delineation of the types of incidents covered in the plan.
- (4) A list of terms and their definitions used in describing operational and technical aspects of the plan.

Based on our review, we conclude the background information provided meets the requirements of Section 1 (Background) of Appendix C to 10 CFR 73 and is acceptable.

3. APPENDIX C - GENERIC PLANNING BASE

Acceptance Criteria 3.1 - The plan shall identify those events that will be used for signaling the beginning or aggravation of a safeguards contingency* according to how they are perceived initially by licensee's personnel.

Acceptance Criteria 3.1.1 - The licensee shall provide coverage for the following:

*NRC Notification of Safeguards Events

Establish that for each safeguards contingency event there is a prompt and immediate notification of the appropriate Regional Office. This is in addition to whatever concerned parties, such as LLEA, the licensee deems necessary to notify. This commitment can be incorporated into the responsibility matrix of the contingency plan.

1. Loss or degradation of the intrusion detection systems.
 - A. Single Zone
 - B. More Than One Zone

2. Loss or degradation of the alarm annunciation system(s).

3. Loss or degradation of the protected area barrier lighting systems.

4. Loss or degradation of the security systems' power.
 - A. Primary
 - B. Emergency Stand-by
 - C. Both Primary and Emergency Stand-by

5. Damage to or degradation of the security barriers.
 - A. Vital Areas
 - B. Protected Areas

6. Failure, degradation, or compromise of the electrical/mechanical access control devices, or systems.

7. Loss or degradation of the communications systems.
 - A. Onsite
 - B. Offsite

8. Degradation or unavailability of security force.
9. A tampered alarm.
 - A. Vital Area
 - B. Protected Area
10. Attack threat.
11. Aberrant behavior on the part of an employee.
12. Civil disturbances.
 - A. Non-Violent
 - B. Violent
13. Bomb.
 - A. In Vital Area
 - B. In Protected Area
14. Detection of unauthorized personnel, vehicles, devices, equipment, or material.
 - A. In a Vital Area
 - B. In the Protected Area

15. Discovery of sabotage devices, other contraband or evidence of sabotage.
 - A. Vital Area
 - B. Protected Area

16. Discovery of intrusion indications.
 - A. In the Vital Area
 - B. In the Protected Area

17. Bomb threat.

18. Hostage Situation.

19. Direct armed attack on plant.

20. Extortion threat.

21. Assessment personnel fail to make a report.

22. Offsite indication of security problems.

Discussion: The plan need not specifically identify each of the above events. NRR has suggested that events be grouped under event descriptions if the responses to the events are the same. Therefore, this is acceptable and encouraged. The reviewer must ensure that the event categories cover the

above events or determine why the event is not applicable to that site.

Acceptance Criteria 3.2 - The plan shall define specific objectives to be accomplished relative to each event identified. The objective may be to obtain a level of awareness about the nature and severity of the safeguards contingency in order to prepare for further responses; to establish a level of response preparedness; or to successfully nullify or reduce any adverse safeguards consequences arising from the the contingency.

Acceptance Criteria 3.3 - The plan shall specify for each event or event category the specific decisions, actions, and supporting information needed to bring about such responses.

Acceptance Criteria 3.4 - Decisions/actions statements shall present a sequential flow of information that shows the progression from event to objective.

Evaluation Findings:

The licensee has provided the following:

- (1) Those events that will be used for signaling the beginning or aggravation of a safeguards contingency according to how they are perceived initially by licensee's personnel.
- (2) The specific objective to be accomplished relative to each identified event.

- (3) The specific decisions, actions, and supporting information needed to bring about such responses.

Based on our review, we have concluded that the Generic Planning Base meets the requirements of Section 2 (Generic Planning Base) of Appendix C 10 CFR 73 and is acceptable.

4. LICENSEE PLANNING BASE

Discussion: To the extent that the following is treated in adequate detail in the licensee's approved physical security plan, it may be incorporated by cross reference to that plan.

Acceptance Criteria 4.1 - The plan shall contain a delineation of the organization's chain of command and delegation of authority as these apply to safeguards contingencies.

Acceptance Criteria 4.2 - The plan shall contain a description of the physical structures and their location on the site, and a description of the site in relation to nearby town, roads, and other environmental features important to the effective coordination of response operations. Particular emphasis should be placed on main and alternate entry routes for law enforcement assistance forces and the location of control points for marshalling and coordinating response activities.

Acceptance Criteria 4.3 - The plan shall contain a description of the physical security hardware that influence how the licensee will respond to an event.

Acceptance Criteria 4.4 - The plan shall contain a listing of available local law enforcement agencies and a description of their response capabilities and their criteria for response; and a discussion of working agreements or arrangements for communicating with these agencies.

Acceptance Criteria 4.5 - The plan shall contain a discussion of State laws, local ordinances, and company policies and practices that govern licensee response to incidents. Examples that may be discussed include:

- Use of deadly force;
- Use of employee property;
- Use of off-duty employees;
- Site security jurisdictional boundaries.

Acceptance Criteria 4.6 - The plan shall contain descriptions of licensee practices that may have influence on the response to safeguards contingency events. The considerations shall include a description of the procedures that will be used for ensuring that all equipment needed to effect a successful response to a safeguards contingency will be easily accessible, in good working order, and in sufficient supply to provide redundancy in case of equipment failure.

Evaluation Findings:

The licensee has provided the following:

- (1) A delineation of the organization's chain of command and delegation of authority as these apply to safeguards contingencies.
- (2) A description of the physical structures and their location on the site and a description of the site in relation to nearby towns, roads and other environmental features important to the effective coordination of response operations.
- (3) A description of the physical security hardware that influence how the licensee will respond to an event.
- (4) A listing of available local law enforcement agencies and a description of their response capabilities and their criteria for response; and a discussion of working agreements or arrangements for communicating with these agencies.
- (5) A discussion of State laws, local ordinances, and company policies and practices that govern licensee response to incidents.
- (6) Descriptions of licensee practices that may have an influence on the response to safeguards contingency events.

Based on our review, we have concluded that the Licensee Planning Base meets the requirements of Section 3 of Appendix C to 10 CFR 73 and is acceptable.

5. RESPONSIBILITY MATRIX

Acceptance Criteria 5.1 - The plan shall contain a responsibility matrix. For each initiating event, a tabulation shall be made for each response entity depicting the assignment of responsibilities for all decisions and actions to be taken in response to the initiating event. (Not all entities will have assigned responsibilities for any given initiating event.) The tabulations in the Responsibility Matrix shall provide an overall picture of the response actions and their interrelationships. Safeguards responsibilities shall be assigned in a manner that precludes conflict in duties or responsibilities that would prevent the execution of the plan in any safeguards contingency.

Acceptance Criteria 5.11 - All the initiating events or event categories identified in the generic planning base shall be included in the responsibility matrix.

Acceptance Criteria 5.12 - The safeguards tasks assigned to response entities shall not conflict with other assigned duties or responsibilities.

Acceptance Criteria 5.13 - The decision/action within the responsibility matrix shall be the task identified as decisions and actions in the generic planning base.

Evaluation Findings:

The licensee has provided for each initiating event, a tabulation for each response entity depicting the assignment of responsibilities for all decisions and actions to be taken in response to the initiating event.

The safeguards responsibilities are assigned in a manner that precludes conflict in duties or responsibilities that would prevent the execution of the plan in any safeguards contingency.

Based on our review, we have concluded that the Responsibility Matrix meets the requirements of Section 4 of Appendix C of 10 CFR 73.

6. CONCLUSIONS

Based on our evaluation of the licensee's contingency plan program, we conclude that the licensee meets the requirements of 10 CFR 73.40 and Appendix C of 10 CFR 73.