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

MAY 26 1978

MEMORANDUM FOR: Reactor Safeguards Licensing Branch

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

SUBJECT: UNRESOLVED ISSUES - REVIEW GUIDELINE NUMBER 22

If, in the course of the review of the §73.55 security plan there arises, on a site specific basis, an issue that cannot be resolved in the discussions between the staff and the licensee, the review team leader will prepare a letter that will be sent to the licensee stating the requirement(s) that will be placed on the licensee in the Security Plan Evaluation Report (SPER) so that the security plan will meet the performance requirements of §73.55 and can be found acceptable by the staff. (e.g. "We will require the licensee to include the containment building area in his list of Vital Areas.") The requirement, so stated, will be incorporated into the Site Security Plan, as a condition for approval, when the SPER is issued.

Upon receipt of the letter of notification, the licensee may initiate the NRR appeal process through the licensing project manager if he finds the requirement unacceptable. If, upon completion of the appeal process the requirement has not been removed, the licensee may elect to incorporate the requirement into his Security Plan or to propose a compensating measure that will provide equivalent protection. In that event, a license amendment will be processed in accordance with §50.90 and §50.91 to identify the Security Plan, submitted by the licensee in compliance with §73.55, as the approved plan for the site and as a condition of the operating license.

In the event the licensee does not provide the required protection, the license amendment will be processed identifying the submitted Security Plan as the approved plan for the site and as a condition of the operating license. This is to be followed immediately with an Order for Modification of License, in accordance with 10 CFR 2.204, to incorporate the staff requirements into the license (i.e. the security plan).

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

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NOV 06 1978

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

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

SUBJECT: PROTECTION OF NUCLEAR POWER PLANTS AGAINST INDUSTRIAL SABOTAGE BY THE INSIDER - REVIEW GUIDELINE #23

In order to meet the general performance requirements of §73.55(a), high assurance protection of a nuclear power plant against the threat of sabotage posed (1) with the active or passive assistance of an insider or (2) by an insider acting alone must be provided. Common to most scenarios that can be postulated for successful sabotage by a single insider, is the need for unrestricted access to vital areas* and unrestricted time in these vital areas. Consequently, security measures that place controls on access to Vital I vital areas and/or limit the time allowed in Type I vital areas must be provided to meet the general performance objective of §73.55(a). We have encouraged licensees to develop security measures to achieve these objectives.

High assurance protection against sabotage by an insider may also be provided by security measures that permit unescorted access to Type I vital areas to only those individuals whose reliability and trustworthiness has been established using additional procedures that provide a high level of confidence.

The following measures, when properly applied in conjunction with those security measures implemented by the security plan to meet the requirements of §73.55 (b) through (h) provides an acceptable level of protection against sabotage by the insider.

General

A. Persons who are granted unescorted access to a Type II vital area (1) must have a need for access and (2) must have been found acceptable through a screening program described in ANSI N18.17-1973 Section 4.3 or the equivalent satisfactory employment record described in Review Guideline #1.

B. Persons who are granted access to a Type I vital area (1) must have a need for access, (2) must have been found acceptable through a screening program described in ANSI N18.17-1973 Section 4.3 (or Review Guideline #1).

* Vital areas are discussed in Review Guideline #17

and (3) must be authorized entry by the shift supervisor or other designated individual who has been informed of the estimated length of time to be spent in the Type I vital area. Authorization must be given on the shift the first entry is to be made and should terminate upon completion of the work. Extension of the authorization into the next shift can be made by the shift supervisor (or designated individual) informing his replacement for the next shift of the area, the work in progress and the personnel who have been authorized for entry.

C. Each of the following options when applied in conjunction with the provisions in (B) above provide acceptable levels of protection against sabotage by a single insider.

Option #1: Compartmentalization

The erection of barriers, installing doors, gratings or compartments to enclose vital equipment so that access to a single vital area cannot result in successful sabotage (i.e., eliminate Type I vital areas).

Option #2: Two-Man Rule

(a) Two or more individuals may be authorized to enter a Type I vital area together (1) if each person is advised of his responsibility to monitor the activities of his co-workers while in the area, (2) each individual is determined to have the knowledge and ability to identify unauthorized activities if conducted by his co-workers, (3) each individual must have the capability to observe, at any time and for as long as necessary to ascertain that activities are authorized, and (4) the capability to communicate with the control room or CAS/SAS must be available to each individual while in the Type I vital area.

OR

(b) Monitoring of the activites of one or several persons in certain Type I vital areas by an individual can be performed from a remote location (CCTV) providing the assigned individual has the knowledge and ability to identify unauthorized activities and can initiate a response to control and/or correct the situation.

Several examples are given below to illustrate the practical application of this procedure.

EXAMPLE:

Two men are both working on a task which requires that they be located within sight of one another; however, the task also requires that they do not normally

face one another. The nature of the task does not prevent them from observing one another. This situation satisfies the above guidelines.

EXAMPLE:

Two men are both working on a task together. One man leaves the immediate area (but not the VA) to retrieve a part; he is out of eyesight for a few minutes. Nothing prevents his partner from following him to check on his whereabouts and nothing prevents the other man from returning at any time. This situation satisfies the above guidelines.

EXAMPLE:

Health physics personnel require knowledge of an individual's entrance into a VA and records time of entrance and work request authorizing. There is visual contact between HP and individual no less frequent than every 10 minutes and the capability for visual contact at any time. This satisfies the guideline.

Option #3: Personnel Reliability

The following may be permitted entry into Type I vital areas without escort or monitoring:

(a) An individual granted an NRC "Q" clearance;

OR

(b) An individual with (1) five years continuous service in a position that required access to a nuclear power plant Type I vital area; (2) certification by employer of trustworthiness and reliability based on observation of the employee during this service; and (3) a NRC sponsored NAC investigation (or its equivalent) has been completed with favorable results;

OR

(c) An individual with (1) a NRC granted operator license; (2) certification by employer of trustworthiness and reliability based on observation of the employee, and (3) a NRC sponsored NAC investigation or its equivalent has been completed with favorable results.

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

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WASHINGTON, D. C. 20555

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.

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

Enclosure: As stated

cc: J. R. Miller
F. G. Pagano

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

FEB 04 1980

MEMORANDUM FOR: Physical Security Licensing Branch

FROM: George W. McCorkle, Chief
Physical Security Licensing Branch

SUBJECT: ACCEPTABLE COMPENSATORY MEASURES FOR PROTECTED AND VITAL AREA INTRUSION DETECTION HARDWARE OUTAGE - REVIEW GUIDELINE NUMBER 9, REVISION 1

The requirement of perimeter and vital area intrusion detection hardware is to instantaneously detect the unauthorized entry or attempted entry of individuals or vehicles into protected and vital areas. This "alert" provides the initiating action for immediate response by the site security force to protect vital equipment.

In the event of a hardware outage the compensatory measures must satisfy the above requirement by providing a means for immediate detection of unauthorized entry. The following two measures are examples of the minimum acceptable compensatory measures for a total or sectional failure of the protected area or vital area intrusion detection system.

a) Deployment of a back-up intrusion detection system.

b) Deployment of on-the-spot guards with appropriate communication to provide total observation of each affected protected area zone or vital area portal.

This guideline is applicable to both 73.55 Security Plan and Appendix C Contingency Plan reviews.

George W. McCorkle, Chief
Physical Security Licensing Branch