

SEP 5 1990

Official

MEMORANDUM FOR: Phillip F. McKee, Chief
Safeguards Branch
Division of Reactor Inspection and Safeguards
Office of Nuclear Reactor Regulation

FROM: William E. Cline, Chief
Nuclear Materials Safety and Safeguards Branch
Division of Radiation Safety and Safeguards

SUBJECT: RECOMMENDATIONS TO REDUCE UNNECESSARY RESOURCES SPENT
HANDLING POWER REACTOR SAFEGUARDS INFORMATION

Reference is made to Mr. Robert Martin's July 2, 1990, memorandum to Dr. Murley, subject referenced above, which was also provided to Region II.

We concur generally with the proposed reduction in the amount of safeguards material possessed and maintained by both the NRC and licensees, and we agree that a considerable amount of overclassification of Safeguards Information occurs. However, many of the proposed concepts for reducing the volume of safeguards does not appear feasible in light of the necessity for the availability of plans and procedures for use by the security force and other functional areas. While a considerable amount of the material contained in plans and procedures is not Safeguards Information, other information that is pertinent is safeguards and, in many instances, must be included in reports, plans, and procedures.

It further appears that a major initiative to declassify portions of existing plans, procedures, and reports as proposed would require considerable effort and would not be cost-effective. It would appear to be more feasible to encourage restraint in overclassification of material through emphasis applied during inspections and possibly an Information Notice, with self-restraint practiced by the Agency in-house. Inspectors should be reminded to document inspections and related correspondence to the extent possible without divulging Safeguards Information with adherence monitored during document review and coordination.

COMMENTS ON INDIVIDUAL CONCEPTS PROPOSED ARE AS FOLLOWS:

Concept 1: Prepare physical security notices of violation (NOVs) without including SGI.

Agree where possible. However, in most instances the inclusion of Safeguards Information is necessary to clearly demonstrate the extent or degree of violation of regulatory requirements.

Concept 2: Reduce the distribution lists for documents containing SGI.

Agree to the extent feasible.

Concept 3: Recommend licensees decontrol portions of their Physical Security Plans that are not SGI.

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If the intent is to mark or identify portions of plans that do not contain Safeguards Information accordingly, that would appear advantageous in some respects. However, the overall benefit does not appear to be beneficial since the plan or document must be identified and protected in the manner appropriate for the highest category (safeguards) of material contained therein.

Concept 4: Refrain from marking documents SGI that only provide information available from FSARs.

Agree with the proposal providing specific locations, equipment contained therein, and method of gaining access is not discussed.

Concept 5: Prepare physical security information reports without including SGI.

Disagree as a matter of routine. Any routine inspection report should document security force capabilities, relative compliance with regulatory requirements, and Physical Security Plan commitments. Specific deficiencies as well as the circumstances and contributing factors involved in security violations must be documented to support the violation issuance and subsequent followup and closeout.

Concept 6: Routinely review and decontrol old documents that were originally marked SGI and that are no longer viewed as containing SGI.

Agree, providing review can be accomplished without unduly burdening available administrative and inspector resources. Should appropriately be accomplished in conjunction with record retirement actions.

Concept 7: For a physical security inspection that does not identify a violation or an unresolved item, issue a non-SGI generic form letter that does not specify details of the inspection.

Disagree. Inspection findings, observations, and results are the basis for SALP inputs and document inspector conclusions relative to security effectiveness, assessment of equipment adequacy, and personnel ability to defend the facility against the postulated threat.

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cc: (See page 2)

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