



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

SEP 14 1982

Denton
• Why not Reg I - lots of Sec
• Reg V should be involved
• Report of 3/83 is to whom?
- CRR
• IS 3/83 accepted
• Why going public?

MEMORANDUM FOR: Distribution (See attached List)
FROM: Robert F. Burnett, Director
Division of Safeguards
SUBJECT: SAFETY/SAFEGUARDS REVIEW COMMITTEE

In response to the Chairman's August 16, 1982 memo (copy attached) concerning safety/safeguards issues at power reactors, we have also drafted the attached charter which describes the proposed responsibilities of a committee to examine these issues. As indicated in the charter, appropriate Offices and Regions II and III should designate senior individuals to serve on the committee. Regions I and III members will focus on safeguards and reactor issues, respectively, while the remaining Regions are requested to monitor and comment on the effort.

Tom Allen and Priscilla Dwyer, NMSS, SGPR, FTS-427-4010 are the contacts on this matter. Please transmit your comments along with name of nominee member, as appropriate, to them no later than c.o.b., September 24, 1982.

Robert F. Burnett, Director
Division of Safeguards, NMSS

Attachments:
As stated

*Z WRR
DHS + DL*

8210190095 820930
PDR MISC

PDR

DISTRIBUTION:

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Region V



CHAIRMAN

UNITED STATES
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August 16, 1982

MEMORANDUM FOR: William J. Dircks, Executive
Director for Operations

FROM: Nunzio J. Palladino *NJP*

SUBJECT: SAFEGUARDS REQUIREMENTS AT POWER
REACTORS

Commissioner Gilinsky recently visited San Onofre and observed that the security at the site is encumbering to the point where he wonders if it may impact safety. During my visits to Diablo Canyon and to La Salle, I also have observed security is encumbering and have seen indications that it may impact safety.

I request that you direct the Staff to conduct a re-analysis of the NRC's physical security requirements at nuclear power plants. Their review should determine (1) what security requirements now in place may adversely impact safety of plants, and how; (2) alternative protection measures that would lessen possible adverse impacts on safety while, as a goal, not decreasing overall plant security; and (3) safety and safeguards requirements which may be redundant (e.g., access logs). The analysis should take advantage of the full range of Staff expertise and perspectives, in both safety and safeguards. The analysis also should recognize existing Staff initiatives in this area. For example, the proposed "insider" rule contains trade-offs which may reduce the degree of control of access to vital areas at power reactors.

The Commission does not consider that the level of safeguards protection is too great for nuclear power reactors. Rather, the Commission is interested in a reexamination of the safety-safeguards relationship with the objective of determining ways of reducing the impact of safeguards on safety.

Rec'd Off. EDO

Date..... 8-17-82

Time..... 8:15 A

I request that you provide a program plan and schedule for accomplishing this project to the Commission in approximately a month.

cc: Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
OPE
OGC
OIA
SECY

Safety/Safeguards Review Committee

I. Background

The goals of safety and safeguards systems at nuclear power plants are identical, specifically, to protect the public health and safety. Questions have been raised about the measures employed to achieve these goals which on occasion may be in conflict with one another. Any such conflicts or potential conflicts need to be identified and resolved.

The Staff recently received a memorandum from the Chairman expressing concern over the possible impact of safeguards activities on plant safety. The Chairman requested a reexamination of the safety/safeguards issue to:

1. Determine what security measures may adversely affect safety.
2. Determine what alternative protection measures are available that may reduce such conflict.
3. Identify redundant safety and safeguards requirements.

The Chairman specifically indicated that the proposed "Insider Rule" may contain measures that will help to resolve possible safety/safeguards conflicts.

This charter outlines the responsibilities of a committee to be formed to develop strategies for resolving questions posed by the Chairman.

II. Committee Responsibilities

1. To determine the degree and scope of safeguards that may be in conflict with established power reactor safety goals.
2. To determine if any such problems stem directly from NRC regulations, or from improper implementation. To identify needed near and long term remedial actions.

- 3. To reexamine present or proposed safeguards for countering the insider threat with specific emphasis on the concept of vital equipment/area protection.
- 4. To develop a strategy to reduce safety/safeguards conflicts.

III. Membership

Membership will be designed to provide the full range of both safety and safeguards perspectives. One senior staff member from each of the following organizations will participate:

Co-Chair: NRR/NMSS

Burnette (handwritten note with arrow pointing to NRR/NMSS)

Members:

- RII
- RII1
- RES
- IE
- AEOD

IV. Focus

The Committee should examine the range of options for resolving conflicts in the safety-safeguards area. In so doing, recognition should be afforded to recent initiatives which contemplate a shift in emphasis from present requirements, which are hardware oriented, to ones which provide improved flexibility and employ a more balanced safeguards approach. The Committee should determine if the Insider Rule Package with appropriate safety/safeguards questions for public comment should be published immediately to aid in their analysis and to focus public response on particular safeguards measures. Pending receipt of possible public input for Committee analysis, the Committee should review existing data which addresses the issue of conflicts between safeguards and safety measures. Special emphasis should be afforded to identifying possible trade-offs resulting from programs such as personnel trustworthiness and reconfiguration of vital areas. Consideration should also be given to using existing safety and fire protection barriers for achieving safeguards objectives and vice versa.

DRAFT

The following items should be addressed in the review of the safety/safeguards area:

- o The purpose for compartmentalization of vital equipment - Why not treat total building or facility as one vital area?
- o The issue of whether the safety/safeguard "problem" produces sufficient safety concerns to justify no compartmentalization.
- o Experience with respect to malevolent acts by reactor employees, recognizing that we currently require no clearance or screening.
- o Added assurances of trustworthiness gained through personnel screening.
- o Practices and experience of other agencies with analogous protection situations.
- o Parallels between reactors and fuel plant requirements--and differences.
- o ACRS concerns for reactor safeguards, including design considerations to prevent sabotage.

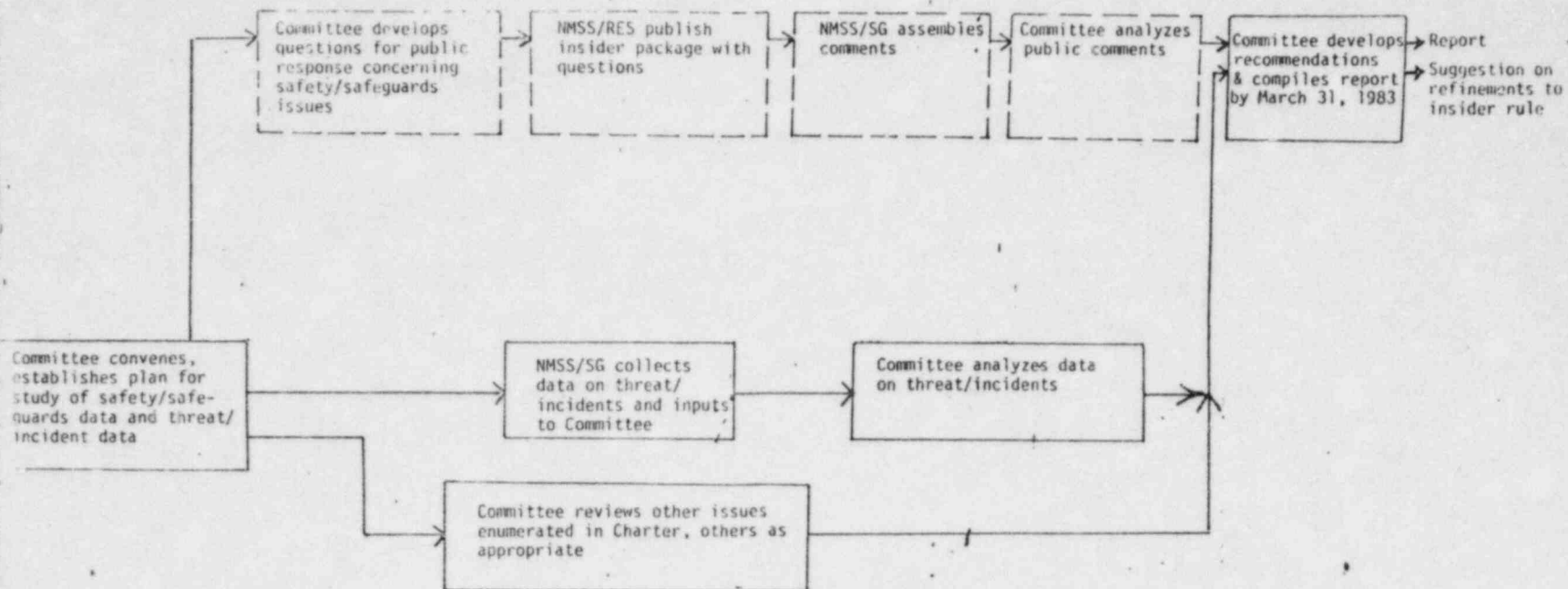
IV. Schedule

Office Directors and appropriate Regional Administrators will nominate participants on or about September 24, 1982.

As indicated in Attachment A, the Committee's report should be completed by March 31, 1983.

FLOWCHART FOR STUDY OF SAFETY/SAFEGUARDS INTERFACE ISSUE

DRAFT



LEGEND

- _____ : definite action
- - - - - : action pending
- Committee plans