



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

January 24, 1977

I 34 of comment. Attached
A. R. Chapman
2. SG
3. SH. S. ...
1/31 Judy
cc to Judy
7. E. Lewis
Comments

I have the distinct impression
that 56 philosophy is being
lost in the details - Two
things should shine through -
a) flexibility in designing
56 systems

MEMORANDUM FOR: Safeguards Working Group
FROM: L. J. Evans, Jr., Chief
Requirements Analysis Branch
SUBJECT: UPGRADE SCHEDULE AND WORKING GROUP RESPONSIBILITIES

As a result of the comments received on the draft Safeguards Upgrade Schedule and Working Group Responsibilities charts circulated on January 13, they have been modified and finalized. The final versions of each are attached for your information and use.

As you are aware, we are operating under very tight time constraints, with a draft Safeguards Upgrade Rule due at the Commission on March 30. Therefore it is imperative that the task leader (the first "assigned person" listed for each task) assure that the due dates listed on the Safeguards Working Group Responsibilities chart are met. If it appears that any task will not be completed by the agreed date please inform me immediately, so that we can attempt to reallocate resources to prevent further slippage.

I will review the status of each task with the task leader on a weekly basis, at which time any unforeseen problems, additional requirements and coordination questions will be discussed.

As mentioned at the Working Group meeting last Friday, a number of draft products will be circulated to the Working Group over the next two months. The first of these products, a draft of Safeguards Upgrade Rule structure and an e.g. narrative of a performance capability integrated with illustrative safeguards system specifications from Part 73 will be circulated for comment on Wednesday. Out of necessity, we will require a three day turn-around for comments on these and all future products circulated. Your assistance in this regard will be most appreciated.

Bud Evans

L. J. Evans, Jr., Chief
Requirements Analysis Branch

Distribution:
See page 2

Enclosure

8212080008 821025
PDR FOIA
WEISS82-441 PDR

new approach
to 56 regulations
1/26

Distribution:

Safekeepers Upgrade File Working Group

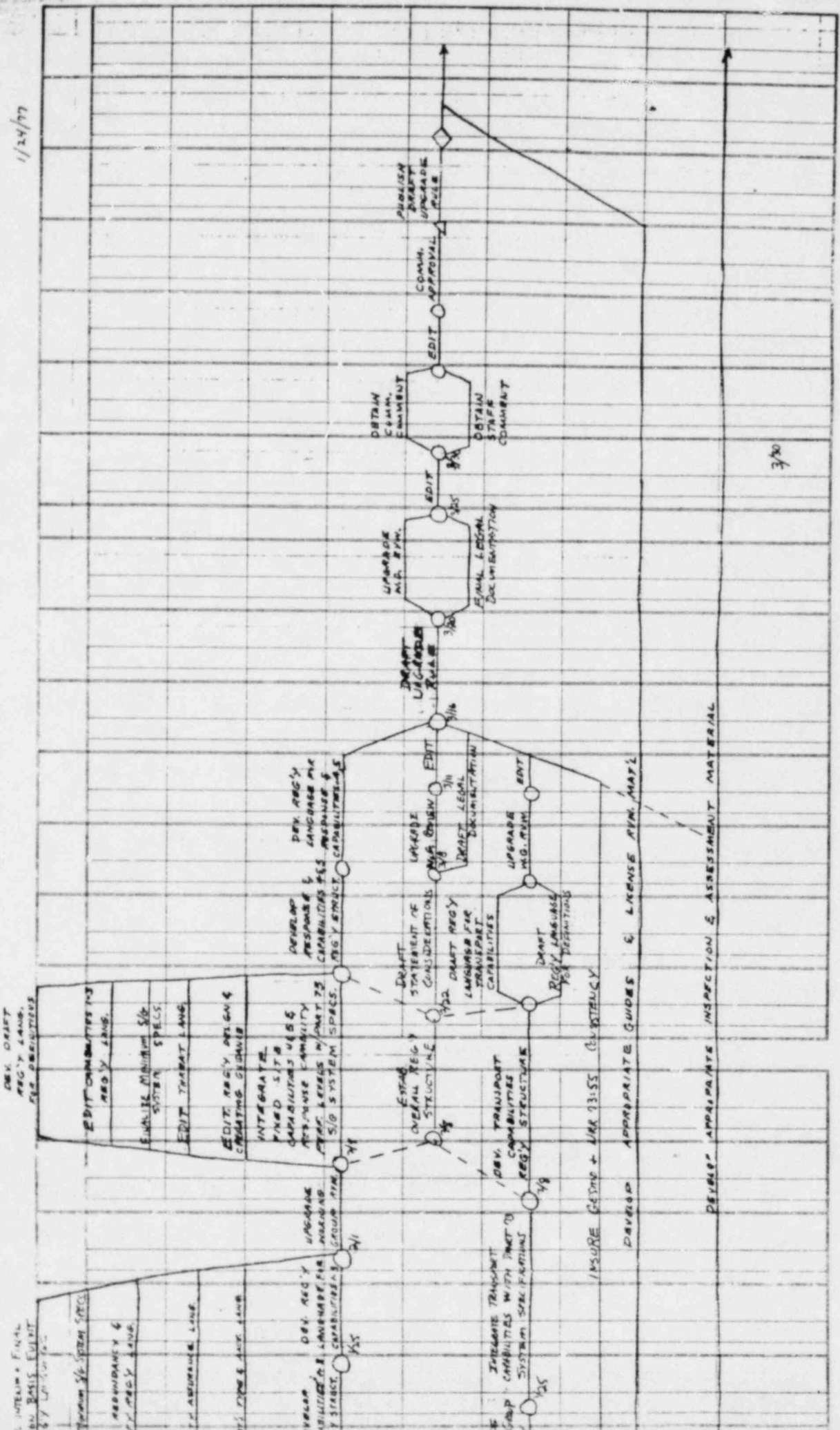
RJones (SD)
TMichaels (SG)
RFonner (ELD)
FSmith (SG)
DKasun (SC)
CSouth (SG)
BHatter (SG)
APoltorak (SG)
JMiller (NRR)

Information List

KChapman (NRR) ✓
RPage (SG)
BERickson (SG)
JPowers (SG)
TThayer (SG)
EDryghtsen (SG)
EPercovich (SG)
FArsenault (Res)
JLHicks (NRR)
Waller (IE)
TSherr (SG)
EMcAlpine (SG)
FCrane (SG)
SHuisen (SG)
JStanton (SG)
JKunz (SG)

SAFEGUARDS UPGRADE RFE SCHEDULE

1/24/77



3/78

SAFEGUARDS WORKING GROUP RESPONSIBILITIES

| | <u>ORGANIZATIONAL RESPONSIBILITY</u> | <u>PRESENT STATUS</u> | <u>PERSON(S) ASSIGNED</u> |
|---------------------------------------|--------------------------------------|------------------------------|---|
| Activities | o SG/RA | Continuous | Evans Management |
| nted Specifications (Capabilities) | o SG/RA; I&E | 25% complete | Poltorak/Nulsen Consistent Chambers* |
| ds System Specifics (e.g.,) | o SG/PS; SD; I&E | 10% complete | Kasun; Ramirez; Min Essent Chambers* of Vulnera |
| nted Specifications in Specifications | o SG/RA & PS; SD; I&E | 10% complete | Poltorak/Nulsen; Rule Struc Kasun; Preil; Chambers* |
| n Guidance (e.g., y & diversity) | o SD; SG/RA & PS | 50% complete | Michaels; Poltorak/ Draft lang Mullen; Kasun |
| siderations | o ELD | Begin 3/8 | Fonner Draft Rule |
| pplement Consistency | o SG/RA: SD; ELD | Begin 2/22 | Poltorak; Jones Compile Is Fonner |
| cy | o SGPP & SG/RA | Preliminary Work Begun | Hatter Compile li |
| Tech Reports | o NRR; SD; SG/RA | Begin ASAP | Miller; Jones Develop is Kunihiro |
| ans | o SD; SG/RA; Res | Preliminary Work Begun | Jones; Sutton Establish |
| cedures | o SG/RA, PS & MA, I&E | Preliminary Work Begun | Levy, Kasun; Analysis d M. Smith; Chambers* |
| res | o SG/T&E, PS, & RA; I&E | Preliminary Work Begun | South, Richard; Poltorak/.. Draft Man Sutton; Chambers |
| | o I&E, SG/T&E, PS & RA | Preliminary Work Begun | Chambers, South, Richard,.. Outline o Poltorak/Sutton |

Minimize

KEY: T&E

SAFEGUARDS WORKING GROUP RESPONSIBILITIES

| <u>FUNCTIONALITY</u> | <u>PRESENT STATUS</u> | <u>PERSON(S) ASSIGNED</u> | <u>IMMEDIATE PRODUCT</u> |
|----------------------|-----------------------------|--|--|
| | Continuous..... | Evans..... | Management Plan..... |
| I&E | 25% complete..... | Poltorak/Nulsen..... Chambers* | Consistent Disaggregation of BCs 1-3..... |
| SD; I&E | 10% complete..... | Kasun; Ramirez;..... Chambers* | Min Essential Sec Rqts. List & Rationale & Expl of Vulnerability if Missing <i>Had with 7</i> |
| PS; SD; | 10% complete..... | Poltorak/Nulsen;..... Kasun; Prell; Chambers* | Rule Structure for BCs 1-3 <i>Assignment is 7</i> |
| RA & PS | 50% complete..... | Michaels; Poltorak/ Mullen; Kasun | Draft lang. |
| | Begin 3/8 | Fonner..... | Draft Rule |
| SD; ELD | Begin 2/22..... | Poltorak; Jones Fonner | Compile Issue Papers |
| SG/RA | Preliminary Work Begun..... | Hatter..... | Compile list of potential inconsistencies..... |
| D; SG/RA | Begin ASAP..... | Miller; Jones Kunihiro | Develop issue list..... |
| RA; Res | Preliminary Work Begun..... | Jones; Sutton..... | Establish potential content..... |
| PS & MA, I&E | Preliminary Work Begun..... | Levy, Kasun;..... M. Smith; Chambers* | Analysis of Licensing information requirements |
| PS, & | Preliminary Work Begun..... | South, Richard; Poltorak/ Sutton; Chambers | Draft Manual..... |
| T&E, PS | Preliminary Work Begun..... | Chambers, South, Richard, Poltorak/Sutton | Outline of Task |

KEY: T&E-Test & Evaluation Branch MA-Material Accountancy
SGPP-Safeguards Policy

GUARDS WORKING GROUP RESPONSIBILITIES

| <u>PRESENT STATUS</u> | <u>PERSON(s) ASSIGNED</u> | <u>IMMEDIATE PRODUCT</u> |
|-----------------------------|--|---|
| Continuous..... | Evans..... | Management Plan..... |
| 25% complete..... | Poltorak/Nulsen..... Chambers* | Consistent Disaggregation of BCs 1-3..... |
| 10% complete..... | Kasun; Ramirez;..... Chambers* | Min Essential Sec Rqts. List & Rationale & Explanation... of Vulnerability if Missing <i>Identify Products</i> |
| 10% complete..... | Poltorak/Nulsen;..... Kasun; Prell; Chambers* | Rule Structure for BCs 1-3..... |
| 50% complete..... | Michaels; Poltorak/ Mulien; Kasun | Draft lang. |
| Begin 3/8..... | Fonner..... | Draft Rule..... |
| Begin 2/22..... | Poltorak; Jones..... Fonner | Compile Issue Papers..... |
| Preliminary Work Begun..... | Hatter..... | Compile list of potential inconsistencies..... |
| Begin 7/8/8..... | Miller; Jones..... Kunihiro | Develop issue list..... |
| Preliminary Work Begun..... | Jones; Sutton..... | Establish potential content..... |
| Preliminary Work Begun..... | Levy, Kasun;..... M. Smith; Chambers* | Analysis of Licensing information requirements..... |
| Preliminary Work Begun..... | South Richard; Poltorak/ Sutton; Chambers | Draft Manual..... |
| Preliminary Work Begun..... | Chambers, South, Richard, Poltorak/Sutton | Outline of Task..... |

KEY: T&E-Test & Evaluation Branch
 MA-Material Accounting Br.
 SGPP-Safeguards Plans & Policy

ES

| <u>PERSON(s) ASSIGNED</u> | <u>IMMEDIATE PRODUCT</u> | <u>IMMED DUE DATE</u> | <u>FINAL DUE DATE</u> |
|---|---|---------------------------|---------------------------|
| Evans | Management Plan | | |
| Poltorak/Nulsen Chambers* | Consistent Disaggregation of BCs 1-3 | 1/24 | 2/22 |
| Kasun; Ramirez; Chambers* | Min Essential Sec Rqts. List & Rationale & Explanation of Vulnerability if Missing | 1/28 | 2/22 |
| Poltorak/Nulsen; Kasun; Prell; Chambers* | Rule Structure for BCs 1-3 | 1/28 | 3/16 |
| Michaels; Poltorak/ Mullen; Kasun | Draft lang. | 2/8 | 2/22 |
| Fonner | Draft Rule | 3/16 | 3/25 |
| Poltorak; Jones Fonner | Compile Issue Papers | 2/15 | 3/16 |
| Hatter | Compile list of potential inconsistencies | 2/4 | 3/16 |
| Miller; Jones Kunihiro | Develop issue list | 2/15 | 3/16 |
| Jones; Sutton | Establish potential content | 2/28 | 4/30 |
| Levy, Kasun; M. Smith; Chambers* | Analysis of Licensing information requirements | 2/28 | 4/30 |
| South, Richard; Poltorak/ Sutton; Chambers | Draft Manual | 3/1 | 3/30 |
| Chambers, South, Richard, Poltorak/Sutton | Outline of Task | T.B.D. | T.B.D. |

Handwritten notes:
 1. ... is that ... to meet performance specs

KEY: T&E-Test & Evaluation Branch
 MA-Material Accounting Br.
 SGPP-Safeguards Plans & Policy
 RA-Rqnts Analysis Branch
 PS-Physical Security Branch
 *monitor only



UNITED STATES
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WASHINGTON, D. C. 20555

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MAR 1 1977

MEMORANDUM FOR: Bud Evans, Chief
Requirements Analysis Branch, NMSS

FROM: O. S. Chambers
Safeguards Program Branch, OIE

SUBJECT: COMMENTS ON SAFEGUARDS WORKING GROUP TASKS: (1) MINIMUM
ESSENTIAL CAPABILITIES, (2) DRAFT EIS, (3) DRAFT TRANS-
PORTATION CAPABILITIES and (4) BASIC CAPABILITY FOUR

Attached as enclosures are general comments for each of the above areas.

OS Chambers

O. S. Chambers

Enclosures:

- (1) Comments on Minimum Essential Capabilities
- (2) Comments on Draft EIS (February 10, 1977 memo)
- (3) Comments on Draft Transportation Capabilities
(February 24, 1977 and February 16, 1977 memos)
- (4) Comments on Basic Capability Four (February 24, 1977 memo)

IE COMMENTS ON MINIMUM ESSENTIAL CAPABILITIES

1. I am convinced that the Rule Upgrading project must reach a corporate agreement about what specific safeguards mechanisms (hardware systems, people, procedures) provide adequate protection for the range of threats. This must be done before we can select either the format for the performance section of the rule - or the basic/minimum essential requirements to supplement the performance statement.

For example, it is recognized that searches are necessary. Until we all reach an agreement about (1) what alternative methods are acceptable (hands-on, all walk through detectors, hand held instruments), (2) what procedures must be used for each alternative allowed, (3) where the searches must be conducted, (4) how many people are necessary to conduct the searches, and (5) what range of equipment performance is acceptable, we have not tackled the basic issue about what safeguards are adequate. How does one then determine how much more is necessary to protect against a more determined threat? Determine these issues and there is a logical basis for (1) agreement on an acceptance criteria (for inspections and for license review) (2) selecting what specific mechanisms must be stated in the rule, (3) how the rule should be stated, (4) what information is required in the security plans to render judgments about acceptability, and (5) what Commission policy should be contained as guidance issued to the licensees (Reg Guides, NUREGS, standard format and contents, and standard review plans).

- 2 -

2. If the 3rd level evaluation criteria in the Safeguards Handbook is an acceptable logical flow of requirements from the general to the more specific statement of performance, then, if we can all agree upon an acceptance criteria for the 3rd level evaluation criteria, we have the details needed for making the decisions required to select the performance statements and the supplemental specifications statements.

IE COMMENTS ON DRAFT EIS

1. There is a great deal of controversial policy stated in the EIS. See following statements.

2. Page 2

We disagree with the statement that the same basic capabilities apply to both fixed sites and in-transit systems.

Your statement ". . . they would be identified separately and differently in the regulations . . ." supports the thesis that they should also be treated in a separate EIS.

3. Page 2

We have mixed emotions about treating both transportation and fixed sites in this paper, or in the rule itself.

4. Page 5

The procedural requirements contained in par. (b) infringe on personal freedoms. This tends to negate the statement on page 6 ". . . no significant impact or quality of human environment is anticipated from implementations. . ."

5. Page 13

Who has evaluated the present regulations to determine that they provide a lower level of protection than is deemed necessary? Is it a problem of inadequate regulations, or is it a problem of inadequate interpretations of regulatory requirements?

6: Page 14

Disagree with logic of par. 3, More Specific Requirements. The problem is not in stating specific requirements, the problem is in not recognizing and expressing the fact that there are specific alternative solutions or designs. The last sentence is dangerous for the following reasons:

- It cannot be proven.
- The licensees do not know how to meet the goals.
- Flexibility of requirements connotes lack of knowledge by NRC of what it wants.
- It costs licensees a lot of money trying to anticipate what NRC wants and then changing it when NRC changes its mind.

IE COMMENTS ON DRAFT TRANSPORTATION REQUIREMENTS
(February 16, 1977 Memo)

1. We need to reach a corporate agreement about what detailed safeguard measures are required for transportation - before we proceed further.

(FEB 16, 1977 MEMO)

2. We feel that the five basic capabilities for fixed site safeguards can ^{not} or should ^{not} be appropriately adapted to transportation safeguards.
3. We question whether there has been enough work devoted to analyzing or defining the transportation requirements, to permit them to be expressed as performance statements at this time.
4. If the transportation requirements cannot be adequately expressed at this time, then it might be wise to conduct the rule upgrading effort separately - and lessen the chance of its holding back the fixed site effort.
5. See attached specific comments from Dick McCormick for further opinions

(FEB 24, 1977 MEMO)

6. We disagree with the entire philosophy that relies upon avoiding situations as a basic requirement. It is impractical to assume that we will ever have the necessary intelligence to predict where attempts would be made, and if we did, that it would be efficient enough to make the information available in a timely manner.

7. The approach does not address the capability for delaying the adversary until effective response is achieved.

8. To summarize:

- a) The concept has not been expressed completely.
- b) The present articulation is not logical.
- c) The narrative is not concise.

IE COMMENTS ON BASIC CAPABILITY FOUR NARRATIVE

1. The same general comment about the requirement to track the logical progression from general to specific statements of performance requirements, and then agree upon the acceptability of specific mechanisms (hardware, people and procedures) is needed before we can comment on the capability narratives. Tell me what (hardware, people, procedures) you think capability four requires, and then I'll tell you whether it is articulated efficiently, effectively, or completely.