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

February 16, 1977

MEMORANDUM FOR: L. J. Evans Jr., Chief, Requirements Analysis Branch, SG
FROM: O. S. Chambers, Safeguards Program Branch, OIE
SUBJECT: STATUS REPORT - UPGRADE RULE ACTIVITY

In response to your memorandum of February 10, 1977, subject as above, I have no comments concerning the completeness, organization, or explicitness of the three narratives. Attached as an enclosure are some general comments.

O S Chambers

O. S. Chambers
Safeguards Program Branch
Office of Inspection and Enforcement

Encl:
As stated above

cc: N. M. Haller
D. R. Chapell

GENERAL COMMENTS ON SAFEGUARDS RULE UP-GRADING

1. Option 3 (Performance requirements - with detailed system specifications) appears to be the most attractive option to IE.
2. It is not clear whether the minimum essential requirements are to supplement or replace the systems and functions statements that follow the narrative statements.
3. The minimum essential requirements are easier to inspect than the narrative statements with their subsystems and/or functional statements.
4. The security plans and/or license conditions must contain detailed commitments (hardware, procedures, numbers of people, etc.) which constitute expression of how the licensee is going to provide adequate safeguards.