

I 53



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

February 2, 1977

NOTE TO: Bud Evans  
FROM: Tom Thayer  
SUBJECT: SAFEGUARDS UPGRADE RULE

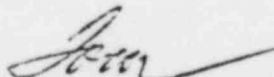
Your session on the rule yesterday set me to thinking about the characteristics that I might like to see or think appropriate in the new rule. After thinking about it for awhile, I came up with the following formulation which I am sending to you for your information and such use as you wish to make of it:

New Rule

A rule based on performance criteria:

- systematic and detailed enough to end the need for ratcheting after compliance is achieved,
- but stated in terms of functions, not specific solutions, so that licensees will have the flexibility to design their own security systems and feel accountable for them after NRC approval.

This will require that licensees and NRC develop methods of testing the achievement and maintenance of the functional capabilities.

  
Tom Thayer

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I 54

2/2/77

Beard -  
Bob called me early this AM before  
he wrote this. His prob was that  
he (they) don't want any reference to  
systems or subsystems - he doesn't think  
we should use detection systems,  
authorization control subsystems, etc. He  
thinks we should only use functional  
statements - but that they may go to  
greater depth than we envision now -  
probably an order or two lower. This would  
allow incorporation of the S/B specifics  
from Kaam, without calling out the systems,  
hardware or components.

*Beard*