



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

March 24, 1977

MEMORANDUM FOR: L. J. Evans, Chief, Requirements and Analyses Branch, NMSS

FROM: *HO/SJ* O. S. Chambers, Safeguards Program Branch, OIE

SUBJECT: BASIC CAPABILITY REGULATORY PROVISIONS AND COMPARISON  
OF BASIC CAPABILITIES WITH BASIC ESSENTIAL ELEMENTS  
(L. J. EVANS MEMO DTD MARCH 17, 1977)

In response to your request for comments on the material transmitted by the March 17, 1977 memorandum, subject as above, the following comments are offered:

1. To reduce the confusion caused by the variety of connotations given to the terms "program", "system", and "mechanism" they should be defined and used consistently throughout the rule. See Enclosure (1)
2. Each capability narrative requires a hierarchical statement of requirements which expresses an increasing amount of detail. All levels of detail should be published as part of the rule and should be associated with the applicable capability statement. See Enclosure (1) for a suggested hierarchy.
3. Enclosure (2) reflects an attempt to re-write the five basic capability narratives in a manner that satisfies my perception of how they should be stated to make them (1) complete, (2) organized logically, and (3) concise. The wording and structure reflect my first two comments. There is probably some redundancy and/or repetition, but I believe this may be desirable. Some statements may be superfluous, but are included for completeness. If my expression of the capabilities is adopted, it will be necessary to develop level C and D of the detail (essential functions, systems and mechanisms). This would involve shuffling some of the existing "subsystems functions" around, re-stating some, and adding others. The essential elements would have to be segregated under the applicable capability statement. The "Regulatory Provisions Overview" would require re-writing. These can be done later if the interest warrants.

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I like the attempt to express an overview, and to relate the provisions of the capability statements to the essential elements by displaying them on a matrix. If my approach is not acceptable or practical, I will devote more effort towards trying to correlate the disaggregation and the matrix, so that I can provide some assistance in assessing the completeness of the package.

*O S Chambers*

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

Encls:  
As Stated Above

cc: N. M. Haller  
J. G. Whiteaker  
D. R. Chapell  
R. McCormick

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CAPABILITY (1)

A. Permit only authorized persons, material and vehicles to enter certain areas at licensed facilities.

B. The licensee's safeguards program must include mechanisms to control access into PA's, VA's, and MAA's that are capable of (1) preventing, deterring or detecting (a) attempts by unauthorized personnel to gain access by stealth, force, or deceit or to introduce unauthorized material or vehicles or (2) preventing, deterring, or detecting attempts by authorized personnel to introduce by stealth, force, or deceit unauthorized material or vehicles, or (3) preventing, deterring, or detecting, attempts by stealth, force, or deceit by authorized personnel to enter VA's or MA's for which they are not authorized.

CAPABILITY (2)

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A. Permit only authorized activities and conditions to occur, only within those areas at licensed facilities for which they are authorized.

B. The licensee's safeguards program must include mechanisms that are capable of preventing, deterring, or detecting in a timely manner, within each PA, VA, or MAA (1) authorized activities or conditions in unauthorized areas or ~~in~~ unauthorized activities or conditions in authorized areas.

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CAPABILITY (3)

A. Permit only the location and movement of authorized SNM in those areas of licensed facilities where the location and movement is authorized.

B. The licensee's safeguards program must include mechanisms that are capable of preventing, deterring or detecting within each PA, VA, or MAA, in a timely manner, (1) unauthorized location or movement of authorized SNM or (2) authorized location or movement of unauthorized SNM.

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CAPABILITY (4)

A. Permit only the removal of authorized SNM in a confirmed manner from those areas at licensed facilities from which it is authorized to be<sup>c</sup> moved.

B. The licensee's safeguards program must include mechanism<sup>s</sup> capable of preventing, detecting, or deterring in a timely manner the removal by stealth, force, or deceit of (1) authorized or confirmed SNM from PA's, VA's, or MAA's in which the movement or location is not authorized or confirmed or (2) unauthorized or unconfirmed SNM from PA's, VA's MAA's in which its location or movement is authorized.

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CAPABILITY (5)

A. Provide timely and effective response to the detection of unauthorized activities at licensed facilities.

B. The licensee safeguards program will provide mechanisms capable of timely and accurate assessment and timely and effective response to detection of (1) authorized persons, materials, vehicles, conditions, or activities in unauthorized PA's, VA's, or MAA's, or (2) unauthorized persons, materials, vehicles, conditions, or activities, in authorized PA's, VA's, or MAA's.

Comments on "Basic Capability Regulatory Provisions and Comparison of Basic Capabilities with Basic Essential Elements" (Evans memo dtd March 17, 1977)

General Comments

1. The effort needs a hierarchy of terminology. We suggest the following:
  - o Programs - NRC Safeguards Licensing Program  
NRC Safeguards Inspection Program  
Licensees Safeguards Program
  - o Systems - Physical Security Systems  
Material Control Systems  
Inventory Verification Systems  
Accounting Systems
  - o Mechanisms-(Consisting of Hardware Components, Personnel and Procedures)
    - Preventive Mechanisms
    - Deterrent Mechanisms
    - Control Mechanisms
    - Response Mechanisms
    - Detection Mechanisms
    - Assessment Mechanisms
  
2. The effort needs a hierarchy of depth of detail in the capability statement most of which presently exists. We suggest the following:
  - A. General Statement of Performance Requirement
  - B. Statement of Focus and Scope
  - C. Statement of Essential Functions
  - D. Statement of Essential Systems and Mechanisms



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	DATE	PER CONVERSATION	
4	INITIALS	SEE ME	
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REMARKS  <p><i>Copy → Amy P 4/21 3:00 PM</i></p> <p><i>2:50 PM</i></p> <p><i>We need to be able to address</i></p> <p><i>each comment. They have</i></p> <p><i>some force a cut at this</i></p> <p><i>need. Be</i></p>			
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FROM (Name, office symbol or location)  R. G. Page		DATE 3/21/77	PHONE 74030