

STANDARD REVIEW PLAN OFFICE OF NUCLEAR REACTOR REGULATION

Section 13.6

INDUSTRIAL SECURITY

REVIEW RESPONSIBILITIES

Primary - Industrial Security and Emergency Planning Branch (ISEPB)

Secondary - None

I. AREAS OF REVIEW

At the preliminary safety analysis report (PSAR) stage, the review of this section covers plans for implementing security measures relating to (1) the screening of personnel employed to work at the proposed plant and (2) the layout of the plant and other design features and equipment arrangements intended to provide protection of vital equipment against acts of industrial sabotage.

At the final safety analysis report (FSAR) stage, the review involves the evaluation of the industrial security plan, which describes a comprehensive physical security program for the plant site. The review encompasses the physical security organization, access controls to the plant including physical barriers and means of detecting unauthorized intrusions, provisions for monitoring the status of vital equipment, selection and training of personnel for security purposes, communications systems for security, and arrangements with law enforcement authorities for assistance in responding to security threats. The implementation schedule for the physical security program is reviewed, including phases for multi-unit plants where applicable.

Specific information to be reviewed, referenced to applicable sections of ANSI N18.17-1973, include the following:

- Clear diagrams, to approximate scale, displaying the following:
 - a. Designated security areas of the plant site, including physical barriers.
 - b. The locations of alarm stations.
 - c. The locations of access control points to protected and to vital areas.
 - d. The location of parking lots relative to the clear areas adjacent to the physical barriers surrounding protected areas.
 - e. Special features of the terrain which may present special vulnerability problems.

USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission is policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard raview plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission. Office of Cuclear Reactor Regulation, Washington, D.C. 20856.

- f. The location of relevant law enforcement agencies and their geographical jurisdictions.
- 2. If the policy of the owner organization permits use of any part of the owner-controlled area by members of the general public, details of how the requirements of Section 3.2 will be met.
- 3. The response capabilities of local law enforcement agencies (Section 4.4.7), including estimates of the number of officers that can arrive at the plant site in the evant of a security threat, within five to fifteen minutes, fifteen to thirty minutes, and thirty minutes to one hour, after receipt of a call for assistance. (This response capability bears upon the adequacy of the size of the onsite guard force.)

II. ACCEPTANCE CRITERIA

At the PSAR stage, preliminary planning for industrial security should show how conformance to the applicable provisions of Regulatory Guide 1.17 are expected to be achieved, including:

- ANSI N18.17-1973, Section 2, "Definitions;" Section 3, "Designated Security Areas;" Section 4.3, "Employee Screening"; and Section 5, "Plant Design."
- Regulatory Guide 1.17, Revision 1, Section C.1.b, "Security Alarms," and Section C.3, "Protection of Vital Equipment."

This planning should include a commitment to design phase review for physical security and should show how this responsibility is to be implemented by the applicant.

At the FSAR stage, the applicant's security plan must conform to the requirements of 10 CFR 50.34(c), and to applicable requirements of 10 CFR Part 73. In addition, the provisions of Regulatory Guide 1.17, Revision 1, including the requirements and recommendations of ANSI N18.17-1973, Sections 3 and 4, establish the basis for an adequate security plan for the protection of nuclear power plants against industrial sabotage.

Specific acceptance criteria, including staff interpretations of some of the more general requirements of the ANSI Standard, are as follows: (Section references are to sections of ANSI N18.17-1973.)

- Surveillance of a protected area (Section 3.3.3) should be by a system which can provide for continuous monitoring of the entire perimeter of a protected area so as to allow response to be initiated at the time of penetration of a protected area.
- 2. Central alarm stations should be regarded as vital areas and meet the qualifications required thereof.

- For each plant, the onsite security force should include not less than two guards on each shift.
- 4. "Armed guards" means guards physically carrying firearms. Persons assigned to control access points to protected areas should not be armed if their work post is exterior to the protected area.
- 5. If search procedures of individuals and packages they may be carrying are not stipulated for all persons and hand-carried packages entering the protected area, then selection of individuals and hand-carried packages for search should be on the basis of a random process which is exercised each time an individual is about to enter the protected area.
- 6. Essential vehicles (Section 3.3.1) allowed access to protected areas include those designated strictly for security or emergency purposes, or vehicles not used primarily for conveyance of people that must be allowed within the protected area to serve a required function.
- 7. Picture badge identification should be used to satisfy Sections 3.3.2.1 and 3.3.2.2, with special color coding or symbols to satisfy 3.4.1, when inside vital areas.
- Casual visitor groups, such as tour groups do not constitute "persons having a need to enter such (vital) areas", Section 3.4.1.

Implementation of the physical security program should be accomplished one to two months before fuel loading. Security features required for new fuel in storage prior to loading of the first unit should be implemented as of the time fuel is onsite.

III. REVIEW PROCEDURES

At the PSAR stage, the review consists of a careful examination of the information submitted and comparison with the acceptance criteria set forth in II above. The general plant description in Chapter 1 and site-related information in Chapter 2 of the PSAR should be examined to determine if there are unique features that should be considered in establishing the physical protection program. It may be desirable at this stage to discuss the formulation of this program with the applicant.

At the FSAR stage, the physical security plan is reviewed to determine its conformance with the regulations, the information requirements of I above, and the acceptance criteria of II above. Applicable regulations, the position statements in Regulatory Guide 1.17, and the requirements and recommendations of ANSI N18.17-1973 are used as check lists for this review. The reviewer may also use appropriate Division 5 Regulatory Guides to the extent they are applicable to physical protection programs at nuclear power plants. Those having potential applicability are listed in the references. It is particularly important that the reviewer assure himself that all

items of vital equipment are contained within vital areas. A site visit by the reviewer may be necessary, during the construction phase, before the evaluation of the plan can be completed.

IV. EVALUATION FINDINGS

The evaluation finding at the PSAR stage should be substantially equivalent to the following statement:

"The applicant has provided a general description of plans for protecting the plant against potential acts of industrial sabotage. Provisions for the screening of employees at the plant, and for design phase review of plant layout and protection of vital equipment have been described and conform to Regulatory Guide 1.17. We conclude that the applicant's arrangements for protection of the plant against acts of industrial sabotage are satisfactory for this stage of the licensing process."

The evaluation finding at the FSAR stage should be substantially equivalent to the following statement:

"The applicant has submitted a comprehensive physical security plan for the protection of the plant against potential acts of industrial sabotage. This plan has been withheld from public disclosure pursuant to 10 CFR 2.790(d).

"This plan has been reviewed and found to contain features considered essential for such a program by the staff. In particular, it has been found to comply with the Commission's regulations including 10 CFR 50.34(c) and applicable sections of 10 CFR Part 73, and conforms to the positions set forth in Regulatory Guide 1.17."

V. REFERENCES

- Regulatory Guide 1.17, Revision 1, "Protection of Nuclear Power Plants Against Industrial Sabotage."
- 2. ANSI N18.17-1973, "Industrial Security for Nuclear Power Plants," American National Standards Institute (1973).
- Regulatory Guide 5.7, "Control of Personnel Access to Protected Areas, Vital Areas, and Material Access Areas."
- 4. Regulatory Guide 5.12, "General Use of Locks in the Protection and Control of Facilities and Special Nuclear Materials."
- 5. Regulatory Guide 5.20, "Training, Equipping, and Qualifying of Guards and Watchmen."
- 6. 10 CFR 50.34(c), "Physical Security Plan."
- 7. 10 CFR Part 73, "Physical Protection of Plants and Materials."

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