



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
Washington, D.C. 20555

INSPECTION AND ENFORCEMENT MANUAL

DDFMS

CHAPTER 2685

FUEL FACILITY SAFEGUARDS INSPECTION - OPERATIONS PHASE,
INSPECTION OF SNM AND IRRADIATED FUEL IN TRANSIT,
AND IMPORT-EXPORT LICENSES

2685-01 PURPOSE

This manual chapter defines the inspection program applicable to the subject licensees.

2685-02 OBJECTIVES

- 021 To identify specific inspection procedures which are to be used in the program.
- 022 To establish the frequencies of use for specific inspection procedures.

2685-03 DEFINITIONS

The symbols used in Exhibits regarding inspection frequencies are as follows:

- 031 Q = Quarterly
- 032 S = Semiannually
- 033 A = Annually
- 034 B = Biennially
- 035 T = Triennially
- 036 W = When required
- 037 X = Each inspection trip
- 038 E = When such inspection coincides with other inspection activity or as events and licensee performance dictate (no specified frequency)

2685-04 DISCUSSION

The procedures to be used and the associated inspection frequency are as follows:

041 Physical Protection*

- a. Exhibit 1, physical protection inspection program for Group 1 fuel facilities, operations phase.
- b. Exhibit 2, physical protection inspection program for fuel facilities with material of moderate strategic significance.
- c. Exhibit 3, physical protection inspection program for fuel facilities with material of low strategic significance.
- d. Exhibit 4, physical protection inspection program for irradiated fuel.
- e. Exhibit 5, physical protection inspection program for transportation of material of moderate and low strategic significance.
- f. Exhibit 6, physical protection inspection program for transportation of formula quantities of special nuclear material.
- g. Exhibit 7, physical protection inspection program for sites with personnel and information security programs.

042 Material Control and Accounting

Exhibit 8, material control and accounting inspection program for fuel facilities - operations phase.

2685-05 INTER-REGIONAL COORDINATION

On shipments which involve more than one Region, the Region receiving the advance notice, and/or subsequent changes, shall ensure that other regions involved in the shipment are provided copies of the notice. Each Region is

*The Part 8100 procedures dated December 31, 1981 and listed in Exhibits 1 through 7, define the physical protection inspection program. These procedures are scheduled for revision over the next two years to convert them to the new format defined in IE 0020.

responsible for monitoring the progress of the shipment** and for implementing the inspection requirements within its own region. Seperate inspection reports will be prepared addressing the inspection activity performed by each region involved in the shipment. For purposes of 766 data entry, the dummy docket number 99990080 will be used for all transportation inspections. The inspection report will be sequentially numbered by region. During the course of a shipment, the Movement Control Center (wherever located) may be inspected by any Region. When scheduling an inspection of the Movement Center, the other regions involved in the shipment shall be advised.

END

**The progress of the shipment can be monitored by telephone contact with the Movement Control Center; however, because the information must be protected against unauthorized disclosure, the shipment progress must be discussed in terms of advance or delay relative to the schedule provided in the advance notification.

PHYSICAL PROTECTION INSPECTION PROGRAM FOR GROUP 1
FUEL FACILITIES - OPERATIONS PHASE

PROCEDURE		FREQUENCY
NUMBER	TITLE	
30703	Entry/Exit Meeting	X
81210	Preinspection	S
81214	Site Orientation	S
81218	Security Plan and Implementing Procedures	S
81222	Security Organization - Management	S
81226	Security Organization - Personnel	S
81230	Security Organization - Response	S
81234	Security Program Audit	S
81238	Records and Reports	S
81242	Testing and Maintenance	S
81246	Locks, Keys, and Combinations	S
81252	Physical Barriers - PA	S
81254	Physical Barriers - VA, MAA, and CAA	S
81258	Security System Power Supply	S
81262	Lighting	S
81266	Assessment Aids	S
81270	Access Control - Personnel	S
81272	Access Control - Packages, Material, and SNM	S
81274	Entry/Exit Control - Vehicles	S
81278	Detection Aids - PA	S
81280	Detection Aids - VA, MAA, and CAA	S
81284	Alarm Stations	S
81288	Communications	S

PHYSICAL PROTECTION INSPECTION PROGRAM FOR GROUP 1
FUEL FACILITIES - OPERATIONS PHASE

PROCEDURE		
NUMBER	TITLE	FREQUENCY
81290	Post Inspection	S
81501	General Requirements for Personnel	S
81502	Additional Requirements for Power Reactor and Fixed Sites Personnel	S
81601	Safeguards Contingency Plan Implementation Review	S
81810	Protection of Safeguards Information	A
81815	Authorization for Access to National Security Information and Restricted Data	A
81820	Facility Approval for National Security Information and Restricted Data	A
81821	Safeguarding of National Security Information and Restricted Data - Storage and Use	A
92701	Followup on Inspector Identified Problem and Unresolved Issue	W
92702	Followup on Items of Noncompliance	W
92703	IE Bulletin/Circular/Immediate Action Letter	W
92713	Independent Inspection for Safeguards Items	W

PHYSICAL PROTECTION INSPECTION PROGRAM FOR FUEL FACILITIES
WITH MATERIAL OF MODERATE STRATEGIC SIGNIFICANCE (MSNM (CAT II))*

PROCEDURE		
NUMBER	TITLE	FREQUENCY
30703	Entry/Exit Meeting	X
81475	Preinspection	B
81480	General Requirements for MSNM	B
81490	Post Inspection	B
92701	Followup on Inspector Identified Problems and Unresolved Issues	W
92702	Followup on Items of Noncompliance	W
92703	IE Bulletin/Circular/Immediate Action Letter Followup	W
92713	Independent Inspection for Safeguards Items	W

* To be programmed for inspection over a two year cycle beginning
September 1, 1981.

PHYSICAL PROTECTION INSPECTION PROGRAM FOR FUEL FACILITIES
WITH MATERIAL OF LOW STRATEGIC SIGNIFICANCE (LSNM (CAT III))*

PROCEDURE		
NUMBER	TITLE	FREQUENCY
30703	Entry/Exit Meeting	X
81475	Preinspection	T
81485	General Requirements for LSNM	T
81490	Post Inspection	T
92701	Followup on Inspector Identified-Problem and Unresolved Issues	W
92702	Followup on Items of Noncompliances	W
92703	IE Bulletin/Circular/Immediate Action Letter	W
92713	Independent Inspection for Safeguards Items	W

* To be programmed for inspection over a three year cycle beginning
September 1, 1981.

PHYSICAL PROTECTION INSPECTION PROGRAM FOR
TRANSPORTATION OF IRRADIATED FUEL

PROCEDURE		
NUMBER	TITLE	FREQUENCY
30703	Entry/Exit Meetings	W
81305	Preinspection	E
81310	General Requirements	E
81315	Communications	E
81320	Post Inspection	E
81810	Protection of Safeguards Information	E
92701	Followup on Inspector-Identified Problems and Unresolved Issues	W
92702	Followup on Items of Noncompliance	W
92703	IE Bulletin/Circular/Immediate Action Letter	W
92713	Independent Inspection for Safeguards Items	W

PHYSICAL PROTECTION INSPECTION PROGRAM FOR TRANSPORTATION OF
MATERIAL OF MODERATE AND LOW STRATEGIC SIGNIFICANCE
(MSNM (CAT II)) AND (LSNM (CAT III))

PROCEDURE		
NUMBER	TITLE	FREQUENCY
30703	Entry/Exit Meeting	W
81330	Preinspection	E
81335	Shipment of MSNM	E
81340	Shipment of LSNM	E
81345	Post Inspection	E
92701	Followup on Inspector Identified Problems and Unresolved Issues	W
92702	Followup on Items of Noncompliance	W
92703	IE Bulletin/Circular/Immediate Action Letter	W
92713	Independent Inspection for Safeguards Items	W

PHYSICAL PROTECTION INSPECTION PROGRAM FOR TRANSPORTATION OF
FORMULA QUANTITIES OF SPECIAL NUCLEAR MATERIAL*

PROCEDURE		
NUMBER	TITLE	FREQUENCY
30703	Entry/Exit Meeting	W
81350	Preinspection	W
81354	General Performance Objectives	W
81357	Intransit Performance	W
81360	General Physical Protection System Requirements	W
81363	Security Organization and Audit	W
81366	Response and Contingency Plan/Procedures	W
81368	Access Control	W
81372	Testing and Maintenance	W
81375	Road Shipment Requirements	W
81376	Air Shipment Requirements	W
81377	Rail Shipment Requirements	W
81378	Sea Shipment Requirements	W
81388	Delivery and Receiving Requirements	W
81390	Post Inspection	W
81501	General Training and Qualification	W
81503	Additional Requirements for Transportation Personnel	W
81810	Authorizations for Access to National Security Information and Restricted Data	W
81820	Facility Approval for National Security Information and Restricted Data	W
81821	Safeguarding of National Security Information - Storage and Use	W
92701	Followup on Inspector-Identified Problems and Unresolved Issues	W

PHYSICAL PROTECTION INSPECTION PROGRAM FOR TRANSPORTATION OF
FORMULA QUANTITIES OF SPECIAL NUCLEAR MATERIAL*

PROCEDURE		
NUMBER	TITLE	FREQUENCY
92702	Followup on Items of Noncompliance	W
92703	IE Bulletin/Circular/Immediate Action Letter	W
92713	Independent Inspection of Safeguards Items	W

*Each shipment of formula quantities of SNM (import, export, and domestic) will be inspected at the point of origin. A random inspection will be made of the licensee's movement control center point of destination (or departure from the U.S.), and selected segments en route. Scheduled intermodal transfers will be monitored and all temporary storage areas will be inspected.

PHYSICAL PROTECTION INSPECTION PROGRAM FOR SITES WITH
PERSONNEL AND INFORMATION SECURITY PROGRAMS*

PROCEDURE		
NUMBER	TITLE	FREQUENCY
30703	Entry/Exit Meeting	X
81810	Protection of Safeguards Information	E
81815	Authorizations for Access to National Security Information and Restricted Data	A
81820	Facility Approval for NSI and RD	A
81821	Safeguarding of National Security Information - Storage and Use	A
92701	Followup on Inspector-Identified Problems and Unresolved Issues	W
92702	Followup on Items of Noncompliance	W
92703	IE Bulletin/Circular/Immediate Action Letter	W
92713	Independent Inspection of Safeguards Items	W

*Sites not otherwise addressed in Exhibits 1 through 6, e.g., corporate offices, intervenors, consultants, etc.

FUEL FACILITY SAFEGUARDS INSPECTION - OPERATIONS
 PHASE, INSPECTION OF SNM AND IRRADIATED FUEL
 IN TRANSIT, AND IMPORT-EXPORT LICENSE

2685, EXHIBIT 8

MATERIAL CONTROL AND ACCOUNTING INSPECTION PROGRAM FOR
 FUEL FACILITIES - OPERATIONS PHASE

PROCEDURE NUMBER	TITLE	FREQUENCY SAFEGUARDS GROUPS						VII & IX
		I	II	III	IV	V - VII		
30703	Management Meetings Entrance & Exit Interviews	X	X	X	X	X		X
85202	Facility Organization	A	A	A	A	E		-
85204	Facility Operation	A	A	A	A	E		-
85206	Measurement Controls	A	A	A	A	E		-
85208	Shipper/Receiver Verification	A	A	A	A	E		-
85210	Internal Control	A	A	A	A	E		-
85212	Physical Inventory	A	A	A	B	E		-
85213	Physical Inventory Verification	A	B	B	T	E		-
85214	ID & LEID	A	B	B	B	E		-
85216	Records and Reports	A	A	A	A	E		-
85218	Management of Materials Controls System	A	A	A	A	E		-
85300	Import/Export	-	-	-	-	-		W
92718	Inventory Difference Action Guidelines	W	W	W	-	-		-

SAFEGUARDS INSPECTION PROCEDURES
FOR FUEL FACILITIES - OPERATIONS PHASE

Procedure Number	Title	Inspection Frequency		
		Group I	Group III	Group V
30703B	Management Meetings - Entrance and Exit Interviews	X	X	X
81205B	Physical Protection - Security Plan	W	W	B
81210B	Physical Protection - Security Organization	S	W	B
81215B	Physical Protection - Physical Barriers	S	W	B
81220B	Physical Protection - Access Controls	4	W	B
81225B	Physical Protection - Keys, Locks, Combinations	S	W	B
81230B	Physical Protection - Detection Aids	4	W	B
81235B	Physical Protection - Response Controls	S	W	B
81240B	Physical Protection - Central Alarm and Communications System	4	W	B
81245B	Physical Protection - Testing and Maintenance	S	W	B
81250B	Physical Protection - SNM Protection	4	W	B
81255B	Physical Protection - Records and Reports	S	W	B
81260B	Physical Protection - Reports of Incidents	4	W	B
85202B	Material Control & Accounting (mfg) - Facility Organization	A	A	Q
85204B	Material Control & Accounting (mfg) - Facility Operation	A	A	Q
85206B	Material Control & Accounting (mfg) - Measurement Controls	A	A	NA

Issue Date: 10/1/79

Procedure Number	Title	Inspection Frequency		
		Group I	Group III	Group V
85208B	Material Control & Accounting (mfg) - Shipper/Receiver Verification	S	A	Q
85210B	Material Control & Accounting (mfg) - Storage and Internal Control	S	A	Q
85212B	Material Control & Accounting (mfg) - Physical Inventory	A	A	Q
85213B	Inventory Verification	A	A	Q
85214B	Material Control & Accounting (mfg) - MUF and Associated Limit of Error	S	A	Q
85216B	Material Control & Accounting (mfg) - Records and Reports	S	A	Q
85218B	Material Control & Accounting (mfg) - Mgmt of Mat'ls Control System	A	A	Q
92700B	Licensee Event Followup	W	W	W
92701B	Followup on Inspector Identified Problems & Unresolved Items	W	W	W
92702B	Followup on Items of Noncompliance/ Deviations	W	W	W
92703B	IE Bulletin/Immediate Action Letter Followup	W	W	W
92704B	Followup on Headquarters Requests	W	W	W
92705B	Followup on Regional Requests	W	W	W
92706B	Independent Inspection Effort	X	X	X
92713B	Independent Inspection Effort for Safeguards Inspectors	X	X	X
93700B	Inspector Dispatched to Site	W	W	W
93701B	Followup on Significant Event That Occurs During Inspection	W	W	W

SAFEGUARDS INSPECTION PROCEDURES
FOR FUEL FACILITIES - OPERATIONS PHASE

Procedure Number	Title	Inspection Frequency		
		Group I	Group III	Group V
30703B	Management Meetings - Entrance and Exit Interviews	X	X	X
81205B	Physical Protection - Security Plan	W	W	B
81210B	Physical Protection - Security Organization	S	W	B
81215B	Physical Protection - Physical Barriers	S	W	B
81220B	Physical Protection - Access Controls	S*	W	B
81225B	Physical Protection - Keys, Locks, Combinations	S	W	B
81230B	Physical Protection - Detection Aids	S*	W	B
81235B	Physical Protection - Response Controls	S	W	B
81240B	Physical Protection - Central Alarm and Communications System	S*	W	B
81245B	Physical Protection - Testing and Maintenance	S	W	B
81250B	Physical Protection - SNM Protection	S*	W	B
81255B	Physical Protection - Records and Reports	S	W	B
81260B	Physical Protection - Reports of Incidents	S*	W	B
85202B	Material Control & Accounting (mfg) - Facility Organization	A	A	Q
85204B	Material Control & Accounting (mfg) - Facility Operation	A	A	Q
85206B	Material Control & Accounting (mfg) - Measurement Controls	A	A	NA

2685E2-1

*To be restored to 4 when resources permit.

Procedure Number	Title	Inspection Frequency		
		Group I	Group III	Group V
85208B	Material Control & Accounting (mfg) - Shipper-Receiver Verification	S	A	Q
85210B	Material Control & Accounting (mfg) - Internal Control	S	A	Q
85211B	Material Control & Accounting (mfg) - Loss Mechanism Analysis	W,B	W,B	W,Q
85212B	Material Control & Accounting (mfg) - Physical Inventory	A	A	Q
85213B	Material Control & Accounting (mfg) - Inventory Verification	A	A	Q
85214B	Material Control & Accounting (mfg) - ID and Associated Limit of Error Verif.	S	A	Q
85215B	Material Control & Accounting (mfg) - ID and Associated Limit of Error Invest.	W	W	W
85216B	Material Control & Accounting (mfg) - Records and Reports	S	A	Q
85218B	Material Control & Accounting (mfg) - Mgmt. of Mat'ls Control System	A	A	Q
92700B	Licensee Event Followup	W	W	W
92701B	Followup on Inspector Identified Problems & Unresolved Items	W	W	W
92702B	Followup on Items of Noncompliance/ Deviations	W	W	W
92703B	IE Bulletin/Circular/Immediate Action Letter Followup	W	W	W
92704B	Followup on Headquarters Requests	W	W	W
92705B	Followup on Regional Requests	W	W	W
92706B	Independent Inspection Effort	X	X	X
92713B	Independent Inspection Effort for Safeguards Inspectors	X	X	X
93700B	Inspector Dispatched to Site	W	W	W
93701B	Followup on Significant Event	W	W	W