

NRC INSPECTION MANUAL

NSIR/DSO

INSPECTION PROCEDURE 81311

PHYSICAL SECURITY REQUIREMENTS FOR INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS

Effective Date: 10/06/2020

PROGRAM APPLICABILITY: IMC 2201C, 2202B, and 2690

81311-01 INSPECTION OBJECTIVES

01.01 Verify the licensee's physical protection program for an independent spent fuel storage installation (ISFSI) is implemented in accordance with the U.S. Nuclear Regulatory Commission (NRC)-approved security plans, regulatory requirements, and any other applicable requirements and orders.

01.02 Determine if the ISFSI physical protection program provides assurance, consistent with regulations in Title 10 of the *Code of Federal Regulations* (10 CFR 73), that activities involving spent nuclear fuel and high-level radioactive waste do not constitute an unreasonable risk to public health and safety.

81311-02 INSPECTION REQUIREMENTS AND GUIDANCE

This Inspection Procedure (IP) is applicable to ISFSIs licensed under 10 CFR Part 50, Part 52, and Part 72.

This IP is divided into two sections to address the two different types of licenses for the receipt, transfer, packaging, and possession of spent fuel and power reactor-related greater-than-class C (GTCC) waste. (10 CFR 72.2(a)(1))

Spent fuel is stored at an ISFSI located either at an operating power reactor site (i.e., inside the reactor's protected area (PA) or in the owner controlled area (OCA) in a separate PA), at a decommissioning power reactor site, or at an away-from-reactor (AFR) site using a dry cask storage system (DCSS). In lieu of a DCSS, a wet storage ISFSI may use a spent fuel pool (SFP) as part of a wet storage system to store the spent fuel.

Section 02.01 applies to a 10 CFR Part 50 or Part 52 licensee issued a general license for an ISFSI under 10 CFR 72.210 of Subpart K. This general license authorizes the use of a DCSS that has been previously approved in accordance with 10 CFR subpart 72 and described approved casks listing in 10 CFR 72.214.

Section 02.02 applies to any licensee issued a specific license for an ISFSI under 10 CFR 72.40. Under a specific license, any DCSS design can be used at any location. While a specific 10 CFR Part 72 license is independent from a co-located 10 CFR Part 50 reactor license, some structures, systems, and programs that are part of the licensing basis for the

reactor license may be shared and subject to different security requirements and or security orders.

In accordance with 10 CFR 73.51(d) for specific licenses, the Commission may, on a specific basis and upon request or on its own initiative, authorize other alternative measures for the protection of spent fuel and high-level radioactive waste subject to the requirements of 10 CFR 73.51 if after evaluation of the specific alternative measures, it finds reasonable assurance of compliance with the performance capabilities of the general performance objectives (10 CFR 73.51(b)). Likewise, in accordance with 10 CFR 73.55(r), "Alternative measures," for general licenses, the Commission may authorize a licensee to provide a measure for protection against radiological sabotage other than one required by 10 CFR 73.55. Exemptions under 10 CFR 73.5 and 10 CFR 72.7 can be granted by the Commission for both general and specific ISFSI licenses from the requirements in 10 CFR Part 73 and 10 CFR Part 72, respectively. Inspector(s) should review the licensee's plans that describe any alternative measures authorized and any exemptions granted by the Commission. The requirements of 10 CFR 73.21 and 73.22 apply to both general and specific licensees.

This inspection procedure establishes a method for inspecting an ISFSI. The primary application is for the inspection of a licensed ISFSI containing cask-stored spent fuel; however, most requirements are applicable to existing wet storage facilities. Prior to the first loading of spent fuel, general licensees must notify the NRC at least 90 days in advance in accordance with 10 CFR 72.212(b)(1). Selected portions of this procedure may be conducted as early as practical during construction and installation of security features to identify problems early before completion of the work may make their resolution difficult.

In preparing to complete this procedure, the inspector(s) should familiarize themselves with relevant documentation which may include, but is not limited to the licensee's security plans, site specific and/or corporate procedures. Specifically, the inspector(s) should apply additional attention to recent security plan changes that could be relevant to the inspection activity.

This inspection procedure applies to ISFSIs located inside an operating reactor PA for its initial inspection. For subsequent inspections, ISFSIs located inside an operating power reactor PA are subject to the security requirements of 10 CFR 73.55 and subject to the baseline security inspection within the reactor oversight program."

02.01 General License Requirements and Guidance.

Under 10 CFR 72.210, a general license is issued for the storage of spent fuel in an ISFSI at power reactor sites to persons authorized to possess or operate nuclear power reactors under 10 CFR Part 50 or Part 52. Through completion of the inspection activities for this IP, inspector(s) shall verify or determine that the licensee's physical protection program associated with this sample is designed and implemented to protect the spent fuel against the design basis threat (DBT) of radiological sabotage (10 CFR 72.212(b)(9)) and meet the requirements of any site specific security orders (e.g., interim compensatory measures, additional security measures).

- a. Verify the licensee protects the spent fuel against the DBT of radiological sabotage in accordance with the provisions and requirements as are set forth in the licensee's physical security plan pursuant to 10 CFR 73.55 and the conditions and exemptions under the provisions of 10 CFR 72.212(b)(9) and any site specific security orders.

Specific Guidance.

For this portion of the inspection, the inspector(s) should review the licensee's site security orders, security plan, training and qualification plan, safeguards contingency plan, protective strategy, and relevant implementing procedures and ensure that the protection of the ISFSI has been incorporated into the relevant documents. The inspector(s) should consider conducting a review of past security inspection reports for the ISFSI.

- b. Verify the licensee's ISFSI physical protection measures do not decrease the effectiveness of the physical protection program for the protection of vital equipment associated with the reactor and SFP required by 10 CFR 73.55.
(10 CFR 72.212(b)(9)(i))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review the licensee's security plans and implementing procedures and conduct interviews with security staff to ensure the ISFSI does not create any decrease in the security effectiveness of the designated vital areas (VAs).

- c. Verify the storage of spent fuel is within a PA, in accordance with 10 CFR 73.55(e), but need not be within a separate VA. Existing PAs may be expanded or new PAs added for the purpose of storage of spent fuel in accordance with the general license.
(10 CFR 72.212(b)(9)(ii))

Specific Guidance.

For this requirement the inspector(s) should review the licensee's analysis of their physical barriers (the specific use, type, function, and placement) to verify they meet the physical barrier requirements set forth in 10 CFR 73.55(e), specifically 73.55(e)(8), "Protected Area."

- d. Verify, at a minimum, personnel searches are performed by physical pat-down searches or by firearms and explosives detection equipment prior to admission to the PA. (10 CFR 73.55(h)(3)) and (10 CFR 72.212(b)(9)(iii))

Specific Guidance.

The inspector(s) should observe the licensee's personnel search process, implemented prior to the licensee granting personnel access to the PA, to verify that the search process is consistent with the licensee's implementing procedures; this guidance only applies to ISFSIs not in the same PA as the reactor.

- e. Verify that the PA assessment capability provides for the assessment of detected activity at the PA perimeter and the initiation of timely response.
(10 CFR 72.212(b)(9)(iv) and 10 CFR 73.55(i)(3))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review the licensee's security plans and associated implementing procedures to determine the specific methodology being implemented for assessment at the licensee's PA perimeter. Licensees may implement electronic technologies (e.g., closed circuit television) or direct surveillance conducted by a member of the licensee's security organization via patrol to satisfy this requirement; this guidance only applies to ISFSIs not in the same PA as the reactor.

- f. Verify the licensee protects safeguards information against unauthorized disclosure. (10 CFR 73.21 and 10 CFR 73.22)

Specific Guidance.

For the inspection of this requirement, the inspector(s) should verify that the licensee has developed a program to address the control, protection, and designation of safeguards information and that the implementing measures are documented in procedures.

02.02 Specific License Requirements and Guidance.

Requirements of 10 CFR 72 Subpart H and 10 CFR 73.51 are applicable for the physical protection of spent nuclear fuel (SNF) and power reactor-related GTCC waste stored under a specific ISFSI license issued pursuant to 10 CFR 72.40. Through verification of the inspection requirements within this IP, inspector(s) shall verify or determine that the licensee's physical protection program is designed and implemented to meet the general performance objective of 10 CFR 73.51(b); specific requirements under 10 CFR 72.180, 72.182, 72.184, and 72.186 of Subpart H; and site specific security orders (e.g., interim compensatory measures and additional security measures).

- a. Verify that SNF and power reactor-related GTCC waste is stored only within a PA. (10 CFR 73.51(b)(2)(i)) and (10 CFR 73.51(d)(1))

Specific Guidance.

To inspect this requirement the inspector(s) should observe a sample of a few physical barriers (surrounding the PA to which access is controlled) that the licensee has established and installed to verify the integrity of the barriers (ability to perform their intended function) and that the barriers are designed and constructed of materials in accordance with 10 CFR 73.2, "Definitions, Physical Barriers." For the PA perimeter barrier, the inspector(s) should take sample measurements of the barrier in any locations that appear to be less than the prescribed height and verify that any opening in the barrier is secured and monitored in accordance with the regulation. If building walls comprise a portion of the PA barrier, the inspector(s) should verify that the building (barrier) height and material is in accordance with 10 CFR 73.2, "Definitions, Physical Barriers."

- b. Verify that only individuals who are authorized to enter the PA are granted access to the PA. (10 CFR 73.51(b)(2)(ii))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review a sample (up to five) of the licensee's access authorization program records ensuring sufficient information on which to base an initial determination to grant a person unescorted access. The total accumulation of information within those records about the individual must be the basis for the access determination for each record sample.

- c. Verify that the licensee is in compliance with site specific security orders (e.g., additional security measures) for access authorization and fingerprinting; a log of authorized individuals is required by 10 CFR 73.51(d)(13)(i).

Specific Guidance.

No inspection guidance.

- d. Verify the licensee can detect and assess penetrations through the isolation zone (IZ). (10 CFR 73.51(d)(3))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should observe that all physical barriers that the licensee employs in support of its physical protection program and protective strategy are periodically inspected for integrity, and as applicable, are included in the licensee's maintenance program and subject to a periodic or cyclic maintenance schedule. If applicable, the inspector(s) should also review maintenance reports or logs. For testing of the perimeter intrusion detection system (IDS) the inspector(s) should verify, through the observation of testing conducted by members of the security organization, that the IDS is operating as intended and is capable of detecting penetrations through the IZ. The inspector(s) should observe that the licensee's perimeter assessment capabilities provides for timely assessment of intrusion alarms at the PA perimeter to ensure the initiation of a timely response.

If the licensee employs other intrusion detection devices in the OCA to detect unauthorized entry into PA, the inspectors should also observe testing of these devices to verify their functionality and that testing is conducted in accordance with licensee testing procedures. Each zone selected should be tested by the licensee's personnel using methods applicable to the type and configuration of the system being tested. System and device support beams or poles to which system sensors are anchored or affixed should also be included in the test. Each test approach should be performed until the alarm is received in the alarm station and is communicated to the test subject.

- e. Verify the licensee can provide timely communication to the designated response force whenever necessary. (10 CFR 73.51(b)(2)(iv))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should observe checks of communication equipment and verify that all equipment used for communicating with the designated response force or local law enforcement agency (LLEA) operates as designed.

- f. Verify that the physical protection system is designed to protect against loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose as described in 10 CFR 72.106(b). (10 CFR 73.51(b)(3))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review and verify that the licensee security plans have established measures to maintain an onsite physical protection program. Licensee security plans should discuss and identify members of the security organization and their duties and responsibilities. Additionally, the inspector(s) should verify that licensee implementing procedures ensure that all members of the security organization remain aware of their responsibilities and associated requirements. Lastly, inspector(s) will verify that all security systems and equipment are serviceable, in operation, and functioning properly.

- g. Verify that the licensee has retained a copy of the physical protection plan for a period of 3 years or until termination of the license. (10 CFR 73.51(c))

Specific Guidance.

No inspection guidance.

- h. Verify that the licensee complies with the provisions for physical protection systems, components, and procedures that meet the performance objectives of 10 CFR 73.51(b)(1). (10 CFR 73.51(b)(2) and 10 CFR 73.51(d))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review records and observe demonstrations. The licensee should be able to show that all security equipment that is identified as a component of the physical protection program has been tested to ensure the equipment remains operable, and maintains the capability to perform its intended function. Manufacturers' recommendations and specifications for equipment maintenance, testing (includes both routine/periodic and acceptance testing) and calibration are important elements in ensuring the security system maintains the capability to perform its intended function. The inspector(s) should verify that the licensee has incorporated and is adhering to manufacturers' recommendations and specifications to ensure the equipment can perform as designed.

The environment in which security equipment is employed is also an important factor in ensuring the capability of security equipment to perform as intended and should also be addressed in accordance with the manufacturers' recommendations and specifications.

For certain physical protection systems, sensitivity settings may have to be adjusted to accommodate certain environmental conditions (e.g., consistent wind, moisture or rain, fog, high voltage areas, radio frequency interference, etc.); however, these systems must maintain the capability to perform their intended function and meet the specific acceptance criteria that has been established in NRC regulations, regulatory guidance documents, and by the manufacturer of the systems.

- i. Verify the licensee provides illumination sufficient to permit adequate assessment of unauthorized penetrations of or activities within the PA. (10 CFR 73.51(d)(2))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review licensee security plans and implementing procedures to determine how the licensee provides the illumination necessary to satisfy IZ and PA assessment requirements. The inspector(s) may review licensee testing records to verify that testing of these assets during the hours of darkness had consistently enabled members of the security organization to observe and assess activities in IZs and external areas of the PA. If the licensee utilizes other technology in conjunction with its illumination to provide assessment capabilities during the hours of darkness, then the inspector(s) should verify that this equipment, when used in conjunction with existing illumination, provides the ability to conduct assessment of detected activities.

- j. Verify the licensee's perimeter of the PA allows for continual surveillance and is protected by an active intrusion alarm system that is capable of detecting penetrations through the IZ and that is monitored in a continually staffed primary alarm station and in one additional continually staffed location. (10 CFR 73.51(d)(3))

Specific Guidance.

The inspection of PA perimeter assessment devices should be conducted in conjunction with and during the perimeter IDS testing. For PA perimeter assessment equipment, the inspector(s) should verify through the observation of testing conducted by members of the security organization.

- k. Verify that the primary alarm station is located within the PA. It should have bullet-resisting walls, doors, ceiling and floor, and the interior of the station must not be visible from outside the PA. A timely means for assessment of alarms must also be provided. Regarding alarm monitoring, the redundant location need only provide a summary indication that an alarm has been generated. (10 CFR 73.51(d)(3))

Specific Guidance.

No inspection guidance.

- I. Verify the licensee's PA is monitored by daily random patrols. (10 CFR 73.51(d)(4); a log of all patrols is required by 73.51(d)(13)(iii)).

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review the security plan, implementing procedures, post orders, and logs of random security patrols of external and internal areas of the PA. These patrols should be conducted to detect the presence of unauthorized personnel, materials, vehicles, or activities and should include observations and verifications of physical protection program equipment and measures to ensure the integrity of the equipment and the proper implementation of security measures.

- m. Verify the licensee's security organization has written procedures that provides for sufficient personnel per shift to ensure the monitoring of detection systems and the conduct of surveillance, assessment, access control, and communications to assure adequate response. Members of the security organization must be trained, equipped, qualified, and requalified to perform assigned job duties in accordance with Appendix B to Part 73, sections I.A, (1)(a) and (b), B(1)(a), and the applicable portions of section II. (10 CFR 73.51(d)(5))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should verify that the licensee has screened, trained, and qualified all members of the security organization required to implement any part of the physical protection program. The inspector(s) should review a sample of employment screening records and/or training records that document each individual was screened, trained, and qualified to perform duties. Additionally, the inspector(s) should verify that the individuals have access to any and all equipment required to perform the duties associated with their position.

- n. Verify the licensee has a documented liaison with a designated response force or LLEA to permit a timely response to unauthorized penetration or activities. (10 CFR 73.51(d)(6))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review the documented liaison that the licensee has established with LLEA (local, State, Federal). The liaison should be in the form of a written document (i.e., letter, agreement, memorandum of understanding, etc.) that demonstrates that the licensee has requested the assistance of these agencies to support its security force with contingency events. The inspector(s) should verify the licensee's established law enforcement liaison to the extent documented in security plans and implementing procedures.

- o. Verify the licensee has a personnel identification system and a controlled lock system that limits access to only authorized individuals. (10 CFR 73.51(d)(7))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review the licensee's security plan and implementing procedures to identify security systems for which the licensee controls access. The security systems that should have access control measures associated with them could be areas such as alarm stations, access badging terminals, or secondary power supplies for alarm annunciation equipment and communications systems that are required by regulation or through the licensee's security plan and implementing procedures. Access controls implemented by the licensee may include equipment or systems that are maintained in a locked area with the specific keys or key cards for entry to the area being controlled. Additionally, passwords that provide access to the functions of a security computer system(s) or an access badging terminal should also be controlled.

- p. Verify the licensee has redundant communications capability between onsite security force members and designated response force or LLEA. (10 CFR 73.51(d)(8))

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review, through observation of testing, that the communication equipment operates as designed. The testing should include at least one communication check using each method of communication with LLEA. Backup communication devices, identified by the licensee in their security plans and implementing procedures, for communication with the security force should also be tested (i.e., radios, station intercom systems, etc.).

- q. Verify that all individuals, vehicles, and hand-carried packages entering the PA are checked for proper authorization and visually searched for explosives before entry in accordance with 10 CFR 73.51(d)(9).

Specific Guidance.

For the inspection of this requirement, the inspector(s) should ensure that the licensee is implementing its access control program for personnel, materials, and vehicles in accordance with the regulatory requirements and any other applicable NRC requirements. When inspecting this requirement, the inspector(s) should review the licensee's procedures to verify that the licensee has established methods for granting access to personnel, materials, and vehicles into the PA.

- r. Verify the licensee's written response procedures have been established and maintained for addressing unauthorized penetration of, or activities within, the PA. (10 CFR 73.51(d)(10))

Specific Guidance.

For inspection of this requirement, the inspector(s) should familiarize themselves with relevant documentation pertaining to response which may include, but is not limited to, the licensee's security plans, site specific and/or corporate implementing procedures, security post orders, and security program reviews and audits. The licensee's documentation should include how they comply with 10 CFR 73, Appendix C,

Section 5, "Implementing Procedures." Copies of superseded material must be retained for 3 years after each change or until termination of the license.

- s. Verify that all the licensee's detection systems and supporting subsystems include a tamper indicating system with line supervision. The system, as well as surveillance/assessment and illumination systems, must be maintained in operable condition. (10 CFR 73.51(d)(11))

Specific Guidance.

For this inspection requirement, the inspector(s) should review the design specifications and manufacturers' technical documentation for the perimeter IDS to determine that the system possesses the capability to indicate system component failure. The inspectors should verify that the licensee's testing procedures are in accordance with the manufacturers' specifications for testing this specific function of these systems to ensure the testing demonstrates acceptable system performance. The licensee's testing procedures should also be compared to objectives identified in the licensee's security plans to verify that the procedures do not reduce the effectiveness of the licensee's security plans. The inspectors should then physically verify, through observation of testing conducted by members of the security organization, that when system components are physically manipulated (in accordance with licensee testing procedures) the system provides an indication of tampering and/or component failure. Inspectors should inspect a sample of the licensee's perimeter intrusion detection devices to complete this inspection requirement. Timely compensatory measures must be taken after discovery of inoperability, to assure that the effectiveness of the security system is not reduced. (10 CFR 73.51(d)(11))

- t. Verify the licensee protects safeguards information against unauthorized disclosure. (10 CFR 73.21 and 10 CFR 73.22).

Specific Guidance.

For the inspection of this requirement, the inspectors should verify that the licensee has developed a program to address the control, protection, and designation of safeguards information and that the implementing measures are documented in procedures.

- u. Verify the licensee's physical protection program is reviewed once every 24 months by individuals independent of both physical protection program management and personnel who have direct responsibility for implementation of the physical protection program. The physical protection program review must include an evaluation of the effectiveness of the physical protection system and a verification of the liaison established with the designated response force or LLEA. (10 CFR 73.51(d)(12))

Specific Guidance.

No inspection guidance.

- v. Verify the licensee has retained the following documentation as a record for 3 years after the record is made or until termination of the license: a log of individuals granted access to the PA; screening records of members of the security organization; a log of all patrols; a record of each alarm received, identifying the type of alarm, location, date, and time when received, and disposition of the alarm; and the physical protection program review reports. (10 CFR 73.51(d)(13)(i)(ii)(iii)(iv) and (v))

Specific Guidance.

No inspection guidance.

- w. Verify, in accordance with any applicable security requirements and/or security orders that the licensee has implemented measure and process for vehicle control measures into PAs.

Specific Guidance.

For the inspection of this requirement, the inspector(s) should review site security plans and implementing procedures to verify the licensee has implemented vehicle control measures that may include the use of vehicle barriers, active and passive, along with any implementing procedures for processing vehicles into PAs.

- x. Verify, in accordance with any applicable security requirements and/or security orders, that the licensee has implemented an insider mitigation program.

Specific Guidance.

No inspection guidance.

- y. Verify that the licensee has developed offsite response coordination with LLEA as applicable to physical security requirements and/or security orders.

Specific Guidance.

For inspection of this requirement, the inspector(s) should familiarize themselves with relevant documentation pertaining to response which may include, but is not limited to, the licensee's security plans and any written agreements from offsite response agencies.

81311-03 PROCEDURE COMPLETION

This procedure is considered complete when all of the applicable inspection requirements listed in the procedure have been completed.

81311-04 RESOURCE ESTIMATE

The resource estimate for the completion of this procedure consists of 16 hours for the inspection of a co-located ISFSI, at a reactor, and 24 hours for the inspection of a not co-located

ISFSI, away from reactor. The frequency at which this inspection activity is to be conducted is triennially (once every 3 years).

81311-05 REFERENCES AND ASSOCIATED PUBLICATIONS

05.01 References.

RG 5.12, "General Use of Locks in the Protection and Control of Facilities and Special Nuclear Materials," Revision 1, October 2016. (ADAMS Accession No. ML15357A411)

RG 5.44, "Perimeter Intrusion Alarm Systems," Revision 3, October 1997. (ADAMS Accession No. ML003739217)

RG 5.75, "Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities," July 2009. (ADAMS Accession No. ML091690037)

RG 5.77, "Insider Mitigation Program," March 2009. (ADAMS Accession No. ML090721034)

Enforcement Guidance Memorandum 04-002, "Guidance for Handling Security-Related Enforcement Documents," dated May 21, 2004. (ADAMS Accession No. ML040750434)

05.02 Associated Publications.

Inspection Procedure (IP) 71130.06, "Protection of Safeguards Information," August 24, 2018. (ADAMS Accession No. ML17306A163)

IP 60858, "Away-From-Reactor ISFSI Inspection Guidance," May 03, 2007. (ADAMS Accession No. ML070430095)

Inspection Manual Chapter 2690, "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packaging's," November 09, 2009. (ADAMS Accession No. ML092730246)

NUREG-1140, "A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees, Final Report," January 1988. (ADAMS Accession No. ML062020791)

NUREG-1567, "Standard Review Plan for Spent Fuel Dry Storage Facilities," March 2000. (ADAMS Accession No. ML003686776)

PDC-TR-06-03, "U.S. Army Corps of Engineers Protective Design Center Technical Report. Vehicle Barrier Maintenance Guidance," February 24, 2007. (ADAMS Accession No. ML070590251)

RG 3.60, "Design of an Independent Spent Fuel Storage Installation (Dry Storage)," March 1997. (ADAMS Accession No. ML082681195)

END

Attachment 1 - Revision History for IP 81311,
Physical Security Requirements for Independent Spent Fuel Storage Installations

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non- Public Information)
N/A	ML103440331 06/02/11 CN 11-009	First Issuance. Completed 4 year search for commitments and found none.	N/A	N/A
N/A	ML16337A045 08/25/17 CN 17-016	This IP was amended to separate the requirements associated with the types and locations of ISFSI's. Portion markings were added to the inspection document. This is a major re-write.	N/A	ML16337A043
N/A	ML18288A186 02/08/19 CN 19-006	A periodic review of this document was conducted to ensure consistency with other associated NRC Manual Chapters and IPs. Staff also corrected a few technical modifications that were missing in this document. Upon completion of a SUNSI review, the staff concluded that this document can be decontrolled. The staff has removed all portion markings.	N/A	ML18288A187
N/A	ML20265A169 10/06/20 CN 20-048	This revision was to apply administrative changes reflecting this document's applicability by removing IMC 2515C and 2561B	N/A	ML20265A175