

**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Annette Vietti-Cook, Secretary

**FROM:** Commissioner Wright

**SUBJECT:** SECY-17-0095: REVIEW AND APPROVAL OF  
PROPOSED REVISION TO REGULATORY GUIDE 5.77  
“INSIDER MITIGATION PROGRAM”

Approved  Disapproved  Abstain  Not Participating

COMMENTS: Below  Attached  None

I appreciate the staff’s efforts to incorporate lessons learned from years of inspections, operating experience, and licensee interactions related to insider mitigation programs into Revision 1 of Regulatory Guide (RG) 5.77. The Committee to Review Generic Requirements endorsed this revision after determining that it did not impose a new staff position, any new requirements, or a backfit.<sup>1</sup> This revision also does not supersede Revision 0 of RG 5.77, which continues to be an acceptable approach to implementing an insider mitigation program. Therefore, I approve the staff’s recommendation to issue Revision 1 of RG 5.77. However, I agree with Chairman Hanson and former Commissioner Burns that before issuance, the document should be edited for consistency, accuracy, formatting, and a determination regarding which content should be marked “U” and “OUO/SRI.” The staff should provide this edited version to the Commission in a Commissioners Assistant’s note before issuance. Further, the staff should notify the Commission if it has any recommended substantive changes based on information and experience gained since this paper was submitted to the Commission.

David A. Wright  
Digitally signed by  
David A. Wright  
Date: 2021.07.06  
16:54:07 -04'00'

Entered in “STARS”  
Yes  No

**SIGNATURE**

July 06, 2021

**DATE**

<sup>1</sup> See ADAMS Accession No. ML17228A119 (non-public).