



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

August 30, 2021

Mr. Matt Feyrer, Site Manager  
Vallecitos Nuclear Center  
GE Hitachi Nuclear Energy Americas, LLC  
6705 Vallecitos Road  
Sunol, CA 94586

SUBJECT: VALLECITOS NUCLEAR FACILITY, NRC PHYSICAL SECURITY INSPECTION  
REPORT 07000754/2021401

Dear Mr. Freyrer:

On August 3, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the Vallecitos Nuclear Facility in Sunol, California. On August 3, 2021, the NRC inspector discussed the results of this inspection with Mr. B. Lockwood, Executive Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

One Severity Level IV violation is documented in this report. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the Director, Office of Nuclear Security and Incident Response.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in cursive script that reads "Ray Kellar".

Signed by Kellar, Ray  
on 08/30/21

Ray L. Kellar, P.E., Chief  
Plant Support Branch 1  
Division of Reactor Safety

Docket No. 070-00754

M. Feyrer

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License Nos. R-33 and SNM-960

Enclosure:  
As stated

cc w/ encl: Distribution via LISTSERV®

VALLECITOS NUCLEAR FACILITY, PHYSICAL SECURITY INSPECTION REPORT  
 07000754/2021401 – DATE August 30, 2021

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**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Number: 07000754

License Numbers: R-33 and SNM-960

Report Number: 07000754/2021401

Enterprise Identifier: I-2021-401-0129

Licensee: GE-Hitachi Nuclear Energy Americas LLC

Facility: Vallecitos Nuclear Center

Location: Sunol, California

Inspection Dates: May 10, 2021 to August 3, 2021

Inspectors: J. Buchanan, Physical Security Inspector

Approved By: Ray L. Kellar, P.E., Chief  
Plant Support Branch 1  
Division of Reactor Safety

## SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a physical security inspection at Vallecitos Nuclear Center, in accordance with the fuel cycle facility inspection program. This is the NRC's program for overseeing the safe operation of licensed fuel cycle facilities. Refer to <https://www.nrc.gov/materials/fuel-cycle-fac.html> for more information.

### List of Violations

Failure to Ensure Members of the Site Security Organization have been Qualified to Perform Assigned Security Duties.	
Significance	Report Section
Severity Level IV NCV 07000754/2021401-01 Open/Closed	81700.09
The inspector identified Severity Level IV violations of NRC License R-33 and NRC License SNM-960 for the licensee's failure to ensure members of the site security organization have been qualified to perform assigned security duties, including the ability to implement the requirements of written security procedures. Specifically, the licensee did not require facility personnel who performed testing of the intrusion detection system to be fully qualified prior to assigning these individuals the duties of implementing the requirements in the site security IDS testing procedure.	

### Additional Tracking Items

None.

## INSPECTION SCOPES

Unless otherwise noted, safeguards inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Inspections were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Publicly available IPs are located at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

## OTHER AREAS

### 81700.09 - Security Measures for Licensed Facilities

01.01 The inspector verified and assessed the licensee's implementation of its physical protection measures for personnel, materials, and vehicles in accordance with the regulatory requirements, NRC-approved security plans, and any applicable NRC Order(s).

01.02 The inspector verified that the licensee's physical protection measures provide adequate protection, including sufficient defense-in-depth, against theft or diversion, and against radiological sabotage.

The inspector verified the implementation of required portions of Confirmatory Order EA-14-144, dated April 22, 2015, Security Measures for Vallecitos Nuclear Center I through X.

### Access Authorization and Access to Special Nuclear Material (IP Section 02.01)

(a) The inspector verified that the licensee implements a program that ensures individuals who collect, process or have access to personal information used to make unescorted access authorization determinations are included in a trustworthy and reliability (T&R) program.

(b) The inspector verified that the licensee's implementation of its AA program provides assurance that individuals granted unescorted access and/or access to Special Nuclear Material (SNM) are trustworthy, reliable and do not constitute an unreasonable risk to public health and safety or the common defense and security.

### Observations and Findings

The licensee was adequately implementing its access authorization program and controlled access to SNM in accordance with regulatory requirements and commitments.

#### Access Control (IP Section 02.02)

- (a) The inspector verified that the licensee has established and implements measures to control access control (AC) devices and related AC devices to control access to protected locations within the facility.
- (b) The inspector verified that the licensee conducts vehicle searches at AC points in accordance with regulatory requirements, physical security plans and implementing procedures.
- (c) The inspector verified that the licensee's implementing procedures for vehicle searches describe the search process and areas of the vehicles to be searched, and the items which the search is intended to detect and prevent access as applicable.
- (d) The inspector verified that the licensee has established implementing procedures for visitor and vehicle escort and that those procedures, as implemented by the licensee, meet regulatory requirements.
- (e) The inspector verified that the licensee implements vehicle control measures in accordance with applicable requirements.
- (f) The inspector verified that the licensee maintains a record of all personnel to whom AC devices have been issued and implements a process to account for AC devices at least annually.

#### Observations and Findings

The licensee was adequately implementing access control security measures at all protected locations in accordance with regulatory requirements and commitments.

#### Identification of Facility Boundaries and Barriers (IP Section 02.03)

- (a) The inspector verified that the licensee has established and identified the location of its facility boundaries and physical barriers in its security plan and or implementing procedures.
- (b) The inspector verified that the radiological material that the licensee stores is located within the appropriate facility storage area and is maintained within the appropriate facility boundary.
- (c) The inspector verified that the licensee has installed all required physical barriers needed for the protection of radiological material.
- (d) The inspector verified that the physical barriers provide deterrence, delay or support AC and support the effective implementation of the protective strategy.

#### Observations and Findings

The licensee has adequately established the identification of facility boundaries and physical barriers needed for the protection of SNM in accordance with regulatory requirements and commitments.

#### Detection and Assessment (IP Section 02.04)

- (a) The inspector verified that the licensee implements continuous surveillance, observation and monitoring activities to detect and deter intruders and identify unauthorized activities.
- (b) The inspector verified that a single malicious act cannot remove the capabilities of both alarm stations to detect and assess alarms, initiate and coordinate an adequate response to alarms, and summon offsite assistance.
- (c) The inspector verified that the licensee ensures that each alarm station is continuously staffed with at least one trained and qualified alarm station operator who is not assigned other duties and responsibilities that would interfere with the ability to execute the functions described in applicable orders, regulatory requirements, the licensee's physical security plan and implementing procedures.
- (d) The inspector verified that appropriate illumination is being maintained and/or augmented by low-light technology in accordance with regulatory requirements to support detection, surveillance, alarm assessment and that this equipment is tested in accordance with regulations and licensee testing procedures.
- (e) The inspector verified (as applicable) that the CAS and SAS or AMS are constructed, located, protected and equipped such that the initiation and coordination of a response and communications capabilities can be performed in each alarm station.
- (f) The inspector verified, through observation of testing activities, that the CAS, SAS, or AMS maintain continuous communication capabilities with each other and other members of the on-duty security force, and that the testing of this function is conducted in accordance with regulations and licensee testing procedures.
- (g) The inspector verified, through observation of testing activities, that alarm devices are tamper-indicating and self-checking, including transmission lines to their respective annunciators and junction boxes and that these tests are conducted in accordance with regulations and licensee testing procedures. Additionally, the inspector verified that all equipment required to have tamper-indicating devices are properly equipped and installed; such that, detection is possible if tampering has occurred.
- (h) The inspector verified that the compensatory measures that the licensee is implementing to compensate for degraded or inoperable equipment, systems, and components meet all regulatory requirements.

#### Observations and Findings

The licensee was adequately implementing security measures for detection and assessment of unauthorized activities in accordance with regulatory requirements and commitments.



### Testing and Maintenance (IP Section 02.05)

- (a) The inspector verified that the operation of vehicle barrier systems are periodically checked through testing in accordance with licensee testing procedures.
- (b) The inspector verified that the licensee has developed testing and maintenance procedures for all security equipment identified as a component of the licensee's physical protection program in accordance with the security plans and implementing procedures.
- (c) The inspector verified that all security-related devices and equipment, to include any additional security equipment (e.g., intrusion detection equipment, physical barriers, etc.), that are used by the licensee to implement its physical protection program are maintained and tested in accordance with regulations, licensee testing and maintenance procedures and manufacturer specifications.
- (d) The inspector verified that the licensee's testing and evaluation procedures are consistent with the manufacturer's design characteristics, performance specifications and testing recommendations to ensure the equipment is being tested and evaluated to meet acceptance criteria.
- (e) The inspector verified that the licensee conducts evaluations and pre-operational testing of security-related measures, components and subsystems prior to integration into the security program to ensure the measures, components or subsystems are adequate and capable of performing their intended function in accordance with regulations.
- (f) The inspector verified that all communications equipment the licensee employs in support of its physical protective measures is being maintained in accordance with the licensee's maintenance procedures to ensure operability and reliability.
- (g) The inspector verified, through observation of testing activities that each alarm station has a means of maintaining continuous communication with local law enforcement authorities and that these functions are tested in accordance with regulations and licensee testing procedures.

### Observations and Findings

The licensee was adequately implementing its testing and maintenance in accordance with regulatory requirements and commitments.

### Training (IP Section 02.06)

- (a) The inspector verified that, before being permitted to perform any security-related duty or responsibility, personnel have been trained, equipped, and qualified to perform each assigned security-related job task or duty.
- (b) The inspector verified that each individual who is assigned duties and responsibilities identified in the NRC-approved security plans are trained and qualified in the use of all equipment or devices required to perform effectively all assigned tasks.
- (c) The inspector verified that the licensee has developed, implemented, and is maintaining a training program that is documented in procedures which describes how the licensee will

demonstrate and assess the effectiveness of its onsite physical protection program through simulation drills and tabletop exercises.

(d) The inspector verified that the licensee conducts simulation drills and tabletop exercises in accordance with NRC-approved security plans, the site's protective strategy, and implementing procedures.

(e) The inspector verified that each member of the security organization who is assigned duties and responsibilities required to implement the site's physical protection program participates in simulation drills and tabletop exercises.

(f) The inspector verified that findings, deficiencies, and failures identified in the training program to include simulation drills and tabletop exercises that adversely affect or decrease the effectiveness of the site's physical protection program are documented and that corrective actions are taken.

#### Observations and Findings

The inspector identified a Severity Level IV violation for the failure to ensure members of the site security organization have been qualified to perform assigned security duties. The details of this finding are located in the inspection results section of this report.

#### Contingency Response (IP Section 02.07)

(a) The inspector verified that the licensee has procedures for initiating a response to alarms to determine the existence and level of a threat in accordance with pre-established assessment methodologies and procedures.

(b) The inspector verified that the alarm station operators are knowledgeable of the final disposition of all alarms.

(c) The inspector verified that the licensee maintains a documented copy of the liaison agreement that it established with local law enforcement agencies.

#### Observations and Findings

The licensee has adequately developed its processes for contingency response to threats and response personnel have the requisite knowledge to address contingencies in accordance with regulatory requirements and commitments.

#### Safeguards Information (IP Section 02.08)

The inspector verified that the licensee has developed and implemented a Safeguards Information (SGI) Program which is maintained in accordance with NRC requirements.

#### Observations and Findings

The licensee has adequately developed processes for the implementation of a SGI program in accordance with regulatory requirements and commitments.

#### Information Protection System (IP Section 02.09)

The inspector verified that the licensee, certificate holder or applicant has established, implemented, and maintains an information protection system that includes the applicable measures for SGI as specified in 10 CFR 73.22 and subsequently published NRC Orders.

##### Observations and Findings

The licensee was adequately implementing its information protection system in accordance with regulatory requirements and commitments.

#### Access to Safeguards Information (IP Section 02.10)

(a) The inspector verified that only authorized personnel are provided access to SGI and that the licensee's process for authorizing access to SGI is based on the criteria specified in 10 CFR 73.22 (b).

(b) The inspector verified that personnel who must meet the exemption criteria of the category of individuals specified in 10 CFR 73.59 are exempt from the criminal history records check and background check requirements and have an established need to know.

##### Observations and Findings

The licensee was adequately controlling access to SGI in accordance with regulatory requirements and commitments.

#### Protection of Safeguards Information (IP Section 02.11)

(a) The inspector verified that the licensee stores unattended SGI in storage containers with locks that possess the characteristics identified in 10 CFR 73.2, Definitions, "Security Storage Containers" and "Locks."

(b) The inspector verified that the licensee implements measures for the control of SGI while in use or outside of a locked security storage container and that the measures require SGI to remain under the control of an individual who is authorized access to SGI.

##### Observations and Findings

The licensee was adequately implementing its processes for the protection of SGI which satisfied NRC regulatory requirements and commitments.

#### Processing, Reproducing, and Transmitting Safeguards Information (IP Section 02.12)

(a) The inspector verified that the licensee's stand-alone computers or computer systems used to process SGI are not connected to a network that is accessible by users not authorized access to SGI.

(b) The inspector verified that the licensee's computers used to process SGI that are not located within an approved security storage container have a removable information storage

medium that contains a bootable operating system (used to initialize the computer).

(c) The inspector verified that equipment used by the licensee to reproduce SGI does not allow unauthorized access to SGI by means of retained memory or network connectivity.

(d) The inspector verified that the licensee's processes for transporting SGI outside of an authorized place of use or storage include the following measures: (1) documents are packaged in two sealed envelopes or wrappers to conceal the presence of SGI; (2) the inner envelope or wrapper contains the name and address of the intended recipient and is marked on both sides, top, and bottom with the words "Safeguards Information"; and (3) the outer envelope or wrapper is opaque, addressed to the recipient, contains the address of sender, bearing no markings or indication of the SGI contained within 10 CFR 73.22(f)(1).

(e) The inspector verified that, except under emergency or extraordinary conditions, the licensee's processes for the electronic transmission of SGI outside of an authorized place of use or storage include the use of NRC-approved secure electronic devices, such as facsimiles or telephone devices or electronic mail that is encrypted by (Federal Information Processing Standard) 140-2 or later) a method that has been approved by the NRC.

#### Observations and Findings

The licensee was adequately implementing its processes for the processing, reproducing, and transmitting of SGI in accordance with regulatory requirements and commitments.

#### Marking of Safeguards Information (IP Section 02.13)

(a) The inspector verified that the licensee implements a process to ensure that documents or other matter containing SGI are conspicuously marked on the top and bottom of each page, i.e., "Safeguards Information."

(b) The inspector verified that the licensee's processes used to prepare documents containing SGI for delivery to the NRC include marking of transmittal letters or memoranda to indicate that attachments or enclosures contain SGI but that the transmittal document or other matter does not (i.e., "when separated from SGI attachment or enclosure, this document is decontrolled").

#### Observations and Findings

The licensee was adequately marking SGI in accordance with regulatory requirements and commitments.

#### Removal from Safeguards Information Category and Safeguards Information Destruction (IP Section 02.14)

(a) The inspector verified that the licensee implements a process for the removal of documents, or other matter from the SGI category when the information no longer meets the criteria of SGI.

(b) The inspector verified that the licensee has established a process for the destruction of

SGI and that its method of destruction precludes reconstruction by means available to the public at large.

Observations and Findings

The licensee was adequately implementing its processes for the removal from safeguards information category and safeguards information destruction in accordance with regulatory requirements and commitments.

Records (IP Section 02.15)

- (a) The inspector reviewed and evaluated licensee event reports and safeguards log entries for the previous 12 months, or since the last inspection, and follow up, if appropriate.
- (b) The inspector verified that the licensee is conducting security program reviews in accordance with applicable regulatory requirements. These reviews should include each program area within the physical protection program.
- (c) The inspector verified that the licensee reports safeguards events to the NRC Operations Center within the appropriate times as designated by regulatory requirements.

Observations and Findings

The licensee was adequately meeting NRC regulatory requirements for licensee event reports and safeguards log entries as well as conducting security program reviews in accordance with regulatory requirements and commitments.

**INSPECTION RESULTS**

Failure to Ensure Members of the Site Security Organization have been Qualified to Perform Assigned Security Duties.	
Severity	Report Section
Severity Level IV NCV 07000754/2021401-01 Open/Closed	81700.09
The inspector identified a Severity Level IV violation of NRC License R-33 and NRC License SNM-960 for the licensee's failure to ensure members of the site security organization have been qualified to perform assigned security duties, including the ability to implement the requirements of written security procedures. Specifically, the licensee did not require facility personnel who performed testing of the intrusion detection system to be fully qualified prior to assigning these individuals the duties of implementing the requirements in the site security IDS testing procedure.	
<u>Description:</u> On May 13, 2021, the inspector identified that the licensee did not have qualification records for individuals who performed the testing of the intrusion detection system equipment installed in the Hillside Storage Building as well as the Nuclear Test Reactor Building where special nuclear material is stored. While reviewing the physical security plan, implementing procedures, and a sample of training records, the inspector determined that personnel, not assigned to the security department, were routinely testing the IDS security equipment in accordance with the license's site security procedure titled, "Hillside Storage Building (HSB) Intrusion Detection System Testing," Revision 1.	

The licensee indicated that individuals routinely performing the testing of the IDS were not within the security organization and did not require the same qualification standards of security personnel. The inspector determined that since they were performing security-related job tasks or duties, there was a requirement for these individuals to be qualified and certified based on the level of proficiency necessary to adequately perform the tasks proscribed in the licensee's IDS testing procedure.

The physical security plan requires the testing of security equipment and security related systems and features that are documented in the plan. The IDS is described in the plan and the licensee's implementing procedure for testing the IDS was inspected to verify that the licensee had established and implemented a method to check periodically the operation of the system in accordance with the licensee's physical security plan and the manufacturers' specifications for this system to ensure testing for this system demonstrated acceptable system performance.

Corrective Actions: The licensee's immediate action was to further evaluate its training and qualification program to ensure that all facility personnel completing security related job tasks are qualified prior to being assigned any security related duties.

Corrective Action References: This violation was entered into the licensee's corrective action program as Condition Report 36966.

Analysis: The NRC Enforcement Policy, Section 2.2.2.d, states that SL-IV violations are those that are less serious, but more than a minor concern that resulted in no or relatively inappreciable potential security consequences (violations that created the potential of more than minor safety or security consequences).

Enforcement:

Severity: This violation is most closely related to SL-IV examples, found in Section 6.11.d, because the violation is not severe enough to meet the threshold for the next higher level.

Violation: NRC License No. R-33 for the General Electric Hitachi Vallecitos Nuclear Center (GEH-VNC) commits the licensee to Condition C(3) which states, in part, that the licensee shall maintain and fully implement all provisions of the Commission's approved physical security plan.

NRC License No. SMN 960 for GEH-VNC commits the license to Condition SG-1.1 which states, in part, that the licensee shall maintain and follow the physical security plan in accordance with Confirmatory Order EA-14-144, dated April 22, 2015.

The NRC's Confirmatory Order EA-14-144, "Security Measures for Vallecitos Nuclear Center," also requires the licensee to ensure that other members of the security organization (in addition to watchmen, CAS, SAS, and AMS operators) have been qualified to perform assigned security duties including the ability to implement the requirements of written security procedures.

The GEH-VNC Physical Security Plan for the Protection of Reactor Facilities under License R-33 and Facilities and Materials Licensed under NRC SNM-960, Revised on March 19 2019, Section 6.7, states, in part, that members of the site security organization are qualified to perform assigned security duties, including the ability to implement the requirements of the applicable written security procedures.

Contrary to the above, on May 13, 2021, the inspector identified a Severity Level IV violation of the licensee's physical security plan because the licensee failed to ensure that members of the site security organization were qualified to perform assigned security duties, including the ability to implement the requirements of the applicable written security procedures. Specifically, the licensee did not require facility personnel who performed testing of the intrusion detection system to be fully qualified prior to assigning these individuals the duties of implementing the requirements in the GEH-VNC Site Security Procedure "Hillside Storage Building Intrusion Detection System Testing," Chapter 9, Revision 1.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

## **EXIT MEETINGS AND DEBRIEFS**

The inspector verified no proprietary information was retained or documented in this report.

- On August 3, 2021, the inspector presented the physical security inspection results to Mr. B. Lockwood, Executive Vice President, and other members of the licensee staff.

## DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
81700.09	Corrective Action Documents	27833, 31316, 32146, 33169, 33271, 34759, 34760, 34761, 35498, and 36073.			
	Engineering Evaluations	GEH-VNC-SGI15-01	Barriers to Deter Truck Access to Hillside Storage Facility Building Roll-up Doors	0	
	Miscellaneous			Vallecitos Nuclear Center Revision 1 to Follow-up Information for NRC Inspection 2016-401	1
				Vallecitos Nuclear Center Revision 1 to Follow-up Information for NRC Inspection 2016-401	04/11/2016
				Physical Security Plan for the Protection of: Reactor Facilities Under License R-33 and Facilities and Materials Licensed Under NRC SNM-960 and California CA-0017-01	03/19/2019
				Memo, subject: Approval of Proposed Alternate Reviewing Officials for the General Electric Vallecitos Nuclear Center	10/24/2019
				Memo, subject: Request for NRC Authorization of Reviewing Official	05/02/2019
				Memorandum of Understanding, Request for Assistance Agreement	01/21/2021
				White Paper, subject: Function of Kiosk Arm Function of Kiosk Arm Design Analysis	
				White Paper, subject: Reviewing Official - NRC-approval	
				Training attendance record, Security Equipment Testing	03/01/2021
				Training attendance record, SSP 10 Alarm Testing	02/20/2019
				Security Training Lesson Plan, Escort Procedures	10/23/2019
				Attendance Record, MOU holders meet and greet with GEH VNC management	09/24/2019
				Training attendance record for LLEA K-9 training on site 300 area	09/04/2019
		Radiological Emergency Plan	01/01/2018		



Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		EA-14-144	Confirmatory Order EA-14-144, with Enclosure, Security Measures for Vallecitos Nuclear Center	04/22/2015
		NUREG 1959	Intrusion Detection Systems and Subsystems	03/01/2011
		NUREG-1959	Intrusion Detection Systems and Subsystems	1
		TAC-SGI15-001	Memo, subject: Vallecitos Nuclear Center Follow-up Information for Inspection 2015	11/16/2015
	Procedures	10	Hillside Storage Building Intrusion Detection System Alarm - Assessment & Response	0
		3-D	Authorization of Access to Safeguards Information & Security Areas	3
		9.12	Administrative Procedure	0
		Chapter 9	Hillside Storage Building Intrusion Detection System Testing	1
		CP-06-104	Protection of Safeguards Information	6
		CP-28-133	Protection of RAMQC	0.2
		K-5	Site Emergency Procedure, Breach of Security	4
		SEC-2.1	Security Training and Qualification	0
	Self-Assessments		Security Measures Self-Assessment	07/27/2020