

(U) Factors to Consider for Documentation of Criteria

(U) This table presents factors that the staff would consider when reviewing licensees' documentation for the three criteria for a site-specific security bounding time (SBT). The first column lists each of the criteria. The second column provides the current regulatory framework and then staff expectations for additional comprehensive discussion when documenting a site-specific SBT.

(U) This table in its entirety is public information.

Criterion	Site-Specific SBT
Criterion 1: Law Enforcement Response	<p>Current Regulatory Framework: Title 10 of the <i>Code of Federal Regulations</i> (10 CFR), paragraph 10 CFR 73.55(k)(9) and Appendix C, II.B.3.d</p> <p>Additional Discussion for SBT: Additional discussion, as necessary, to provide increased level of detail describing memoranda of understanding (MOUs) with local, State, or Federal law enforcement agencies that establish the response capabilities and commitments with any levels of law enforcement. Discussion of performance-based demonstrations of response capabilities by law enforcement to include any joint familiarization training, walkdowns, and table-tops. The staff finds the Nuclear Energy Institute (NEI) white paper provides an acceptable methodology for Criterion 1 and intends on documenting this in a future revision to Regulatory Guide (RG) 5.76, "Physical Protection Programs at Nuclear Power Reactors (Safeguards Information)." The time it will take the licensee to conduct additional actions (referenced in accompanying documents as AAT (additional action time)) to prevent radiological sabotage should also be added to this methodology in order to meet the staff's definition of a site-specific SBT. This may be part of the discussion under one or more of the other criteria. An example is to utilize the NEI proposal for calculating the sum of the four components noted in the white paper (notification time, team response time, mission planning time, and mission execution time) and the associated timelines, conduct practice drills involving law enforcement to establish times for mission planning and execution, and for the NRC to observe drills at least every 3 years.</p>

Criterion	Site-Specific SBT
<p>Criterion 2: Equipment relied on for Beyond Design Basis (BDB) event response strategies and Operator Actions</p>	<p>Current Regulatory Framework: 10 CFR 50.155, 10 CFR 73.55(f) and associated guidance in RG 5.81, Revision 1, “Target Set Identification and Development for Nuclear Power Reactors”</p> <p>Additional Discussion for SBT: Additional discussion, as necessary, on mitigation strategies to meet 10 CFR 50.155; description of location of applicable equipment; and the licensee’s ability to use the equipment during hostile action events, including timelines and associated training for having equipment in place and ready to use. Plans or procedures should discuss items such as: How will licensee personnel access the equipment if under fire? Who will be moving the equipment—will these personnel be onsite or have to respond from offsite? Discussion on, as necessary, additional operator actions that are documented in the associated target sets. Consider changes made to target sets as a result of the reasonable assurance of protection time and whether licensee resources can be focused on other targets and/or additional operator actions to support the SBT. The equipment relied on for BDB response that should be considered is limited to that equipment that is used for emergency operating procedures (EOPs). This may include equipment for the site-specific integrated use of FLEX support guidelines, station blackout and advanced accident mitigation equipment,¹ and some equipment for extensive damage mitigation guidelines. This should not include equipment specific to severe accident mitigation guidelines which are meant to manage accident sequences that progress beyond the capacity of the strategies contained in the EOPs.</p>
<p>Criterion 3: Licensee Recall</p>	<p>Current Regulatory Framework: Appendix C to 10 CFR Part 73, paragraph B(3)(e)(ii)</p> <p>Additional Discussion for SBT: Additional discussion, as necessary, on the process for recall of offsite personnel and documented items in plans or procedures such as: (1) the individuals who will be recalled; (2) the role those individuals will play in the licensee’s response organization; (3) how individuals will perform their roles (i.e., process for obtaining necessary response equipment and arriving at the necessary location); (4) methodology used for staff recall (all call, messaging or other means of communication); (5) estimated time for recalled personnel to be in position to perform necessary actions; (6) how the licensee will train individuals on and evaluate the recall process, including frequency (e.g., performance demonstrations or table top exercises). Consider any impacts of recalled personnel on the licensee’s response, to include the timelines for arrival and the tasks that must be completed to ensure protection against the design basis threat.</p>

¹ (U) Section B.5.b of Interim Compensatory Measure, February 2002.