

# Public Meeting to Discuss the NRC Staff's Consideration of Options for a Potential Rulemaking on Security for Special Nuclear Material

June 1, 2022

# Purpose of this Meeting

- Update stakeholders on the NRC staff's progress and receive comments on development of a Commission paper regarding enhanced security for special nuclear material (SNM)
- This is a Comment-Gathering meeting
- Attendees will have the opportunity to ask questions and/or make comments about the issues discussed; however, the NRC will not provide written responses to comments or questions raised

# Key Messages

- Staff is evaluating the pros and cons of multiple options to inform a recommendation to the Commission in response to Staff Requirements Memorandum (SRM)-SECY-19-0095, “Discontinuation of Rulemaking – Enhanced Security of Special Nuclear Material” ([ML21217A065](#))
- Staff has made some adjustments to the options
- For currently-licensed SNM, the existing regulatory framework provides adequate protection of public health and safety and the common defense and security

# Key Messages

- Staff took into account previous stakeholder comments on the 2015 regulatory basis document ([ML14321A007](#)) - made physical protection measures more performance-based and added clarity
- Staff intends to consider stakeholder comments in development of the Commission paper

# Background

- January 2015 – Final regulatory basis on Enhanced Security for SNM ([ML14321A007](#))
- April/June 2016 – Direction to suspend rulemaking activities
- August 2018 – Direction to staff to complete expedited, limited-scope rulemaking
- October 2019 – SECY-19-0095, “Discontinuation of Rulemaking – Enhanced Security of Special Nuclear Material” ([ML19157A084](#))
- August 2021 – SRM-SECY-19-0095 – Provide a notation vote paper with options on enhanced security of SNM and the potential regulatory, resource, and timing impacts of the options, per the Commission’s direction ([ML21217A065](#))

# Initial Options Under Consideration

Previous			Current	
Option 1	Status Quo	Major Topic 1 – Physical Protection Of <b>Unirradiated</b> SNM	Option 1	Status Quo
Option 2	Resume 2015 rulemaking		Option 2	Resume 2015 rulemaking
Option 2a	Resume 2015 rulemaking and include SNF		Option 3	Update regulations only for Cat II SNM
Option 3	Update regulations only for Cat II SNM		Option 4	Revise regulations for Cat I/II to be more performance-based; revise regulations for Cat III
Option 4	Revise regulations for Cat I/II to be more performance-based; revise regulations for Cat III	Major Topic 2 – Physical Protection Of <b>Irradiated</b> SNM	Option 5	Status Quo
Option 4a	Revise regulations for Cat I/II to be more performance-based and include SNF; revise regulations for Cat III		Option 6	Revise regulations on physical protection of irradiated SNM, including SNF and HLW
			Option 7	Revise regulations to include physical protection requirements for significant quantities of ANM
			Option 8	Revise regulations to increase “self-protecting” radiation threshold above 1 Gy/hr

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