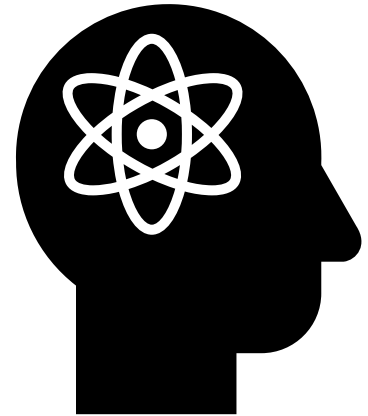


Break Out Session

Draft Security Measures

Staff Perspective

- Proposed changes are necessary to fulfill the NRC's statutory responsibility
- The proposed changes are consistent with activities that are already being implemented through security plan and procedures



TRTR Perspective

- Changes not consistent with the Atomic Energy Act of 1954, as amended
 - Minimum regulations
- Burdensome
- Impedes on research and teaching
- Status Quo works fine



Goal

- Coming to a better understanding of the proposed changes and their potential impact
- Balance the requirements to protect public health and safety with requirements to only apply minimum regulations



Security Measure Comparison

- 2015 Regulatory Basis
 - Not rule text, but is publicly available
 - Similar to CAL's and SECY for Moly production facilities
- Compare with existing Regulations, Orders, CAL's and License Conditions
- Identify what is already part of the site security plans and procedures



Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Protective Strategy	Immediately detect attempts to remove of SNM and provide sufficient delay through the use of barriers and/or armed responders to allow LLEA to promptly recover SNM	Promptly detect attempts to remove of SNM and notify local law enforcement agencies to allow recovery of SNM	Timely detect attempts to remove of SNM and notify LLEA to recovery SNM
Security Plan	Physical Security Plan Safeguards Contingency Plan Training & Qualification Plan	Physical Security Plan	Physical Security Plan

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Security Organization	Implement Program Management System	Implement Program Management System	Implement Program Management System
Physical Barrier	Vehicle Barrier System Isolation Zone Protected Area Controlled Access Area Locked Processes Vault-type room Hardened CAS	Controlled Access Area Locked Processes Vault-type room	Controlled Access Area

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Access Control	Protected Area & Controlled Access Area Access Portals Limit unescorted access Access Authorization Program (§73.57, §73.59, §73.61) Controlled Badge Program Escort Requirements	Controlled Access Area Access Portals Limit unescorted access Access Authorization Program Controlled Badge Program Escort Requirements	Controlled Access Area Access Portals Limit unescorted access Controlled Badge Program Escort Requirements All RTRs must comply with 73.57
Search Program	Protected Area – entry (contraband) & exit (SNM & shielding) Controlled Access Area – exit (SNM & shielding)	Controlled Access Area – entry (contraband) random exit (SNM & shielding)	None Included in CM/CAL's

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Detection and Assessment	Protected Area & Vault type room Intrusion Detection System with UPS Video Capture Central Alarm Station Secondary Alarm Station (on-site or off-site) Surveillance Program Periodic Patrols of outside areas Illumination	Controlled access area intrusion detection equipment or patrols Vault type room Intrusion Detection System with UPS Central Alarm Station Secondary Alarm Station (on-site or off-site) Surveillance Program Periodic Patrols of outside areas	Controlled access area monitored with either intrusion detection equipment or by periodic patrols to detect unauthorized penetrations or activities Surveillance Program Periodic Patrols of outside areas

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Communication	CAS/SAS two-way redundant communication with LLEA Continuous communication between CAS/SAS and on-site and off-site response force Non-portable equipment on UPS	CAS/SAS two-way redundant communication with LLEA Continuous communication between CAS and on-site and off-site response force Non-portable equipment on UPS	Two-way redundant communication with LLEA Continuous communication among security force Non-portable equipment on UPS
Response	Deadly Force Armed Security Officers LLEA Liaison Heightened Security	LLEA Liaison Heightened Security	LLEA Liaison Heightened Security

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Security Program Review	Biennially Management Review Issue identification and resolution program	Biennially Management Review Issue identification and resolution program	Biennially Management Review Issue identification and resolution program
Maintenance & Testing	Required	Required	Required

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Compensatory Measures	In PSP	In PSP	In PSP
Suspension of Security Measures	Allowed	Allowed	Allowed

Regulatory Basis 2015

	Category II Category I – Moderately Dilute	Category II – Moderately Dilute	Category III Category I – Highly Dilute
Records	Required	Required	Required
Alternative Measures	Allowed	Allowed	Allowed

“Self-protecting”

- Comments from non-power reactor on the Draft Regulatory Basis in 2014 indicated that licensees questioned the proposed elimination of the external dose-rate threshold
- Regulatory Basis 2015 noted staff evaluated what external dose-rate level would be appropriate
 - Staff revised its approach and proposed an external dose-rate threshold of 50 Gray/hour at one meter



Conclusion

- Was the goal accomplished?
 - Impact better understood
 - Not all items apply to NPUFs
- Parking Lot Items
- Questions

