

RESPONSE SHEET

TO: Carrie M. Safford, Secretary

FROM: Commissioner Caputo

SUBJECT: COMSECY-19-0006: Revised Security Inspection
Program Framework (Option 3) in Response to SRM-
SECY-17-0100

Approved X Disapproved Abstain Not Participating

Comments: Below Attached X None

Entered in STARS

Yes XXX

No



SIGNATURE

DATE

4-23-24

Commissioner Caputo's comments on COMSECY-19-0006, "Revised Security Inspection Program Framework (Option 3) in Response to SRM-SECY-17-0100"

In COMSECY-19-0006, the staff proposes changes to the NRC's Security Inspection Program Framework directed by the Commission in SRM-SECY-16-0073 and SRM-SECY-17-0100. COMSECY-19-0006 includes conforming revisions to two force-on-force (FOF) inspection procedures (IPs) and the FOF significance determination process (SDP) as required under SRM-COMSECY-16-0022, "Proposed Criteria for Reactor Oversight Process [ROP] Changes Requiring Commission Approval and Notification."¹

I agree with Chair Hanson that the staff's proposed changes would "allow inspectors to effectively evaluate the licensee's protective strategy, the performance of the licensee's adversary force, and the development and implementation of the licensee's exercise scenarios." I also agree with Chair Hanson that "eliminating duplicative inspection activities allows the staff and licensees to focus resources where they are most needed" — this is a guiding principle across the ROP.

I commend the staff for its development of these proposed changes and the underlying assessments that were necessary to show that the revised framework will continue to provide appropriate oversight of licensees' security programs. I note, however, that there have been intervening changes to the draft IPs and SDP provided with COMSECY-19-0006 as well as a reorganization of the Office of Nuclear Reactor Regulation that would affect the references within the IPs. I approve the staff's proposed framework for a revised inspection program as described in COMSECY-19-0006. Staff should update the Inspection Manual to implement this framework, taking into account intervening changes to the IPs and the SDP since the provision of the draft versions with COMSECY-19-0006

¹ In SRM-COMSECY-16-0022, the Commission approved an edited version of the staff's proposed criteria for changes to the Reactor Oversight Process (ROP) that would require Commission approval or notification. These criteria were subsequently incorporated in Management Directive 8.13, "Reactor Oversight Process," and remain in effect despite the Commission intervention in SRM-SECY-22-0087, directing the staff to not continue the implementation of changes in minimum samples and hours in the post-maintenance and surveillance testing inspection procedure without prior Commission approval despite those changes meeting the criteria of SRM-COMSECY-16-0022 for implementation without Commission approval.