

SECURITY

Effective Date: January 1, 2025

PROGRAM APPLICABILITY: IMCs 2200 A, 2562

81000-01 INSPECTION OBJECTIVE

- 01.01 The objective of this inspection procedure (IP) is to gather information to determine whether a licensee is meeting the objective of the construction security cornerstone, which is to provide assurance that construction activities are not adversely impacted because of fitness-for-duty issues, and that the licensee's security programs use a defense-in-depth approach and can protect against the design-basis threat of radiological sabotage from internal and external threats.
- 01.02 In meeting this objective, this procedure has provisions for the verification and assessment of licensee security construction and operational programs. Such verification is intended to support the Commission's determination, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 52.103(g), that the acceptance criteria in the combined license have been met.

81000-02 INSPECTION REQUIREMENTS AND GENERAL GUIDANCE

- 02.01 This inspection procedure (IP) was developed to ensure the operational program established for implementation at a plant licensed in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 or 10 CFR Part 52 meet all NRC requirements and objectives for operational program readiness. Note that this inspection is conducted as licensees activate their operational program in accordance with IMC 2200, Appendix A, "Security Construction Inspection Program," or IMC 2562, "Light-Water Reactor Inspection Program for Restart of Reactor Facilities Following Permanent Cessation of Power Operations." For reactors under construction, this IP is applicable to all power reactors under construction that are subject to oversight under the NRC's Construction Reactor Oversight Process (cROP). For restart of reactor facilities following termination of an operating license, this IP is applicable for transitioning from a decommissioned or extended shutdown reactor facility to an operational power reactor facility subject to the Reactor Oversight Process (ROP). Therefore, verification through observation of activities may not be possible. In such cases, the inspector(s) should review the appropriate licensee procedures and conduct inspections of all associated areas to ensure program compliance upon implementation.

Pursuant to Inspection Manual Chapter (IMC) 2200, "Security Inspection Program for Construction," and IMC 2562 "Light-Water Reactor Inspection Program for Restart of Reactor Facilities Following Permanent Cessation of Power Operation," construction

security inspection requirements are identified in and satisfied by the following inspectable area attachments to this IP:

- (a) Inspection of ITAAC-Related Security Structures, Systems, and Components (IP 65001.17)
- (b) Fitness-for-Duty Program (IP 71130.08)
- (c) Access Authorization (IP 81000.01)
- (d) Access Control (IP 81000.02)
- (e) Performance Evaluation Program (IP 81000.03)
- (f) Equipment Performance, Testing, and Maintenance (IP 81000.04)
- (g) Protective Strategy Evaluation (IP 81000.05)
- (h) Protection of Safeguards Information (IP 81000.06)
- (i) Security Training (IP 81000.07)
- (j) Fitness-for-Duty (FFD) Operational Program (IP 81000.08)
- (k) Cyber Security Inspection for Construction (IP 81000.09)
- (l) Security Organization, Management Effectiveness, Program Reviews and Audits (IP 81000.10)
- (m) Material Control and Accounting (MC&A) (IP 81000.11)
- (n) Review of New Reactor Target Sets (IP 81000.14)
- (o) Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance (IP 81431)
- (p) Fitness-for-Duty Program for Construction (IP 81504)
- (q) Protection of Safeguards Information for Construction (IP 81505)
- (r) Radioactive Waste Treatment, and Effluent and Environmental Monitoring (IP 84750)
- (s) Material Control and Accounting at Decommissioning Reactors (IP 85103)
- (t) Solid Radioactive Waste Management and Transportation of Radioactive Materials (IP 86750)
- (u) 10 CFR Part 37 Materials Security Programs (IP 87137)

The NRC developed guidance to give the inspector(s) an acceptable approach to verifying inspection requirements. Inspector(s) should not view the recommended actions contained in the guidance section as mandatory but rather as an acceptable method for evaluating licensee programs that provides high assurance that the licensees are meeting NRC regulatory requirements within the security program area undergoing inspection. Should questions arise about procedural requirements or guidance, inspectors should consult with regional management or the appropriate Office of Nuclear Security and Incident Response representative for clarification.

02.02 These requirements represent the minimum inspection activity to be conducted at each reactor site at the frequencies shown in each inspectable area attachment.

- a. The inspection requirements in Section 02 of the listed attachments describe the necessary actions to be completed in order to achieve the inspection objective(s) stated in Section 01 of the listed attachments. Inspection requirements may include, but are not limited to, inspecting systems, components, records, procedures, programs, and operations.
- b. The sample size stated in Section 04 of the listed attachments is the sum of the inspection requirements in Section 02 of the listed attachments. The sample size has been determined to meet the inspection objective(s) and the general performance

objective of the security construction cornerstone. Inspection of all inspection requirements identified within each inspectable area attachment demonstrates the completion of the respective IP.

02.03 Corrective Action Program Effectiveness Reviews. A fundamental goal of the U.S. Nuclear Regulatory Commission's (NRC's) oversight of new construction activities is to establish confidence that applicants/licensees (and their contractors) are detecting and correcting problems in a manner that provides assurance that construction activities are not adversely impacted because of fitness-for-duty issues, and that the licensee's security programs use a defense-in-depth approach and can protect against the design-basis threat of radiological sabotage from internal and external threats. A key premise of the NRC's oversight is that weaknesses in an applicant's/licensee's corrective action program (CAP) will manifest themselves as performance issues that will be identified through the NRC inspection program. Therefore, each security construction IP includes a CAP sample for verifying the effectiveness of a licensee's CAP related to the inspectable area. In addition to the CAP samples, construction resident inspectors screen CAP issues frequently by following up on selected NRC-identified issues and performing periodic team inspections in accordance with IP 35007, "Quality Assurance Program Implementation During Construction and Pre-Construction Activities." For these periodic team inspections, the inspection team may or may not include a Security Specialist as a full-time or part-time team member.

81000-03 INSPECTION RESOURCES

Each inspectable area attachment contains estimates of needed inspection resources.

END

Attachment 1: Revision History for 81000

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession No. (Pre-Decisional, Non-Public Information)
N/A	ML11192A029 08/27/13 CN 13-018	Inspection procedure issued to support IMC 2200. Researched commitments for the last 4 years, none found.	N/A	N/A
N/A	ML18345A358 01/29/19 CN 19-004	Minor administrative changes to update inspection procedure names and numbers. Upon completion of a SUNSI review, the staff concluded that this IMC should be decontrolled. Consistent with the staff's SUNSI determination, this IMC is now publicly available.	N/A	N/A
N/A	ML24162A225 10/29/24 CN 24-033	Administrative additions made to update inspection procedure in support of Palisades and other NPP restart. Specifically, minor revisions were made to the IP as a result of the review, editorial changes to adhere to IMC 0040, as well as the addition of IMC 2562 to the program applicability.	N/A	ML24162A226