



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 30, 2025

Susan H. Perkins  
Senior Director, Security & Incident Preparedness  
Nuclear Energy Institute  
1201 F Street, NW, Suite 1100  
Washington, DC 20004

SUBJECT: APPROVAL FOR USE OF NUCLEAR ENERGY INSTITUTE 03-12, "TEMPLATE FOR SECURITY PLAN, TRAINING AND QUALIFICATION PLAN, SAFEGUARDS CONTINGENCY PLAN [AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION SECURITY PROGRAM]," REVISION 8, DATED MAY 2025

Dear Susan H. Perkins:

On April 12, 2024, William Gross submitted a letter (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML24103A160](#)) on behalf of the Nuclear Energy Institute (NEI) to the U.S. Nuclear Regulatory Commission (NRC) containing the proposed Revision 8 of NEI 03-12, "Template for Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]," for NRC review and endorsement.

Via closed noticed meetings on September 5, 2024 ([ML24214A249](#)), and February 13, 2025 ([ML25031A004](#)), and a follow-up teleconference discussion for clarification on April 23, 2025 (not noticed), the NRC staff provided comments on NEI 03-12, Revision 8, and discussed resolution of NRC concerns. As a result, on May 15, 2025, NEI submitted an updated draft for NRC review.

Additionally, during a public meeting with the NRC held on December 12, 2024, NEI presented a proposed methodology for identification and documentation of supplemental security equipment for surveillance, observation, and monitoring of the owner controlled area (OCA), in accordance with 10 CFR 73.55(i)(5)(ii). The NRC initially assessed this proposal separately from the NRC review of NEI 03-12, Revision 8. However, NEI subsequently incorporated the proposed methodology and documentation guidance into associated sections of NEI 03-12, Revision 8. Accordingly, the NRC's review of NEI 03-12, Revision 8, included a determination regarding the acceptability of the proposed methodology for OCA surveillance, observation, and monitoring as one potential method available at the licensee's discretion for meeting the requirement in 73.55(i)(5)(ii).

For licensees that implement the NEI 03-12, Revision 8, guidance for OCA surveillance, observation, and monitoring, licensee-identified equipment will be subject to NRC inspection to verify that configuration, maintenance, and testing is consistent with the description in the associated section of the licensee's site-specific physical security plan (i.e., the section of the site-specific security plan that aligns with section 10.5.1 of the NEI 03-12, Revision 8, template). The NRC's consideration of a licensee's use of the equipment during licensee-conducted and

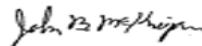
NRC-evaluated force-on-force exercises will be consistent with the NRC's current treatment of OCA surveillance, observation, and monitoring equipment.

The NRC has completed its review of NEI 03-12, Revision 8, dated May 15, 2025, and concluded that all comments have been adequately addressed. Therefore, the NRC approves NEI 03-12, Revision 8, for use by NRC licensees. At this time, licensees are not obligated to implement NEI 03-12, Revision 8; Revision 7 and Revision 7.1 remain acceptable for continued use. Licensees desiring to make changes to their security plans to conform to NEI 03-12, Revision 8, shall evaluate the changes in accordance with 10 CFR 50.54(p) to determine whether prior Commission approval is needed.

The NRC plans to formally endorse NEI 03-12, Revision 8, in its next update to Regulatory Guide 5.76, "Physical Protection Programs at Nuclear Power Reactors" (non-public; Safeguards Information).

If you have any concerns or questions, please contact Mr. Justin Vazquez of my staff at (301) 415-0530, or via email at [Justin.Vazquez@nrc.gov](mailto:Justin.Vazquez@nrc.gov).

Sincerely,



Signed by McKirgan, John  
on 07/30/25

John McKirgan, Director  
Division of Physical and Cyber Security Policy  
Office of Nuclear Security and Incident Response.

NEI 03-12 Acceptance Letter DATE July 30, 2025

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