



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

July 17, 2025

MEMORANDUM TO: Charity Pantalo, Acting Chief
Security Oversight and Support Branch
Division of Security Operations
Office of Nuclear Security and Incident Response

FROM: Maury Brooks, Security Specialist
Security Oversight and Support Branch
Division of Security Operations
Office of Nuclear Security and Incident Response

Maury Brooks

Signed by Brooks, Maury
on 07/17/25

SUBJECT: SUMMARY OF THE BASELINE SECURITY SIGNIFICANCE
DETERMINATION PROCESS PUBLIC MEETING HELD ON
JUNE 26, 2025

Meeting Identifier: 244594488288

Date of Meeting: June 26, 2025

Type of Meeting: Open Discussion Meeting

Purpose of Meeting: On June 26, 2025, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a hybrid public meeting with various internal and external public stakeholders to provide an update on the NRC's progress on the effort to evaluate its Baseline Security Significance Determination Process (BSSDP) and determine whether there are any aspects of the BSSDP that can be improved or further risk-informed.

General Details: The meeting was attended by approximately 14 NRC personnel and external stakeholders. Representatives from the Nuclear Energy Institute (NEI), STARS Alliance, Idaho National Laboratory, and the Union of Concerned Scientists (UCS) were among the participants that identified themselves and provided comments or questions. The meeting started at 9:00am EDT and completed by 10:30am EDT, as scheduled. The meeting was held virtually over the Microsoft Teams application.

Summary of Presentation: The NRC provided a formal presentation for the meeting discussion. This presentation can be located at ML24191A170. No other participants provided a formal presentation.

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NRC staff provided details on the proposed enhancements to the BSSDP, which provides a more risk-informed, performance-based assessment approach. Specifically, three noteworthy changes are being suggested as changes to the existing process:

1. Likelihood of Exploitability vs. Impact on the Physical Protection Program – This concept parallels the risk triplet used in the NRC’s Significance Determination Process (SDP), but applies qualitative criteria to assess likelihood and consequence, given the challenges of assigning quantitative (i.e., probabilistic) values to the security cornerstone: what can go wrong, how likely it is, and what the consequences are.
2. Human Performance vs. Programmatic Performance Issues – Human Performance refers to cases where the performance deficiency (PD) would not have occurred if licensee staff had properly followed existing procedures, training, and programs. In contrast, Programmatic issues are embedded within the licensee’s procedures, training, or processes. These deficiencies are considered predictable and can be identified through observation of licensee activities or by reviewing procedures, records, or documentation accessible to a passive insider.
3. Reduction in Subjectivity and Complexity – To address existing subjectivity, the staff developed a revised BSSDP framework that removes the Significance Screen (Figure 4) and the BSSDP Worksheet (Figures 7–11). These have been replaced with a new assessment matrix and flow chart that incorporate specific criteria to better risk-inform the determination process. Complexity is also reduced by eliminating the need to evaluate physical security findings using multiple figures that inspectors previously found to be overly complex and open to interpretation.
4. The staff’s revision will also include considerations for leveraging IMC 0609 Appendix M, “Significance Determination Process Using Qualitative Criteria.” Currently, IMC 0609 Appendix M serves as an alternative to existing quantitative SDP tools to determine the security significance of inspection findings that are difficult to estimate using available quantitative risk tools and methods.
5. Lastly, staff recognized the necessity for enhanced Reactor Security Inspector Technical Proficiency, therefore, a Training Needs Analysis has been recommended upon approval of this new process.

Industry Input/Comments

After the initial introduction and presentation by the NRC, various external stakeholders shared their thoughts regarding the working group’s proposed recommendation. The following list is a high-level summary of the comments and suggestions offered by external stakeholders and are not verbatim.

NEI Comment 1:

Subjectivity in the Significance Determination Process: While we understand the importance of flexibility in security evaluations, the Impact to the Physical Protection Program (IPPP) criteria as proposed introduce a level of subjectivity that may hinder consistency in implementation and oversight.

NEI Comment 2:

Treatment of Human Performance Issues: The draft framework's placement of human performance deficiencies (HPDs) in Tier II and Tier III significance levels suggests a potential overstatement of their exploitability. As previously conveyed in NEI's February 2025 presentation, human performance deficiencies are inherently less exploitable due to their unpredictable nature. We believe it is inappropriate to assess HPDs on the same significance tier as repeatable programmatic issues.

NEI Comment 3:

Example on Slide 16 of June 26, 2025, Presentation: This example, which is one of the few we have had the opportunity to review, appears to illustrate a shift in significance from previous screenings. Despite NRC staff's statement that scenarios dating back to 2020 screens are similarly or less significant under the revised framework, this example appears to indicate an increase in assessed significance. Such inconsistencies reinforce our concern about subjective interpretation and application of new likelihood level criteria. Moreover, since the full proposed revision of the BSSDP has not been made available to stakeholders, our concern extends to the possibility that other examples may similarly reflect a misalignment with risk significance.

NEI Comment 4:

Contraband-Related Findings: The revised proposal includes an exception under Tier I criteria for events involving contraband entering the Protected Area (PA). Historically, such events have been treated as low to moderate significance; however, we believe that a more risk-informed perspective is warranted. In many instances, the actual impact is limited due to robust defense-in-depth measures and the absence of malicious intent particularly when the individuals involved are under licensee observation programs. We request the NRC to re-evaluate the true risk impact of contraband-related events, especially those caused by human performance and under licensee observation programs. Furthermore, an exception should be considered when the event involves security officers, who are authorized to be armed once they assume their duties.

Next Steps

In response to the above-mentioned feedback, a follow-up public meeting has been scheduled for July 14, 2025. Specifically, this meeting will respond to comments provided to the NRC by industry stakeholders related to the staff's recommendations for enhancing the BSSDP.

Conclusion

At the end of the meeting, NRC management gave closing remarks. No regulatory decisions were made as a result of this meeting.

Attachments:

- List of Attendees

LIST OF ATTENDEES
BASELINE SECURITY SIGNIFICANCE DETERMINATION PUBLIC MEETING
June 26, 2025 – 9:00 AM to 10:30 AM

Name	Organization	Name	Organization
Michael Whitlock	NEI	Brian Yip	NRC
Jay Bodnar	NEI	Desiree Davis	NRC
Edwin Lyman	UCS	Jeff Bream	NRC
John Cherubini	STARS Alliance	Maury Brooks	NRC
		Russel Felts	NRC
		Tammy Bloomer	NRC
		Karen Danoff	NRC
		Jannette Worosilo	NRC
		Keven Maloney	NRC
		Cliff Roundtree	NRC

Summary Of The Baseline Security Significance Determination Process Public Meeting Held On June 26,
2025 DATE July 17, 2025

DISTRIBUTION:

JBream, NSIR/DSO/SOSB

TInverso, NSIR/DSO

JClark, NSIR/DSO/SPEB/ETA

BBickett, R-I/DRP/PB3

JWorosilo, R-II/DORS/PSB

MZiolkowski, R-III/DRS/PSB

JRollins, NSIR/DPCP/RPPB

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DATE	Jul 17, 2025	Jul 17, 2025	Jul 17, 2025	

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