

NOTATION VOTE

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER MERRIFIELD

SUBJECT: **SECY-99-241 - RULEMAKING PLAN, PHYSICAL SECURITY
REQUIREMENTS FOR EXERCISING POWER REACTOR
LICENSEES' CAPABILITY TO RESPOND TO SAFEGUARDS
CONTINGENCY EVENTS**

Approved ^{w/ comment.} Disapproved Abstain

Not Participating

COMMENTS:



SIGNATURE

11/8/99

DATE

Entered on "AS" Yes No

Comments from Commissioner Merrifield for SECY-99-241:

I approve the implementation of option 3 in SECY-99-241. Physical security of commercial nuclear power plants is an important issue. I firmly believe the appropriate amount of physical security is a vital asset. However, security requirements should be based on risk-based principals designed to protect the public health and safety. The implementation of requirements for periodic drills and exercises is only one aspect of our security regulations that requires revision. Therefore, I support an integrated approach to changing our physical security regulations and developing appropriate regulatory guidance so each licensee will clearly understand what is minimally acceptable.

However, the interim between the end of the current OSRE schedule and the implementation of the revised security regulations is also very important to me. I have no objections to the staff discussing with appropriate stakeholders a pilot program to be implemented during this interim period. However, I would like to be kept informed of the details of the pilot program, which could be submitted in an information paper. In addition, I would like periodic (annually would be acceptable) updates on the implementation and lessons learned from the pilot program. These updates could take the form of either a Commission briefing or an information paper.



11/8/99