



Public Meeting on
Operational Safeguards Response Evaluations
and Safeguards Performance Assessment

September 6, 2000

Agenda

Introductions and Opening Remarks

Conduct of Operational Safeguards Response Evaluations (OSREs)

Safeguards Performance Assessment (SPA) Program

Comments and Questions

Objectives

- To clarify staff guidance during the second cycle of the OSRE program and provide the status of the NRC's efforts regarding the SPA Program
- Allow the industry an opportunity to provide the status of its efforts regarding the SPA Program
- To obtain stakeholder feedback

Conduct of OSREs

- Existing Regulations
 - 10 CFR 73.55
 - High assurance objective
 - No unreasonable risk to the public health and safety
 - Protect against the design basis threat of radiological sabotage in 10 CFR 73.1(a)
 - 10 CFR 73.55(b)(4)(i)
 - Upon request, licensees shall demonstrate the ability of security personnel to carry out their responsibilities
 - 10 CFR 73.1(a)
 - The design basis threat (DBT) shall be used to design safeguards systems to protect against acts of radiological sabotage

- **10 CFR 73.1(a)(1) DBT of Radiological Sabotage** - a determined violent external assault, attack by stealth, or deceptive actions, of several persons with the following attributes, assistance and equipment:
 - well-trained (including military training and skills) and dedicated individuals
 - inside assistance which may include a knowledgeable individual who attempts to participate in a passive role (e.g. provide information), an active role (e.g., facilitate entrance and exit, disable alarms and communications, participate in violent attack), or both
 - suitable weapons, up to and including hand-held automatic weapons, equipped with silencers and having effective long range accuracy
 - hand-carried equipment, including incapacitating agents and explosives for use as tools of entry or for otherwise destroying reactor, facility, transporter, or container integrity or features of the safeguards system
 - a four-wheel drive land vehicle used for transporting personnel and their hand-carried equipment to the proximity of vital areas
 - an internal threat of an insider, including an employee (in any position)
 - a four-wheel drive land vehicle bomb.

Conduct of OSREs

- OSRE Adversary Characteristics
- Second Cycle OSRE Guidance
 - OSRE will continue until SPA is approved and implemented
 - Lead Office - Region
 - Scheduling and Selection Criteria
 - Inspection Procedure - IP 81110
 - NRR and Contractor Support
 - Enhanced Oversight
 - Pre-OSRE Meetings
 - Significance Determination Process

Conduct of OSREs (continued)

- Entrance/Exit Meetings
- Number of Responders according to Contingency Plan
- Consensus on Target Sets which achieve Core Damage
- Credit for Operator Actions
- Exercise Artificialities and Scenario/Controller Issues
- Enforcement

Conduct of OSREs (continued)

- Success Criteria
 - Licensee's performance is a success if the response force effectively protects against the adversary's disabling and/or destroying all pieces of equipment in a target set
 - During the conduct of the OSRE, findings will be evaluated to identify any significant or programmatic deficiencies in meeting performance objectives of the protective strategy

Safeguards Performance Assessment (SPA) Program

- Industry Self-Assessment Initiative: NEI 99-07
 - NEI 99-07, Draft 4 forwarded to NRC on April 24, 2000
 - NRC staff comments provided to NEI on May 19, 2000
 - NEI 99-07, Draft 5 forwarded to NRC on June 8, 2000
 - Project status and issues provided to the Commission in SECY-00-0142, June 26, 2000
 - Highly attended meeting to discuss issues with agency stakeholders held on July 6, 2000
- Progress on the resolution of specific issues continues

(SPA) Program (continued)

- Progress on the resolution of specific issues
 - Adversary characteristics to be used during OSRE/SPA
 - OSRE Adversary Characteristics approved for use
 - Adversary Characteristics Document (ACD) under development for Commission approval
 - Commitment to SPA
 - Industry commitment by letter
 - Associated NRC Regulatory Guide
 - Enforcement
 - Industry commitment to SPA would be enforceable
 - Staff has the authority to enforce findings
 - Staff retains the ability to conduct OSREs as necessary

(SPA) Program (continued)

- Operator Actions
 - Full credit will be given for training in routine and emergency procedures and will be considered in target set development
 - Draft evaluation criteria have been developed (NEI letter, August 10, 2000)
- Performance Criteria (Critical Safety Functions / Core Damage / Significant Core Damage)
 - Protecting Critical Safety Functions presented to Commission in SECY-00-063, March 9, 2000
 - Approach approved in SRM dated April 12, 2000
 - Federal Register comment period ended August 23.
 - Comments from a variety of agency stakeholders
 - Staff is assessing public comments and will report findings to the Commission

Proposed Schedule for SPA Program

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|----------------|---|
| September 2000 | - Development of Regulatory Guide
- SPA Inspection Procedure 71130.03 |
| October 2000 | - Resolution of Issues / NEI 99-07 Draft 6
- Finalize Regulatory Guide / Approve IP 71130.03 |
| November 2000 | - NRC Management Review of SPA and Reg Guide
- Industry Review and Vote |
| December 2000 | - Finalize Documents
- ACRS/CRGR review |
| January 2001 | - Publish and Public Comment on Regulatory Guide |
| April 2001 | - Commission review and decision |
| May 2001 | - Industry implementation of SPA |