

2004 NRC Regulatory Information Conference

**Session T1 – Safeguards/Security
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Design Basis Threat Currently Inadequate

- Intelligence community advises that sites should be able to protect against squad-sized force – 12-14 terrorists
- NRC DBT isn't even close
- NRC uses reverse logic: "... revised DBT is an adequate and reasonable standard for a private security force to protect against."

Design Basis Threat Should be Based on Threat

- Ask “What is the credible threat against these plants?” and then develop a DBT based on that threat
- DOE relies on private security forces, yet has a much more robust DBT

Recommendations for More Realistic Force-on-Forces

- Limit advance warning to two weeks
- Make time of attack less obvious
- Conduct most tests in the dark
- Use a trained adversary team from the military or develop NRC's own adversary team
- Use more lethal weapons known to be used by terrorists

Security Allegations Process is Broken

- If you have security concerns, it is virtually impossible to use the NRC's safety allegations process and get results
- The system relies on the licensee's acknowledgement that there is a problem and on their assurance that they will fix it

Unrealistic Expectations for Security Plans

- Licensees are working without adequate NRC guidance on the 65 security plans due to be submitted to NRC by April 2004
- NRC is required to approve them by October 2004 -- in only six months
- Real security plans take months to prepare
- Where will the utilities and NRC get the expertise to develop and approve these security plans on this timeline?