**NRC INSPECTION MANUAL** NSIR/DSO

INSPECTION MANUAL CHAPTER 2200, APPENDIX A

SECURITY CONSTRUCTION INSPECTION PROGRAM

Effective Date: 01/29/2019

2200-01 PURPOSE

This Appendix lists the inspectable areas within the Security Cornerstone and inspection procedures (IPs) to be used when reviewing the licensee construction programs, as outlined in Section 08.01 of Inspection Manual Chapter (IMC) 2504, “Construction Inspection Program: Inspection of Construction and Operational Programs.” The purpose of these inspections is to verify that the licensee has programs established and implemented to:

1. Control security activities at the site;
2. Identify problems and resolve them;
3. Report deficiencies and identify failures;
4. Ensure design requirements are translated to construction documentation; and,
5. Ensure the adequacy of inspections, tests, analyses, and acceptance criteria (ITAAC) determination packages for submittal to the U.S. Nuclear Regulatory Commission (NRC).

2200-02 OBJECTIVES

02.01 To gather information to determine whether a licensee is meeting the security programs for construction inspection and operations cornerstone (Construction Reactor Oversight Process (cROP) Security Cornerstone).

02.02 To verify and assess the adequate implementation of licensee security construction and operational programs.

02.03 To identify those significant issues that may have generic applicability or cross-cutting applicability to other cROP cornerstones.

2200-03 APPLICABILITY

The program described in this IMC is applicable to all power reactors under construction that are subject to oversight under the NRC’s cROP. The guidance in this IMC applies to all NRC personnel with responsibilities for oversight of security operations and programs at power reactors under construction.

2200-04 DEFINITIONS

Applicable definitions are found in IMC 2506, “Construction Reactor Oversight Process General Guidance and Basis Document.”

2200-05 RESPONSIBILITIES AND AUTHORITIES

Applicable responsibilities and authorities are found in IMC 2200, “Security Inspection Program for Construction.”

2200-06 REQUIREMENTS

Inspectable Areas within the Security Cornerstone.

The NRC’s security construction inspection program requires the inspectable areas below to be reviewed at each NRC-licensed power reactor under construction. The inspectable areas verify aspects of key attributes of the construction security cornerstone in the safeguards strategic performance area.

| Inspectable Areas |
| --- |
| Inspection of ITAAC-Related Security Structures, Systems, and Components |
| Fitness-for-Duty Program |
| Access Authorization |
| Access Control |
| Performance Evaluation Program |
| Equipment Performance, Testing, and Maintenance |
| Protective Strategy Evaluation |
| Protection of Safeguards Information |
| Security Training |
| Fitness-for-Duty (FFD) Operational Program |
| Cyber Security Inspection for Construction |
| Security Organization, Management Effectiveness, Program Reviews and Audits |
| Material Control and Accounting (MC&A) |
| Review of New Reactor Target Sets |
| Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance |
| Fitness-for-Duty Program for Construction |
| Protection of Safeguards Information for Construction |

2201-07 GUIDANCE

| Inspection Procedure Number | [[1]](#footnote-2)Security Construction and Operational Program[[2]](#footnote-3) | Direct Inspection Effort (DIE)[[3]](#footnote-4) |
| --- | --- | --- |
| 65001.17 | Inspection of ITAAC-Related Security Structures, Systems, and Components | 160 |
| 71130.08 | Fitness-for-Duty Program | 24 |
| 81000.01 | Access Authorization | 32 |
| 81000.02 | Access Control | 20 |
| 81000.03 | Performance Evaluation Program | 10 |
| 81000.04 | Equipment Performance, Testing, and Maintenance | 38 |
| 81000.05 | Protective Strategy Evaluation | 100 |
| 81000.06 | Protection of Safeguards Information | 10 |
| 81000.07 | Security Training | 27 |
| 81000.08 | Fitness-for-Duty (FFD) Operational Program | 33 |
| 81000.09 | Cyber Security Inspection for Construction | 320 |
| 81000.10 | Security Organization, Management Effectiveness, Program Reviews and Audits | 26 |
| 81000.11 | Material Control and Accounting (MC&A) | 6 |
| 81000.14 | Review of New Reactor Target Sets | 48 |
| 81431 | Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance | 11 |
| 81504 | Fitness-for-Duty Program for Construction | 38[[4]](#footnote-5) |
| 81505 | Protection of Safeguards Information for Construction | 10 |
| Security Construction and Operational Inspection Program Total**[[5]](#footnote-6)** | 913 |

Security Construction Cornerstone Inspection — Annualized Grand Total — 913 DIE

2201-07 REFERENCES

IMC 2200, “Security Inspection Program for Construction”

IMC 2504, “Construction Inspection Program: Inspection of Construction and Operational Programs”

IMC 2506, “Construction Reactor Oversight Process General Guidance and Basis Document”

END

ATTACHMENT 1 – Revision History for IMC 2200, Appendix A, “Security Construction Inspection Program”

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| CommitmentTrackingNumber | Accession NumberIssue DateChange Notice | Description of Change | Description ofTraining Requiredand Completion Date | Comment Resolution and Closed Feedback Form Accession No. (Pre‑Decisional, Non‑Public Information) |
| N/A | ML12086022409/07/2012CN 12-020 | Researched commitments back four years and found none. Appendix developed to support security construction inspections under IMC 2200. | Training to be covered at the July 2013 Annual Security Counterpart Meeting. | N/A |
| N/A | ML18324A84201/29/19CN 19-004 | Administrative edits made to include: formatting to IMC 0040 standards, updates to IP names, IP numbers, and DIE hours. Upon completion of a SUNSI review, the staff concluded that this IMC should be decontrolled. Consistent with the staff’s SUNSI determination, this IMC is now publicly available. | N/A | ML18324A841 |
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1. [↑](#footnote-ref-2)
2. The Office of Nuclear Security and Incident Response (NSIR) funds the security inspection budget. [↑](#footnote-ref-3)
3. All time (hours) spent performing direct inspection activities by resident inspectors, region-based inspectors, and headquarters inspectors in support of the reactor inspection program. [↑](#footnote-ref-4)
4. Subsequent fitness-for-duty inspections occur every 2 years, with a total of 20 hours of DIE. [↑](#footnote-ref-5)
5. The total does not include construction resident inspector activities that are not considered DIE. In the interim, both the Office of New Reactors and NSIR will fund the inspection budget allocation in part. [↑](#footnote-ref-6)