

November 22, 1999

MEMORANDUM TO: William D. Travers  
Executive Director for Operations

FROM: Annette Vietti-Cook, Secretary /s/

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

The Commission has approved Option 3, as recommended by the staff, to begin a comprehensive review of [10 CFR 73.55](#), including exercise requirements and associated security regulations.

Early in the process the staff should prepare position papers for Commission consideration concerning the attributes of the design basis threat and the definition of radiological sabotage.

It is important that the staff ensure that an effective pilot program for drills and evaluations is in place by mid-2000. The staff should keep the Commission informed of the details of the pilot program, which could be submitted in an information paper. The staff should immediately inform the Commission of delays in implementing the pilot program. In addition, the staff should provide 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.

In developing the rule, the staff should pay particular attention to the degree to which risk insights can be used to develop target sets, and to the integration of security inspections and performance indicators into the new oversight process. The rule should provide for flexibility in implementing its provisions, and, most importantly, it should not unnecessarily burden operational safety at nuclear power plants.

The staff should consider, as part of this rulemaking, how to credit operator actions during an attempt at radiological sabotage.

The staff should inform the appropriate Congressional Committees of the Commission's decision on [SECY-99-241](#) simultaneously with making the SRM publicly available.

cc: Chairman Meserve  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
CIO  
CFO  
OCA  
OIG  
OPA  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR  
DCS