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## INSPECTION MANUAL CHAPTER 2201 APPENDIX A

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### SECURITY BASELINE INSPECTION PROGRAM

Effective Date: January 1, 2025

#### 2201A-01 PURPOSE

This baseline inspection program is part of the U.S. Nuclear Regulatory Commission's (NRC) security inspection program to assess the security performance of operating nuclear power reactor licensees subject to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 73, 10 CFR Part 26, and NRC imposed requirements, such as orders.

#### 2201A-02 OBJECTIVES

The objectives of the security baseline inspection program are:

- a. To gather sufficient, factual inspection information to determine whether a licensee is meeting the objective of the security cornerstone, which is to provide assurance that the licensee's security programs and protective strategy can protect against the design basis threat of radiological sabotage consistent with the general performance objective of 10 CFR 73.55(b); and that the licensee's material control and accounting (MC&A) program includes processes for the control and accountability of special nuclear material to include the identification and notification of theft or loss consistent with 10 CFR Part 74.
- b. To determine the licensee's ability to identify, assess the significance of, and effectively correct security issues commensurate with the significance of the issue.
- c. To verify the accuracy and completeness of performance indicator (PI) data used in conjunction with inspection findings to assess the security performance of power reactor licensees.
- d. To provide a mechanism for the NRC to remain cognizant of security status and conditions.
- e. To identify those significant issues that may have generic applicability or cross-cutting applicability to the safe and secure operation of licensee facilities subject to the requirements of 10 CFR Part 73.

#### 2201A-03 APPLICABILITY

This inspection manual chapter (IMC) appendix is applicable to all operating commercial power reactor licensees that possess a license under 10 CFR Part 50 or 10 CFR Part 52. The program requirements identified within this document apply to all NRC offices and personnel who are tasked with the inspection and oversight of security performance through the NRC's Reactor Oversight Process (ROP) at nuclear power reactors licensed by the NRC.

## 2201A-04 SCOPE

Security baseline inspections provide a sufficient examination of licensee activities in order to monitor licensee performance and to meet the objectives identified above and to assure that licensees' security programs are meeting the objectives of the security cornerstone of the ROP.

## 2201A-05 RESOURCES

The baseline inspection procedures (IPs) and their attachments define the effort and requirements necessary to obtain an adequate assessment of an inspectable area. For resource planning purposes, each baseline IP attachment includes an estimate of the average inspection hours necessary to complete the procedure. These estimates are not goals, standards, or limitations; rather, they are included to assist in planning resource allocations, and will be revised periodically, based on insights gained through the implementation of inspection activity. It is expected that the actual hours required to complete an individual IP at a particular plant will vary from the estimate. See IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase," and IMC 2201, "Security Inspection Program for Commercial Nuclear Power Reactors," Section 08.02 for additional discussion.

The Office of Nuclear Security and Incident Response provide the regional offices with a band of expected effort (approximately +/- 10 percent) for each baseline IP per site as a process control. Regional management is expected to review those situations when inspection effort falls outside of the control bands for possible programmatic insights and recommended changes to the program.

## 2201A-06 PHILOSOPHY OF THE SECURITY BASELINE INSPECTION PROGRAM

The security baseline inspection program provides indication of licensee performance with respect to the implementation of security programs and MC&A processes. The program was developed utilizing risk insights, lessons learned, and a risk-informed approach, where applicable, to determine a comprehensive list of areas to inspect within the security cornerstone of the ROP (see IMCs 2515, 2201, and 0305, "Operating Reactor Assessment Program," for additional discussion). The assessment of plant performance relies on information provided by PIs and inspections.

## 2201A-07 DESCRIPTION OF SECURITY BASELINE INSPECTION PROGRAM

The security baseline inspection program is currently comprised of three parts: inspection of inspectable areas, verification of PI data, and problem identification and resolution.

## 2201A-08 ASSESSING INSPECTION FINDINGS

The baseline security significance determination process described in IMC 0609, Appendix E, "Security Significance Determination Process," is used for determining the security significance of inspection findings and security-related events. The enforcement process, as defined in the NRC Enforcement Manual, is also applicable to security-related findings.

The significance of security inspection findings will be described in inspection reports and their cover letters, as specified in IMC 0611, "Power Reactor Inspection Reports," and Exhibit 4. The

findings (a redacted description) will also be entered into the Replacement Reactor Program System for tracking and entered into the Plant Issues Matrix (PIM). This redacted description will not become available to the public through the ROP public Web site but will be available to internal NRC users. The existence of a security finding will be displayed on the public Web site but will only be characterized as either green or greater-than-green. Inspectors should still provide the specific significance of a finding when making a PIM entry, but the public Web site will generically display all greater-than-green findings in blue, to withhold the specific significance. In accordance with current agency policy, no other information or details related to security findings will be displayed on the public Web site. Safeguards information (SGI) will not be entered into the PIM. For findings where a full description would require disclosure of SGI, the issue should be described broadly in the PIM at the sensitive, unclassified, non-safeguards information (SUNSI) security-related information level and not include SGI.

## 2201A-09 DOCUMENTING INSPECTIONS

The purpose of reporting the results of inspections is to document the scope of inspections and any substantive findings in support of the assessment process. Inspections will be documented in accordance with the guidance and requirements in IMC 0611. Security designation requirements will be adhered to for all inspection reports, temporary instructions, orders, etc., that contain or have the potential to contain, SGI. These documents shall be marked and controlled in accordance with NRC's Management Directive, Volume 12, "Security." If the document does not contain SGI, but does contain security-related information about a specific site or event, then the document will be designated as Official Use Only - Security-Related Information in accordance with the agency's SUNSI policy.

## 2201A-10 INSPECTION PLANNING

### a. Annual Inspection Planning.

See Attachment 2 to this appendix and IMCs 2201 and 2515 for additional guidance.

### b. Resident Inspector Utilization.

See IMCs 2201 and 2515 for additional information.

### c. Region-Based Inspection Planning.

See IMCs 2201 and 2515 for additional information.

### d. Level of effort.

See IMCs 2201 and 2515 for additional information.

### e. Adjustments.

See IMCs 2201 and 2515 for additional information.

### f. Completion status.

See IMCs 2201 and 2515 for additional information.

END

Attachments:

1. Inspectable Area Table
2. Resource Estimate Table
3. Revision History for IMC 2201, Appendix A

### Attachment 1: Inspectable Areas Within the Security Cornerstone

The baseline inspection program requires the inspectable areas below be reviewed at each NRC-licensed operating power reactor site. The inspectable areas verify aspects of key attributes of the security cornerstone in the safeguards strategic performance area.

Inspectable Area (note 1)
Access Authorization Program
Access Control Program
Contingency Response: Force-on-Force Testing
Equipment Performance, Testing, and Maintenance
Protective Strategy Evaluation
Security Training
Fitness-For-Duty Program
Cybersecurity
Material Control and Accounting
Target Set Review

Note 1: Temporary instructions will be utilized, as required, to supplant and/or augment the baseline inspection program.

\*\* This inspectable area attachment has not been developed.

## Attachment 2: Baseline Inspection Procedures and Estimated Resources

Inspection Procedure No.	Security for Power Reactors – Specific <sup>1</sup> (Title)	Freq. <sup>2</sup>	Annualized Estimated Resources <sup>3</sup>
71130.01	Access Authorization	T	8
71130.02	Access Control	A	28
71130.03	Contingency Response - Force-on-Force Testing	T	131
71130.04	Equipment Performance, Testing, and Maintenance	B	18
71130.05	Protective Strategy Evaluation	T	30
71130.07	Security Training	B	14
71130.08	Fitness-For-Duty Program	T	8
71130.10	Cybersecurity	TBD	TBD
71130.11	Material Control and Accounting (MC&A)	T	4
71130.14	Review of Power Reactor Target Sets	T	3
92707	Security Inspection of Facilities Impacted by a Local, State, or Federal Emergency Where the NRC's Ability to Conduct Triennial Force On-Force Exercises is Limited <sup>5</sup>	AN	
Security/Safeguards (Specific) Baseline Sub-Total <sup>4</sup>			244

Inspection Procedure No.	Security - Coordinated (Title)	Freq.	Annualized Estimated Resources <sup>3</sup>
71151	Performance Indicator Verification	A	4
71152	Problem Identification and Resolution (PI&R)	A/B	23
71153	Follow up of Events and Notices of Enforcement Discretion	AN	7
Security/Safeguards (Coordinated) Baseline Sub-Total			34

Security Cornerstone Baseline Inspection-Annualized Grand Total<sup>4</sup> 278 hours

1. Inspection budget funded by NSIR.
2. A = Annual, B = Biennial, T = Triennial, Q = Quadrennial, AN = As Needed.  
See IMC 2201 for definitions.
3. Direct inspection effort (hours), based on conducting the nominal range of inspection requirements within the inspectable area.
4. Total does not include resident inspector plant status activities that are not considered direct inspection effort. Inspection budget allocation for these inspections will be funded by the Office of Nuclear Reactor Regulation.
5. The annualized estimated resource for IP 92707 will utilize resources allocated for IP 71130.03. IP 92707 Inspections will only be conducted if IP 71130.03 cannot be performed. In some cases, due to changing site conditions, it may be necessary to implement IP 92707 to replace the exercise week in IP 71130.03.

Attachment 3: Revision History for IMC 2201 Appendix A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	02/19/04 CN 04-007	Initial issuance.	None	N/A
N/A	ML073470672 01/10/08 CN 08-001	This document is revised to reflect the removal of IP 71130.06 from the Security Baseline Inspection Program.	None	ML073530003
N/A	ML081440350 09/08/09 CN 09-021	This document was revised to remove references to programs other than operating power reactors and to update program resource estimates.	None	ML091380054
N/A	ML093421276 01/12/10 CN 10-002	This document has been revised to address the changes to 10 CFR Part 73 that resulted from a rulemaking; and in accordance with the ROP realignment process.	None	ML093421291
N/A	ML100340615 02/24/10 CN 10-007	Effective date changed to 04/01/10.	None	N/A
N/A	<a href="#">ML120930211</a> 06/13/12 CN 12-009	This document was revised to reflect reintegration of the security cornerstone into the ROP Action Matrix, and suspension of IMC 0320.	None	ML12132A340
N/A	ML13234A525 09/22/15 CN 15-017	This document has been revised to incorporate minor administrative changes along with revisions to resource allocations that reflect current program resource implementation.	None	MI15209A579

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML16294A078 11/09/16 CN 16-029	This document has been revised to reflect the resource estimate associated with the conduct of the nominal range of inspection requirements in each inspectable area.	None	ML16294A081
N/A	ML17306A093 09/11/18 CN 18-031	This document was reviewed and updated in response to Staff Requirements – SECY 16-0073 (Options and Recommendations for the Force-On-Force Inspection Program) and the March 2017 Assessment Team (Regions and HQ) review for redundancies and efficiencies of the 71130 series IPs for power reactors. Specifically, this document has been revised to incorporate minor administrative changes along with revisions to resource allocations that reflect current program resource implementation. Additionally, during this revision, a complete SUNSI review was conducted in which the staff concluded that this document should be de-controlled. Consistent with the staff's SUNSI determination, the SUNSI markings of this document have been removed.	N/A	ML17306A094
N/A	ML21050A367 04/22/21 CN 21-019	This revision of this IMC adds IP 92707 as an as-needed baseline inspection.	N/A	N/A
	ML24303A403 12/13/24 CN 24-043	This revision removes IP 71130.06 from IMC 2201A, which has been moved to IMC 2201C as IP 81822.	N/A	ML24303A404