
INSPECTION PROCEDURE 81608

REPORTING OF SAFEGUARDS EVENTS – NON-POWER REACTORS

Effective Date: May 1, 2025

PROGRAM APPLICABILITY: IMC 2545

81608-01 INSPECTION OBJECTIVES

- 01.01 To verify and assess that the licensee has appropriately reported any lost or recovered shipments of special nuclear material (SNM) or spent fuel.
- 01.02 To verify and assess that the licensee has appropriately reported safeguards events associated with the facility.
- 01.03 To assure that the licensee has appropriately logged safeguards events and conditions adverse to security.
- 01.04 To assure that the licensee has appropriately reported suspicious activities.

81608-02 INSPECTION REQUIREMENTS

General Guidance

Through verification of the inspection requirements within this inspection procedure (IP), inspector(s) shall gather information to determine whether reasonable assurance exists that licensee activities, since the last inspection, were conducted in accordance with regulatory requirements in Title 10 of the *Code of Federal Regulations* (CFR) Part 73, "Physical Protection of Plants and Materials," and Part 74, "Material Control and Accounting of Special Nuclear Material."

In preparing to complete this procedure, the inspector(s) should familiarize themselves with relevant documentation which may include, but is not limited to, the licensee's security plans, site-specific implementing procedures, security event logs, and security program reviews and audits.

02.01 Safeguards Event Reporting - Shipments

- a. Verify that the licensee has notified the Nuclear Regulatory Commission (NRC) Headquarters Operations Center within 15 minutes of a security event based on an imminent or actual hostile action against a shipment of Category I strategic special nuclear material (SSNM), spent nuclear fuel (SNF), or high-level radioactive waste (HLW). (10 CFR 73.1200(b))
- b. Verify that the licensee has notified the NRC Headquarters Operations Center within 1 hour of discovery of significant transportation security events. (10 CFR 73.1200(d))

- c. Verify that the licensee has notified the NRC Headquarters Operations Center within 4 hours of discovery of transportation security events. (10 CFR 73.1200(f))
- d. Verify that the licensee has notified the NRC Headquarters Operations Center within 8 hours of discovery of transportation security failures. (10 CFR 73.1200(h))
- e. Verify that the licensee has followed the initial notification by a written report within 60 days. (10 CFR 73.1205(a))
- f. Verify that the licensee maintained records of any written reports for a period of 3 years from the date of the report, or until the license is terminated, whichever is later. (10 CFR 73.1210(b))

Specific Guidance

In addition to lost or unaccounted shipments, the inspector should note these notifications may also be made for shipments that have not arrived at their destination by the estimated time of arrival.

02.02 Safeguards Event Reporting - Facilities

- a. For licensees that are subject to the provisions of § 73.60, or § 73.67: Verify that the licensee has notified the NRC Headquarters Operations Center within 1 hour of discovery of significant facility security events. (10 CFR 73.1200(c))
- b. For licensees that possess more than one gram or more of contained uranium-235, uranium-233, or plutonium: Verify that the licensee notified the NRC Headquarters Operation Center within 1 hour of discovery of any loss or theft or other unlawful diversion of special nuclear material which the licensee is licensed to possess, or any incident in which an attempt has been made to commit a theft or unlawful diversion of special nuclear material. (10 CFR 74.11(a))
- c. For licensees that are subject to the provisions of § 73.60, or § 73.67: Verify that the licensee has notified the NRC Headquarters Operations Center within 4 hours of discovery of facility security events. (10 CFR 73.1200(e))
- d. For licensees that are subject to the provisions of § 73.60, or § 73.67: Verify that the licensee has notified the NRC Headquarters Operations Center within 8 hours of discovery of security program failures. (10 CFR 73.1200(g))
- e. Verify that the licensee has followed the initial notification by a written report within 60 days. (10 CFR 73.1205(a))
- f. Verify that the licensee, maintained records of any written reports for a period of 3 years from the date of the report, or until the license is terminated, whichever is later. (10 CFR 73.1210(b))

Specific Guidance

The inspector should note that references to the licensee's safeguards system are generally synonymous with the physical security system as described by the NRC-approved physical security plan. The time period allowed for reporting of events

begins upon discovery of the event by any member of the security organization or any other employee of the licensee.

02.03 Safeguards Events Log

- a. For licensees that transport spent nuclear fuel or possess a quantity of SSNM equal to or greater than SNM Moderate Strategic Significance (MSS): Verify that the licensee maintains a current log of safeguards events recorded within 24 hours of discovery to include: (10 CFR 73.1210(a)(1))
 1. Any failure, degradation, or discovered vulnerability in a security or safeguards system, for which compensatory measures have not been employed with the required time frame, that could have allowed unauthorized or undetected access of a Protected Area (PA), Material Access Area (MAA), Controlled Access Area (CAA), Vital Area (VA). (10 CFR 73.1200(g)(1)(i))
 2. Any other threatened, attempted, or committed act not previously defined in the regulations with the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan or the actual condition of such reduction in effectiveness. (10 CFR 73.1210(f))
- b. Verify that the licensee retained records of any safeguards events for 3 years after the last entry in each log or until the license is terminated. (10 CFR 73.1210(e)], 10 CFR 73.1210(b)(2))

Specific Guidance

No inspection guidance.

02.04 Suspicious Activity Reports - Shipping Activities and Facilities and Materials

- a. Verify that the licensee has reported suspicious activities to appropriate agencies and the NRC Headquarters Operations Center. (10 CFR 73.1215(a), 10 CFR 73.1215(c)(3), 10 CFR 73.1215(c)(4))
- b. Verify that the licensee has notified the NRC Headquarters Operations Center if a suspicious activity report has resulted in local law enforcement agency (LLEA) response. (10 CFR 73.1215(c)(1)(iii))
- c. Verify that the licensee has notified the NRC Headquarters Operations Center within 4 hours of discovery of a suspicious activity. (10 CFR 73.1215(c)(2)(i), 10 CFR 73.1215(d)(1), 10 CFR 73.1215(e)(1))

Specific Guidance

The inspector should note the reporting criteria and process for licensees to use in reporting suspicious activities. Licensees are required to report suspicious activities to the LLEA, the Federal Bureau of Investigation (FBI) local field office, the NRC, and the Federal Aviation Administration (FAA) local control tower if aircraft are a part of the suspicious activity.

81608-03 PROCEDURE COMPLETION

The inspection of each of the applicable areas described above will constitute completion of this procedure. The frequency at which this inspection procedure is to be completed is dependent on the quantity of SNM possessed and is described in Inspection Manual Chapter (IMC) 2545. The typical frequencies are biennially (once every 2 years) for facilities possessing SNM MSS or triennially (once every 3 years) for facilities possessing SNM Low Strategic Significance (LSS).

81608-04 RESOURCE ESTIMATE

For planning purposes, the estimated, direct, onsite inspection effort to complete this inspection procedure is 1 hour. Actual inspection at any facility may require more or less effort depending on past inspection history, changes since the last inspection, conditions at the facility, and significance of the inspection findings.

81608-05 REFERENCES

Regulatory Guide (RG) 5.62, "Reporting of Safeguards Events"

RG 5.87, "Suspicious Activity Reports Under 10 CFR Part 73"

IMC 2545, "Research and Test Reactor Inspection Program"

END

Attachments:

Attachment 1: Revision History for 81608

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Changes	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML19190A272 03/13/20 CN 20-015	Initial issue to support inspection of research and test reactor programs described in IMC 2545.	N/A	ML19205A354
N/A	ML25114A178 05/01/25 CN 25-010	Revised to support inspection of research and test reactor programs described in IMC 2545.	None	N/A