

design basis threat of radiological sabotage as stated in 10 CFR 73.1(a)?

Rationale: This change would allow better utilization of security force resources and would help maintain current levels of assurance. Having a second armed security officer present during a vehicle search provides little, if any, additional deterrence to a potential adversary. CCTV coverage of vehicle access control and searches has a deterrence similar to the presence of the second officer.

3. ☐ Yes ☐ No Does this change any unique site-specific commitments?

Rationale: (Explain why the change does not decrease the overall effectiveness of the plan while taking into consideration existing unique site-specific security features. Consider historical reasons why specific commitments were included in the security plans. Were there specific counterbalancing commitments and has that counterbalance been changed negatively?)

Screening Criteria Form

(Assessment of Acceptability of 10 CFR 50.54(p) Plan Change)

Example III

Safeguards Information

Section/Title

This is an example. In an actual 50.54(p) determination, this section would give specific references to the parts of the security plan the licensee proposes to change.

Proposed Commitment

Currently, all lists of vital equipment are controlled as safeguards information (SGI). The following criterion defines what information needs to be controlled as SGI.

The following three elements must be present before "documents or other matter" are designated SGI in accordance with 10 CFR 73.21(b)(1)(vii):

(1) the safety-related equipment must be designated as vital equipment or be specified as being located in a vital area in either the licensee's physical security plan (PSP), the safeguards contingency plan (SCP) or, if applicable, any licensee-generated plant-specific safeguards analyses; and

(2) the equipment or area must be specifically designated as "vital" in the "documents or other matter" being reviewed; and

(3) the physical protection measures (other than any general regulatory requirement stated in 10 CFR 73.55) afforded the equipment or area, as described in either a licensee's PSP, a SCP, or a plant-specific safeguards analysis,* must also be specifically described in the "documents or other matter."

*Plant-specific sabotage scenarios or vulnerabilities in the physical protection system are considered SGI.

Impact on Effectiveness on a Generic Plan

1. ☐ Yes ☐ No Does this change delete or contradict any regulatory requirement?
2. ☐ Yes ☐ No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10 CFR 73.55 to protect with

the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a)?

Rationale: This change allows the licensee to include a list of vital areas in training documents for licensee operations personnel without treating the documents as SGI. This change would also reduce the amount of SGI generated, handled, and stored. A non-SGI list does not decrease the effectiveness of the plan due to the absence of the above criteria and the fact that safety equipment lists are available from other sources.

3. ☐ Yes ☐ No Does this change any unique site-specific commitments?

Rationale: (Explain why the change does not decrease the overall effectiveness of the plan while taking into consideration existing unique site-specific security features. Consider historical reasons why specific commitments were included in the security plans. Were there specific counterbalancing commitments and has that counterbalance been changed negatively?)

Screening Criteria Form

(Assessment of Acceptability of 10 CFR 50.54(p) Plan Change)

Example IV

Protected Area Patrols

Section/Title

This is an example. In an actual 50.54(p) determination, this section would give specific references to the parts of the security plan the licensee proposes to change.

Proposed Commitment

Reduce frequency of protected area (PA) patrols. Patrol frequency would be reduced to a minimum of two patrols per shift (8 hours) or no less than once every 4 hours.

Additional patrols contribute minimally to security effectiveness. Reduction of number of patrols would provide for more effective use of personnel resources. The consideration that all employees, as well as security force members, are trained to report any suspicious individuals or materials in the protected area decreases the importance of more frequent patrols.

Impact on Effectiveness on a Generic Plan

1. ☐ Yes ☐ No Does this change delete or contradict any regulatory requirement?
2. ☐ Yes ☐ No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10 CFR 73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a)?

Rationale: Previously issued guidance states that a patrol at least every 4 hours meets the performance requirements of the regulation.

- ☐ Yes ☐ No Does this change any unique site-specific commitments?

Rationale: (Explain why the change does not decrease the overall effectiveness of the plan while taking into consideration existing unique site-specific security features. Consider historical reasons why specific commitments were included in the security plans. Were there specific counterbalancing

commitments and has that counterbalance been changed negatively?)

Screening Criteria Form

(Assessment of Acceptability of 10 CFR 50.54(p) Plan Change)

Example V

Security Organizational Changes

Section/Title

This is an example. In an actual 50.54(p) determination, this section would give specific references to the parts of the security plan the licensee proposes to change.

Proposed Commitment

Two levels of management would be eliminated, reducing the number of vertical layers of security staff organization. The change provides for more efficient management and possible savings in manpower resources. The number of guards for each shift directly involved in implementing the security plan would not be affected. Historically the NRC staff has not specified organizational or managerial structures. Published guidance is silent on the number of managers and the type of organizational structure for the security operation. Security management is judged by its performance and not by the number or type of managers.

Impact on Effectiveness on a Generic Plan

1. ☐ Yes ☐ No Does this change delete or contradict any regulatory requirement?
☐ Yes ☐ No Would the change decrease the overall level of security system performance as described in paragraphs (b) through (h) of 10 CFR 73.55 to protect with the objective of high assurance against the design basis threat of radiological sabotage as stated in 10 CFR 73.1(a)?

Rationale: With the actual number of on-duty security force members remaining unchanged, the implementation of the security plan should remain unchanged.

3. ☐ Yes ☐ No Does this change any unique site-specific commitments?

Rationale: (Explain why the change does not decrease the overall effectiveness of the plan while taking into consideration existing unique site-specific security features. Consider historical reasons why specific commitments were included in the security plans. Were there specific counterbalancing commitments and has that counterbalance been changed negatively?)

Screening Criteria Form

(Assessment of Acceptability of 10 CFR 50.54(p) Plan Change)

Example VI

Armed Responder Duties

Section/Title

This is an example. In an actual 50.54(p) determination, this section would give specific references to the parts of the security plan the licensee proposes to change.

Proposed Commitment

Assign duties other than armed response to security officers designated as members of the response team. Armed responders would