

be assigned additional duties that would not interfere with their contingency response. Assigned duties would be only ones that could be immediately abandoned for response purposes. This change allows for more efficient resource management. This change should not affect the security officers' ability to perform their duties as members of the response team. Use of response officers to perform additional duties has been an acceptable practice under current guidance. What has not been acceptable, as discussed in IN 86-88, is assigning responders to routine duties that cannot be abandoned during a security event when response is necessary.

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: Ability to abandon duties and respond will be demonstrated and documented. The number of armed responders is not reduced and their ability to respond is not affected.

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 VII

Qualification Schedule

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

The current plan specifies that security audits and weapons training (required by Appendix B to 73.55) be completed 1 year or less after the audit or training was last accomplished. This results in the due date of audits and training being adjusted each year and the audits and training, over a period of years, being completed more than once each 12 months. This change provides scheduling latitude in performing annually required security audits and weapons training. It allows use of a "tech spec" formula to provide flexibility in meeting audit and weapons training commitments. The revised commitment would allow fixed dates in the plan with a provision for extending the audit or training interval beyond 1 year (e.g., a maximum allowable extension not to exceed

25% of the surveillance interval, but the combined time interval for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specific surveillance interval).

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: There would be no impact on performance capabilities of the security program or security officer weapons proficiency. Audits and security training would still be conducted on an annual basis with only minor variations.

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 VIII

Guard/Watchman 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

Some security plans list numerous positions within the security organization and specifically identify whether a position is filled by an armed guard or unarmed watchman. For example, a plan may specify that operators of search equipment in the gatehouse and SAS/CAS officers will be armed. This change would allow certain security officer positions to be filled by unarmed watchmen rather than armed guards. Watchmen would be allowed to operate search equipment in the gatehouse, to man the CAS and SAS, and to escort individuals in the protected and vital areas.

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 does not involve any of the armed response force members. Consequently the response to security contingencies would remain the same.

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 IX

Vital Area Door Controls

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

Some licensees have committed to placement of vital areas within vital areas. This arrangement results in doors, identified as vital area doors, being located within other vital areas. This change would allow the number of doors controlled as vital to be reduced. Vital area doors located within vital areas (with the exception of the control room and the alarm stations) would no longer be designated as vital.

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: Unless the current response strategy to an external threat relies on delay or detection at internal vital area doors, elimination of their vital designation would not affect licensee response to a design basis external threat.

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 X

Security Vehicles

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.