

ISFSI AND MRS SECURITY RULEMAKING

Public Webinar on Draft Technical Basis

January 14, 2010

Phil Brochman and Rocky Rockhill

Division of Security Policy

Office of Nuclear Security and Incident Response

Agenda

- 1300 – 1310 Introduction
- 1310 – 1320 Objectives of this Security Rulemaking
- 1320 – 1350 Specific Technical Approaches
- 1400 – 1650 Questions and Comments
- 1650 – 1700 Closing

Rulemaking Objectives



- To improve consistency and clarity of 10 CFR Part 73 regulations for both types of ISFSI licensees (general and specific) and to reflect current Commission thinking on security requirements.
- To make generically applicable requirements similar to those imposed by the post-9/11 ISFSI security orders
- To use a risk-informed and performance based structure in updating these security regulations

Proposed Changes



- Use a risk-informed and performance-based approach with licensees performing dose calculations on specific security scenarios (applicable to their facility)
- Add a 0.05-Sievert (Sv) (5-Rem) dose limit requirement (at the controlled area boundary (CAB)) to Part 73 (equivalent to the §72.106 dose limits)
- Licensees would use an iterative approach and could change inputs (e.g., distance to the CAB) to achieve success or use engineered security features to prevent a security scenario
 - Worst case requires shift to a denial protective strategy

Proposed Changes

(Continued)



- Consistent outcomes across all ISFSIs and MRSs
 - All facilities will meet the 0.05 Sv dose limit at the CAB
 - However, security programs and plans can vary
- Require blast analysis and permanent vehicle barriers for land based and waterborne vehicle borne improvised explosive devices (VBIEDs).
 - Protection of the SNF/HLW, CAS/SAS, and transfer path
 - Protection of security personnel defensive positions (if licensee is implementing a denial protective strategy)
- Update these security regulations to use appropriate language from the NRC's recent power reactor security rule (see§73.55)

Proposed Changes

(Continued)



- Consolidate and reorganize the ISFSI and MRS regulations for both general and specific licenses into a series of contiguous sections in Part 73
- ISFSIs and MRS will no longer be subject to the DBT for radiological sabotage or the requirements of §73.55 (power reactor security requirements)
- Requirements will be separate; however, the ISFSI licensee's PSP can be integrated into a reactor's security plan or be contained in a separate (stand alone) plan

Proposed Changes

(Continued)



- Documentation and review of MOU with LLEA for Detect, Assess, and Communicate protective strategies
- New information submission requirement on ISFSI or MRS information (distances to boundaries, number of casks, etc)
- Security scenario guidance document (NUREG) being developed under a contract
 - Future cleared stakeholder comment opportunity

Supporting Information



- The staff is developing a draft regulatory guide (DG-5033) containing security performance (adversary) characteristics
 - Developed per Commission direction in SRM-SECY-07-0148
 - Contains Safeguards Information
- Draft DG-5033 will be sent to Commission before being issued for cleared stakeholder comment period
 - Cleared stakeholder comment meetings will also be held
 - FRN will be issued noticing meetings and opportunity to comment on DG-5033
- DG-5033 guidance is bounded by RG 5.69; however, there are some specific differences (both appearance and substance)

Specific Issues

- Physical Security Plan
- Training and Qualification Plan
- Contingency Response Plan
- Access Authorization Program
- Insider Mitigation
- Vehicle Barrier System
- Physical Barrier System
- Intrusion Detection Systems
- Video Capture
- Access Points and Search
- Alarm Station Capabilities
- Redundant Communications Equipment
- Independent Power Systems
- Single Node Failures
- Force-on-Force Evaluations
- Deadly Force Training
- Suspension of Security Measures
- Alternative Measures
- Records
- Compensatory Measures
- Maintenance, Testing, Calibration
- Security Program Reviews
- Security and Emergency Response
- ASOs and Armed Responders
- Effective and Compliance Dates

References

Draft Technical Basis, Revision 1 (December 2009) Docket ID: NRC-2009-0558	ML093280743
Commission: SECY-07-0148 (redacted)(August 28, 2007)	ML080030050
Commission: SRM-SECY-07-0148 (December 18, 2007)	ML073530119
Webinar Slides	ML093490243