

SECURITY CONSTRUCTION INSPECTION PROGRAM

Effective Date: 01/29/2019

2200-01 PURPOSE

This Appendix lists the inspectable areas within the Security Cornerstone and inspection procedures (IPs) to be used when reviewing the licensee construction programs, as outlined in Section 08.01 of Inspection Manual Chapter (IMC) 2504, "Construction Inspection Program: Inspection of Construction and Operational Programs." The purpose of these inspections is to verify that the licensee has programs established and implemented to:

1. Control security activities at the site;
2. Identify problems and resolve them;
3. Report deficiencies and identify failures;
4. Ensure design requirements are translated to construction documentation; and,
5. Ensure the adequacy of inspections, tests, analyses, and acceptance criteria (ITAAC) determination packages for submittal to the U.S. Nuclear Regulatory Commission (NRC).

2200-02 OBJECTIVES

02.01 To gather information to determine whether a licensee is meeting the security programs for construction inspection and operations cornerstone (Construction Reactor Oversight Process (cROP) Security Cornerstone).

02.02 To verify and assess the adequate implementation of licensee security construction and operational programs.

02.03 To identify those significant issues that may have generic applicability or cross-cutting applicability to other cROP cornerstones.

2200-03 APPLICABILITY

The program described in this IMC is applicable to all power reactors under construction that are subject to oversight under the NRC's cROP. The guidance in this IMC applies to all NRC personnel with responsibilities for oversight of security operations and programs at power reactors under construction.

2200-04 DEFINITIONS

Applicable definitions are found in IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document."

2200-05 RESPONSIBILITIES AND AUTHORITIES

Applicable responsibilities and authorities are found in IMC 2200, "Security Inspection Program for Construction."

2200-06 REQUIREMENTS

Inspectable Areas within the Security Cornerstone.

The NRC's security construction inspection program requires the inspectable areas below to be reviewed at each NRC-licensed power reactor under construction. The inspectable areas verify aspects of key attributes of the construction security cornerstone in the safeguards strategic performance area.

Inspectable Areas
Inspection of ITAAC-Related Security Structures, Systems, and Components
Fitness-for-Duty Program
Access Authorization
Access Control
Performance Evaluation Program
Equipment Performance, Testing, and Maintenance
Protective Strategy Evaluation
Protection of Safeguards Information
Security Training
Fitness-for-Duty (FFD) Operational Program
Cyber Security Inspection for Construction
Security Organization, Management Effectiveness, Program Reviews and Audits
Material Control and Accounting (MC&A)
Review of New Reactor Target Sets
Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance
Fitness-for-Duty Program for Construction
Protection of Safeguards Information for Construction

Inspection Procedure Number	Security Construction and Operational Program ¹	Direct Inspection Effort (DIE) ²
65001.17	Inspection of ITAAC-Related Security Structures, Systems, and Components	160
71130.08	Fitness-for-Duty Program	24
81000.01	Access Authorization	32
81000.02	Access Control	20
81000.03	Performance Evaluation Program	10
81000.04	Equipment Performance, Testing, and Maintenance	38
81000.05	Protective Strategy Evaluation	100
81000.06	Protection of Safeguards Information	10
81000.07	Security Training	27
81000.08	Fitness-for-Duty (FFD) Operational Program	33
81000.09	Cyber Security Inspection for Construction	320
81000.10	Security Organization, Management Effectiveness, Program Reviews and Audits	26
81000.11	Material Control and Accounting (MC&A)	6
81000.14	Review of New Reactor Target Sets	48
81431	Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance	11
81504	Fitness-for-Duty Program for Construction	38 ³
81505	Protection of Safeguards Information for Construction	10
Security Construction and Operational Inspection Program Total ⁴		913

Security Construction Cornerstone Inspection — Annualized Grand Total — 913 DIE

¹ The Office of Nuclear Security and Incident Response (NSIR) funds the security inspection budget.

² All time (hours) spent performing direct inspection activities by resident inspectors, region-based inspectors, and headquarters inspectors in support of the reactor inspection program.

³ Subsequent fitness-for-duty inspections occur every 2 years, with a total of 20 hours of DIE.

⁴ The total does not include construction resident inspector activities that are not considered DIE. In the interim, both the Office of New Reactors and NSIR will fund the inspection budget allocation in part.

2201-07 REFERENCES

| IMC 2200, "Security Inspection Program for Construction"

| IMC 2504, "Construction Inspection Program: Inspection of Construction and Operational Programs"

| IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document"

END

ATTACHMENT 1 – Revision History for IMC 2200, Appendix A, “Security Construction Inspection Program”

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 No. (Pre-Decisional, Non-Public Information)
N/A	ML120860224 09/07/2012 CN 12-020	Researched commitments back four years and found none. Appendix developed to support security construction inspections under IMC 2200.	Training to be covered at the July 2013 Annual Security Counterpart Meeting.	N/A
N/A	ML18324A842 01/29/19 CN 19-004	Administrative edits made to include: formatting to IMC 0040 standards, updates to IP names, IP numbers, and DIE hours. Upon completion of a SUNSI review, the staff concluded that this IMC should be decontrolled. Consistent with the staff's SUNSI determination, this IMC is now publicly available.	N/A	ML18324A841