

SECURITY INSPECTION PROGRAM FOR DECOMMISSIONING NUCLEAR POWER REACTORS

2202-01 PURPOSE

To establish inspection policy for the security inspection program for decommissioning nuclear power reactors for the Office of Nuclear Security and Incident Response (NSIR) following the certification date for the removal of all nuclear fuel from the reactor vessel in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(1)(ii) or 10 CFR 52.110(a)(2) and continue until license termination.

2202-02 OBJECTIVES

02.01 To obtain factual information providing objective evidence that the security at licensed facilities is maintained in a manner that contributes to public health and safety and promotes the common defense and security.

02.02 To determine that licensees have established measures to deter, detect and protect against the design basis threat of radiological sabotage, and controls and accounts for special nuclear material as required by regulations and other U.S. Nuclear Regulatory Commission (NRC) requirements such as orders.

02.03 To identify declining trends in performance and conduct security inspections to verify the licensee has resolved issues before performance declines below an acceptable level that could result in an undue risk to public health and safety.

02.04 To identify those significant issues that may have generic applicability to other decommissioning sites.

02.05 To provide for effective allocation of resources for the inspection of 10 CFR Part 50 and 10 CFR Part 52 power reactors following permanent cessation of operation.

2202-03 APPLICABILITY

The program described in this Inspection Manual Chapter (IMC) is applicable to all decommissioning power reactor licensees subject to the requirements in 10 CFR Part 73, "Physical Protection of Plants and Materials." The guidance in this IMC applies to all NRC personnel with responsibilities for oversight of security operations at decommissioning nuclear power reactors. This program is to be implemented following the certification date for the removal of all nuclear fuel from the reactor vessel (10 CFR 50.82(a)(1)(ii) or (10 CFR 52.110(a)(2)) and continue until license termination or the 10 CFR Part 50, Part 52 licensed site is reduced to a general or specific licensed independent spent fuel storage installation.

2202-04 DEFINITIONS OF INSPECTION FREQUENCIES

- 04.01 Quadrennial (QD) The inspection effort should be performed at least once every 4 years. It is not intended for this frequency to be based on a rolling 4-year cycle.
- 04.02 Triennial (T) The inspection effort should be performed at least once every 3 years. It is not intended for this frequency to be based on a rolling 3-year cycle.
- 04.03 Biennially (B) The inspection effort should be performed at least once every 2 years. It is not intended for this frequency to be based on a rolling 2-year cycle.
- 04.04 Annually (A) The inspection effort should be performed once each calendar year.
- 04.05 Semiannually (S) The inspection effort should be performed twice each year; once each half year.
- 04.06 Quarterly (Q) The inspection effort should be performed four times each year; once each calendar quarter.
- 04.07 Bimonthly (BM) This inspection effort should be performed six times each year; once every 2 months.
- 04.08 As Needed (AN) The inspection effort should be performed when the activity or event occurs at the facility as specified in the inspection procedures (e.g., transportation of irradiated fuel).

2202-05 RESPONSIBILITIES AND AUTHORITIES

- 05.01 Director, NSIR
- a. Provides overall program direction for the security inspection program.
 - b. Promulgates policies associated with the inspection of security at assigned decommissioning nuclear power reactors.
 - c. Provides overall assessment of security inspection effectiveness, uniformity, and completeness to meet or exceed agency performance goals.
- 05.02 Director, Office of Nuclear Material Safety and Safeguards (NMSS)
- a. Provides overall program direction and oversight for decommissioning nuclear power reactors.
- 05.03 Director, Division of Security Operations (DSO), NSIR
- a. In coordination with NRR or NMSS as applicable, establishes the budget for inspection resources to complete the objectives of this IMC.
 - b. Develops and implements programs and procedures for the security inspection of licensed decommissioning nuclear power reactors.

- c. Develops and assesses the overall effectiveness of the security inspection program. Coordinates with the Division Director of Decommissioning, Uranium Recovery, and Waste Programs (DUWP), NMSS, for periodic assessments of the security inspection program.
- d. Develops, maintains, and revises inspection program guidance and procedures applicable to security inspections. Incorporates lessons learned into the inspection program. Recommends changes to other organizations for IMCs, inspection procedures, and management directives under their purview that relate to the security inspection of decommissioning power reactors.
- e. Serves as a source of technical expertise for questions on security inspections at licensed reactors and within the national and international community.
- f. Provides NSIR inspection resources to support region-led inspections at decommissioning power reactors.
- g. Identifies any special inspection resources necessary to resolve technical or regulatory issues for inclusion into security inspection plans.
- h. Interfaces with the regions and other offices regarding coordination of inspections, event/incident response, licensee performance assessment, and implementation of security inspections at decommissioning power reactors.
- i. Develops inspection program policies and procedures with respect to security at decommissioning power reactors.

05.04 Deputy Director, DSO, NSIR

- a. Directs the implementation of the security oversight process for decommissioning nuclear power reactors.
- b. Assures that security-related inspection program documents conform to IMC 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual."
- c. Directs the periodic assessment of security inspection program effectiveness to meet agency performance goals.
- d. Assesses and evaluates regional and headquarters implementation of the security inspection program. Recommends to the Director of NMSS/DUWP any security-related program change that may enhance security at decommissioning power reactors.
- e. Implements other security inspection program duties as directed by the Director, DSO.

05.05 Regional Administrator

- a. In concert with headquarters, directs the implementation of the inspection program for decommissioning power reactors.

- b. Ensures, within budget limitations, that the regional office staff includes an adequate number of inspectors in the security discipline to carry out the security inspection program as described in this chapter.
- c. Applies inspection resources, as necessary, to deal with issues and problems that arise as specific facilities undergoing decommissioning.

2202-06 DECOMMISSIONING SECURITY INSPECTION PROGRAM

06.01 Program Discussion

Security program inspections at decommissioning reactors are an integral part of the overall decommissioning inspection program as described in IMC 2561, "Decommissioning Power Reactor Inspection Program," and consist of security core inspections and discretionary security inspections.

The security decommissioning inspection program focuses on ensuring that:

- a. A licensee is meeting applicable regulatory requirements as delineated in 10 CFR Part 73.
- b. NRC staff projected oversight and security inspection resources are effective, consistent, and appropriately applied.
- c. Licensee activities for decommissioning maintain assurance that security controls are maintained for the spent fuel pool.

The security inspection program for decommissioning nuclear power reactors is comprised of two major program elements: (1) security core inspections; and (2) security discretionary inspections. The applicable security core inspection program element, detailed in Appendix A to this IMC, is to be performed, at the discretion of the inspector, at all decommissioning nuclear power reactors. If a decommissioning nuclear power reactor is co-located with an operating nuclear power reactor, the Reactor Oversight Program baseline security inspection program will satisfy inspection requirements for the decommissioning nuclear power reactor.

The security core inspection program (IMC 2202, Appendix A) is one of several inputs into the overall assessment of licensee performance and is designed to provide assurance that security at licensed facilities is maintained in a manner that contributes to the protection of public health and safety and promotes the common defense. Inspection procedures listed in Appendix A, Attachment 2, "Security Core Inspection Procedures and Estimated Resources," will be reviewed by both headquarters and regional staff and revised by headquarters, as necessary, to enhance the program for the early identification of any decommissioning safety and security problem.

The security discretionary portion of the inspection program (IMC 2202, Appendix B) provides diagnostic inspections of identified problems, issues and events beyond the security core inspection program, if issues are of more than very low significance. Security discretionary inspections are planned in response to security issues that require additional evaluation and assessment as determined by the traditional enforcement process.

06.02 Program Documents

Assessment of licensees' performance in security is governed by the following inspection manual documents:

- a. IMC 2561, "Decommissioning Power Reactor Inspection Program,"
- b. IMC 2202, "Security Inspection Program for Decommissioning Nuclear Power Reactors,"
- c. IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports," and
- d. NRC Enforcement Policy.

2202-07 SECURITY INSPECTION PROGRAM ELEMENTS

The inspection program described in this chapter is comprised of the following two program elements:

- Security Core Inspections.
- Security Discretionary Inspections.

Overall, the inspection program emphasizes achieving a balanced look at a cross section of licensee activities important to the security of licensed materials with resources assigned to each area based on each area's relative importance to meeting the objectives of this IMC. The inspection program also provides for the agency's response to security events or occurrences. The guidance for determining the level of response to an event or occurrence is contained in NRC Management Directive (MD) 8.3, "NRC Incident Investigation Program."

Security information designation guidance will be adhered to for all inspection reports, temporary instructions (TIs), orders, etc., that contain or have the potential to contain safeguards information (SGI) or sensitive unclassified non-safeguards information (SUNSI). These documents shall be marked and controlled in accordance with NRC MD Volume 12, "Security" or agency SUNSI guidance which is located at: <http://www.internal.nrc.gov/policy/directives/catalog/md12.6.pdf>

07.01 Security Core Inspections

The security core inspection program element described in IMC 2202, Appendix A, is to be performed at all NRC decommissioning power reactor licensees subject to 10 CFR Part 73 requirements.

The security core inspection program provides the minimum examination of the facilities, licensee activities, and licensee programs and procedures to determine whether licensees are meeting applicable regulatory requirements. Security core inspections also identify indications of performance problems to allow further engagement by the NRC before a licensee's performance deteriorates to an unacceptable level.

The security core inspection program (those elements performed at the discretion of the inspector) constitutes an appropriate minimum level of inspection at NRC-licensed decommissioning power reactors whose overall performance is adequate based on historical and current NRC inspection activities. For licensees whose performance results in violations involving escalated enforcement actions, e.g., a severity level I, II or III infraction, additional plant-specific security discretionary inspections are performed.

The inspection frequency for each inspectable area is based on security insights. Security core inspection procedures should be completed at every plant at the prescribed interval, including as-needed procedures, e.g., transportation of irradiated fuel. In certain cases, completion of some inspection requirements may be accomplished through other inspections, such as TIs (Section 07.03 below). Specific procedures listed in IMC 2202, Appendix A, and its supplements provide estimates of hours associated with each inspection procedure for overall resource planning purposes only. Effort hours identified in the resource estimate section of an inspection procedure do not represent a precise measure for completion of the procedure.

07.02 Facility Specific Security Discretionary Inspections

The security discretionary inspection element of the inspection program (IMC 2202, Appendix B) is designed to apply NRC inspection assets in an increasing manner when performance issues of significance are identified, based on the severity level of inspection findings (with the application of the Traditional Enforcement Process). Accordingly, the responsible NRC regional office will assess the need for security discretionary inspections after identifying and evaluating any inspection finding that is greater than Severity Level IV.

The depth and breadth of specific discretionary inspections chosen for implementation will depend upon the risk characterization of the issue, severity of the occurrence, or particular threat condition. A security discretionary inspection will be performed for all severity level I, II or III issues associated with inspection findings.

Depending on the significance of the identified performance issue, security discretionary inspections provide a graded response, which includes, but is not limited to: (1) oversight of the licensee's root-cause analysis of the issue; (2) expansion of the security core inspection sample; or (3) a focused team inspection (as necessary to evaluate extent of condition). Any new issue identified during a security discretionary inspection will be evaluated by the inspector, in accordance with the NRC Enforcement Policy, and reviewed by management.

07.03 Related Inspection Activities.

All inspection activities, as well as violations reported by the licensee, provides input to the reactor program system (RPS), which the staff uses to monitor and assess facility performance. The staff should periodically review RPS and adjust inspections to reflect inspection findings or changes in plant status and decommissioning activities. During these periodic reviews, regional management should take the lead (with headquarters involvement) in the assessment of decommissioning licensee performance and use these insights as a possible justification to change the inspection plan (i.e., increased or decreased inspection effort, schedule changes, or deletions).

08.01 General

Inspections described in Appendices A and B of this IMC are intended to provide a framework for managing inspection resources without being overly prescriptive. At the same time, a level of inspection necessary to complete pre-defined objectives at each licensed facility is specified. It is intended to place inspection emphasis on elements based on their relative importance to security.

The inspection program requires that inspectors and their managers evaluate problems to determine if follow-up inspections are necessary to diagnose whether a significant concern represents an isolated case or may signify a broader, more serious problem based on the evaluated significance of the issue. Licensee management controls (e.g., security quality assurance and oversight) may need to be examined to determine whether weaknesses in these controls contributed to an identified concern.

The NRC inspection program covers regulatory requirements of licensee activities in any particular area. The inspector should choose a sample of inspection requirements, specified in the inspection procedures that are based on the relative importance of the area covered by the procedure to other areas inspected by the program. Inspection requirements chosen should direct the inspector to the most important performance-based aspects of the area being inspected, commensurate with estimated resources.

08.02 Completion of Inspection Procedures

Security core inspection procedures represent inspection requirements necessary to assess licensee performance. The inspector should perform a minimum of 50 percent of applicable inspection requirements in each inspectable area within the security core inspection procedures. Any deviation will be coordinated beforehand with the appropriate program office.

The total number of inspection requirements specified in an inspection procedure is used to indicate the relative completion of the procedure. However, if the inspector has met the objectives of a procedure without performing every inspection requirement (e.g., an activity to be observed is not performed by the licensee during the inspection, or the complexity of significant findings [i.e., potentially greater than Severity Level IV] prevents the inspector from completing all requirements), then the inspector can consider the procedure completed in full.

08.03 Program Feedback

The security inspection program is expected to be dynamic and to respond to changes in the threat environment and experience. Therefore, NSIR expects that the regions and inspectors may identify potential problems in implementing this inspection program. However, NSIR expects any potential problem to be resolved at the appropriate NRC regional management level and any recommended change to the program should be submitted to NSIR for consideration as necessary. Any such feedback or recommendation should be submitted utilizing the inspection feedback process (IMC 0801, Inspection Program Feedback Process) through the associated regional office.

2202-09 INSPECTION PLANS

Regional offices should develop annual site-specific inspection plans consistent with the program and the inspection planning module of RPS, which assists in managing inspection resources and monitoring inspection program completion. Under circumstances where the decommissioning of multiple units at a site is not comparable, the inspection plan should be specific for each unit. The regional inspection plan (i.e., the integration of individual site or unit plans) should project the planned inspection activities and available resources for all licensee facilities at the periodicity prescribed by the program offices of NSIR, NMSS and/or Nuclear Reactor Regulation (NRR) as applicable. The plan should also provide for a summary of the fraction of regional resources allocated to each of the individual program elements discussed in paragraph 2200-07 of this chapter.

Planning significant alterations to the security core inspection program for a licensee to accommodate a licensee's particular situation requires the concurrence of the Deputy Director, DSO, NSIR. Significant alterations include treating a multi-unit site as separate single-unit sites, or increasing or decreasing the frequency of inspections or significant deviations in inspection requirements from those stated in security core inspection procedures. Factors to consider when planning alterations to the security core inspection program include: (1) known licensed activities, (2) the facility size, design, and age, and (3) complexity of the licensee's programs. For decommissioning plants, it is expected that results of recent and current violations would be used to schedule security core inspections and to determine the amount and focus of planned discretionary inspections at each site. The basis for the allocation or significant reallocation of resources among the sites will be documented. It is expected that the inspection plans will be living documents and be reviewed periodically, adjusted, and reissued to reflect shifts in plant performance and safety or security concerns. Regional inspection plans should be reviewed by regional management and updated at least semiannually.

2202-10 INSPECTORS

See IMC 2561 for information on Decommissioning, Regional and Headquarters Inspectors.

2202-11 BASIC INSPECTION PROCESS

See IMC 2561 for guidance on Basic Inspection Process.

END

Appendices:

- A. Security Core Inspection Program
- B. Security Discretionary Inspection Program

ATTACHMENT 1- Revision History for IMC 2202

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Changes	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession No. (Pre-Decisional, Non-Public Information)
	ML13234A269 08/27/14 CN14-019	Initial issuance for decommissioning reactors. Have researched commitments for the last 4 years and found none.	N/A	ML14164A050
	ML20034D470 07/28/20 CN 20-035	Revised to make procedure publicly available and made format changes.	N/A	ML20034D467