

SECURITY CORE INSPECTION PROGRAM

2202A-01 PURPOSE

This appendix is provided to identify inspectable areas and applicable security core inspection procedures of the security core inspection program. The security core inspection program is one of several inputs into the overall assessment of licensee performance that contributes to the assurance of protection of public health and safety and security at decommissioning nuclear power reactors.

2202A-02 OBJECTIVES

02.01 This security core inspection program is part of the U.S. Nuclear Regulatory Commission's (NRC's) security decommissioning inspection program to assess the security performance of decommissioning nuclear power reactor licensees subject to the requirements of Title 10 of the *Code of Federal Regulations Part 73* (10 CFR Part 73), and NRC imposed requirements, such as orders.

The objectives of the security core inspection program are:

1. to gather sufficient, factual inspection information to determine whether the licensee's security programs are meeting regulatory requirements and can protect against the design basis threat (DBT) of spent fuel sabotage, and the theft or loss of special nuclear material (SNM);
2. to determine the effectiveness of the licensee's ability to identify, assess the significance of, and correct security issues commensurate with the significance of the issue;
3. to determine whether the licensee, in conjunction with established protocols with external agencies, is capable of deterring and protecting against the DBT of spent fuel sabotage and theft or diversion of SNM;
4. to verify and assess overall security performance of decommissioning power reactors through onsite inspections;
5. to provide a mechanism for the NRC to remain cognizant of security status and conditions at decommissioning nuclear power reactors; and

6. to identify those significant issues that may have generic applicability to the safe and secure operation of decommissioning nuclear power reactor facilities subject to the requirements of 10 CFR Part 73.

2202A-03 APPLICABILITY

This inspection manual chapter (IMC) appendix is applicable to all decommissioning nuclear power reactor licensees subject to the requirements of 10 CFR Part 73. The program requirements identified within this document apply to all NRC offices and personnel who are tasked with inspection and oversight of security performance at decommissioning nuclear power reactors licensed by the NRC.

2202A-04 SCOPE

Security core inspections provide a sufficient examination of licensee activities in order to monitor licensee performance, meet the objectives identified above, and to assure that licensees' security programs are meeting applicable regulatory requirements.

2204A-05 RESOURCES

05.01 Security core inspection procedures define the effort and requirements necessary to obtain an adequate assessment of an inspectable area. For resource planning purposes, each security core inspection procedure includes an estimate of the average inspection hours necessary to complete the procedure. These estimates are not goals, standards, or limitations; rather, they are included to assist in planning resource allocations and will be revised periodically, based on experience. It is expected that the actual hours required to complete an individual inspection procedure at a particular plant will vary from the estimate. See IMC 2202, Section 08.02, for additional discussion.

05.02 The Office of Nuclear Security and Incident Response (NSIR) provides regional offices with a band of expected effort (approximately plus or minus 10 percent) for each security core inspection procedure per site as a process control. Regional management is expected to review those situations when inspection efforts fall outside of control bands for possible programmatic insights and recommended changes to the program.

2202A-06 PHILOSOPHY OF THE SECURITY CORE INSPECTION PROGRAM

The security core inspection program provides indication of licensee performance with respect to physical protection and material control and accounting. The program was developed utilizing risk insights, and lessons learned to determine a comprehensive list of areas to inspect that would ensure public health, safety and security at decommissioning nuclear power reactors

The assessment of plant performance is supported by information maintained within the reactor program system (RPS).

2202A-07 DESCRIPTION OF SECURITY CORE INSPECTION PROGRAM

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 (i.e., reactive and initiative inspections).

2202A-08 ASSESSING INSPECTION FINDINGS

08.01 The traditional enforcement process, as described in the NRC Enforcement Policy, is used for determining the security significance of inspection findings and security-related events at decommissioning nuclear power reactors.

08.02 The significance of security inspection findings for decommissioning nuclear power reactors will be described in inspection reports and their cover letters, as specified in IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports." Findings (a redacted description) will also be entered into RPS for tracking. This redacted description will not become available to the public through the Agency wide Documents Access and Management System public website, but will be available to internal NRC users. The existence of a security finding will be displayed on the public website, but will only be characterized as either Severity Level IV or greater-than-Severity Level IV. Inspectors should still provide the specific significance of a finding when making a Plant Issue Matrix (PIM) entry, but the public website will generically display all greater-than-Severity Level IV findings in blue, to withhold the specific significance. In accordance with current agency policy, no other information or details related to security findings will be displayed on the public website. No safeguards information (SGI) should be entered into the PIM. For findings where a full description would require disclosure of SGI, the issue should be described broadly in the PIM at the sensitive, unclassified, non-safeguards information (SUNSI) security-related information level and not include SGI.

2202A-09 DOCUMENTING INSPECTIONS

The purpose of reporting results of inspections is to document the scope of inspections and any substantive findings in support of the assessment process. Inspections will be documented in accordance with guidance and requirements in IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports."

Security designation requirements will be adhered to for all inspection reports, temporary instructions, orders, etc., that contain or have the potential to contain SGI. These documents shall be marked and controlled in accordance with NRC's Management Directive, Volume 12, "Security." If the document does not contain SGI, but does contain security-related information

about a specific site or event, then the document will be designated as Official Use Only Security - Related Information in accordance with agency requirements for SUNSI. SUNSI requirements are found at the following web address:

<http://www.internal.nrc.gov/ois/divisions/irids/sunsi/index.html>

2202A-10 INSPECTION PLANNING

Inspection starts with the planning of core and discretionary inspections in RPS. Planning also includes the coordination of site visits and inspections to promote regulatory efficiency and effectiveness and to reduce regulatory burden on the licensee. Then, inspections are conducted, inspection reports are written, license performance is assessed, feedback on the decommissioning inspection program should occur, and this process should repeat until the site completes decommissioning activities.

a. Annual Inspection Planning.

See Attachment 2 to this appendix and IMC 2202 for additional guidance.

b. Region-Based Inspection Planning.

See IMC 2202 for additional information.

c. Level of effort.

See IMC 2202 for additional information.

d. Adjustments.

See IMC 2202 for additional information.

e. Completion status.

See IMC 2202 for additional information.

END

Attachments:

1. Inspectable Area Table
2. Resource Estimate Table
3. Revision History for IMC 2202, Appendix A

ATTACHMENT 1

INSPECTABLE AREAS WITHIN THE SECURITY CORE INSPECTION PROGRAM

The security core inspection program requires the inspectable areas below be reviewed at each NRC-licensed decommissioning power reactor site. Inspectable areas verify aspects of key attributes of the security decommissioning inspection program.

Inspectable Area (note 1)
Access Authorization Program
Access Control Program
Equipment Performance, Testing and Maintenance
Protective Strategy Evaluation
Protection of Safeguards Information
Security Training
Fitness For Duty
Cyber Security
Materials Control and Accounting
Review of Decommissioning Reactor Target Sets

Note 1: Temporary instructions will be utilized, as required, to supplement and/or augment the security core inspection program.

ATTACHMENT 2

SECURITY CORE INSPECTION PROCEDURES AND ESTIMATED RESOURCES

Inspection Procedure No.	Security for Decommissioning Nuclear Power Reactors - Specific ¹ (Title)	Freq. ²	Annualized Estimated Resources ³
81200.01	Access Authorization	T	8
81200.02	Access Control	A	24
81200.04	Equipment Performance, Testing and Maintenance	B	18
81200.05	Protective Strategy Evaluation and Performance and Evaluation Program	T	27
81200.06	Protection of Safeguards Information	T	2
81200.07	Security Training	B	13
81200.08	Fitness For Duty	TBD	TBD
81200.10	Cyber Security	TBD	TBD
81200.11	Materials Control and Accounting	TBD	TBD
81200.14	Review of Decommissioning Reactor Target Sets	T	3
Security (Specific) Core Inspection Sub-Total ⁴			95

Security Core Inspection Program-Annualized Grand Total⁴ 95 hours

1. Inspection budget funded by NSIR.
2. A = annual, B = biennial, T = triennial, AN = as needed. See IMC 2202 for definitions.
3. Direct Inspection Effort (hours).
4. Total does not include resident inspector activities that are not considered direct inspection effort. For the interim, inspection budget allocation for these inspections will be funded in part by NMSS, NSIR and NRR as applicable.

ATTACHMENT 3 - Revision History for IMC 2202, Appendix A

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)
	ML13234A279 08/27/14 CN 14-019	Initial issuance researched commitments last 4 years found none.	N/A	ML14164A080
	ML20050M649 07/28/20 CN 20-035	Revised to make procedure publicly available and made format changes.	N/A	ML20050M653