

ATTACHMENT 71130.04

INSPECTABLE AREA: Security Plan Changes

CORNERSTONE: Physical Protection

INSPECTION BASES: Completing this inspection program element provides reasonable assurance that the reported plan changes do not reduce the effectiveness of the previous plan in accordance with the requirements of 10 CFR 50.54 (p). Failure of this program can compromise the licensee's ability to protect against the Design Basis Threat (DBT) of radiological sabotage. Changes to basic security plans that could result in reduction in the effectiveness the security plan(s) require an amendment to the plan be submitted to and approved by the NRC in accordance with 10 CFR 50.90.

LEVEL OF EFFORT: Inspections of changes to Security Plan, Guard Training and Qualification Plan and Contingency Response Plan are conducted as they are reported to the NRC. For inspection program assessment and planning purposes, this procedure will be completed each two years.

711130.04-01 INSPECTION OBJECTIVE

01.01 To develop inspection data that provides independent evaluation of the significance of security plan and program changes. Verify whether changes to the licensee's security plans and attendant implementing procedures have not decreased the effectiveness of the previous plan, as required by 10 CFR 50.54(p).

711130.04-02 INSPECTION REQUIREMENTS

02.01 Review Physical Protection Plan Changes

Changes to approved security plans which do not decrease the effectiveness of the plans are required to be reported to the NRC within two months of making the changes.

- a. Review each reported security plan, contingency plan, and training and qualification plan change to verify that the change does not reduce the effectiveness of the previous plan.
- b. When necessary, evaluate the licensee's supporting information that demonstrates that the change(s) did not decrease the effectiveness of the previous plan.

- c. Review the change(s) to determine whether other elements of the safeguards program have been impacted. Additionally, reviews of plan changes made by licensees who have plants in multiple regions should coordinate their review or evaluation with physical security staff assigned to those other regions.
- d. Conduct independent observations or in-depth reviews of the implementation of only those changes that appear to decrease the effectiveness of the previous plan.

02.02 Conducting the Inspection

- a. Each safeguards related plan change should be screened and/or reviewed in the office within 30 days of receipt. Some in-depth reviews may take longer to complete than 30 days after receipt.
- b. Changes which appear to affect the ability of the safeguards program to protect against the DBT of radiological sabotage should receive review priority.
- c. Determine whether the plan change was documented and reported to the NRC within two months as required.
- d. Verify that the licensee obtained NRC approval prior to implementing plan changes that decrease the effectiveness of the plans as required by 10 CFR 50.54 (p)(1).

02.03 Identification and Resolution of Problems. Verify that the licensee is identifying problems related to security plan changes at an appropriate threshold and entering the problems in the corrective action program. Verify that the licensee has appropriately resolved the concerns and regulatory requirements for a selected sample of problems associated with plan changes. See Inspection Procedure 71152, "Identification and Resolution of Problems," for additional guidance.

711130.04-03 RESOURCE ESTIMATE

Between 14 to 18 hours of inspection effort are allocated biennially for this inspection procedure. Sample size is one plan change review per inspection. Total sample size is contingent upon the number of 50.54(p) plan changes submitted by each licensee.

END