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UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555-0001

December 30, 2005

NRC INFORMATION NOTICE 2005-33: MANAGING THE SAFETY/SECURITY
INTERFACE

ADDRESSEES

All holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

PURPOSE

The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice to remind licensees of the need to prevent unintended degradation of plant security by routine plant operations, design changes, or maintenance, and conversely to prevent unintended degradation of plant safety by analogous security activities. It is expected that recipients will review this information for applicability to their facilities and consider actions, as appropriate. However, suggestions contained in this information notice do not constitute NRC requirements and, therefore, no specific action or written response is required.

BACKGROUND

In addition to the security enhancements instituted by order at nuclear reactor sites subsequent to September 11, 2001, the NRC has considered whether specific measures are needed to manage the potential for adverse interactions to occur between operational safety and site security when changes are made to plant configurations, facility conditions, or security postures. The current regulations require nuclear power plant licensees to establish and maintain NRC-approved physical security plans which provide for high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not pose an unreasonable risk to public health and safety (Section 73.55a of Title 10 of the *Code of Federal Regulations* (10 CFR 73.55(a)), and to make no changes to these plans that could decrease their effectiveness without prior NRC approval (10 CFR 50.54(p)(1)). Similarly, 10 CFR 50.59 allows licensees to make changes to their facility or procedures as described in their final safety analysis reports without prior NRC approval provided that certain criteria are met. Additionally, 10 CFR 50.65(a)(4) requires that licensees assess and manage the increase in risk that may result from proposed maintenance activities.

These regulations do not explicitly address the need to prevent unintended degradation of plant security and/or safety as a result of routine plant operations, design changes, or maintenance. The NRC staff is currently considering new rulemaking to address this issue.

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DESCRIPTION OF CIRCUMSTANCES

The NRC staff has become aware of several cases in which actions taken by operations, maintenance, or security personnel were not promptly and effectively communicated to other potentially affected organizations and had the potential to result in adverse effects on plant safety or security.

Examples of security activities that had the potential to adversely impact safe plant operations include: security force staffing changes on backshifts, weekends, and holidays that could adversely impact operations during plant events or emergencies (e.g., opening and securing vital area access doors to allow operations personnel timely access to safety-related equipment) and the installation of security equipment that interferes with plant operations (e.g., placement of a security fence that blocks the pressure relief blowout panel for the turbine driven auxiliary feed water system, installation of security delay fencing with razor wire preventing access to plant fire hydrants).

Examples of operational activities that had the potential to adversely impact security include: physical barrier breaches during maintenance activities (e.g., removed ventilation fans or other equipment from vital area boundary walls without taking compensatory measures to prevent unauthorized access), blockage of fields of fire from bullet-resisting enclosures (or other defensive firing positions), placement of scaffolding and other temporary equipment without due consideration of the impact on security response pathways and the potential for unauthorized access, and the staging of temporary equipment within security isolation zones.

DISCUSSION

The goal of maintaining effective oversight of the safety/security interface is to ensure that the risk of adverse effects on safety and security are effectively managed before changes are made to plant configurations, facility conditions, or security.

When licensees identify circumstances that may involve an adverse safety/security interface, they should consider whether compensatory and/or mitigative actions are needed to maintain safety and security consistent with applicable NRC regulations, requirements, and license conditions. Licensees' evaluations of such changes must ensure the protection of public health and safety, and the promotion of the common defense and security.

CONTACT

This information notice requires no specific action or written response. Please direct any questions about this matter to the technical contact listed below or the appropriate Office of Nuclear Reactor Regulation project manager.

/RA by HNieh for/

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Note: NRC generic communications may be found on the NRC public Web site, <http://www.nrc.gov>, under Electronic Reading Room/Document Collections.

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