

From: <gregb@hyperusa.com>
To: <NRCREP@nrc.gov>
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Subject: comments on DG5019

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I wish to offer the following comments on the subject draft guideline.

Thank you.

Greg Bell

DG-5019 Comments

Not specific to the guideline, however, are NRC security related documents posted on the NRC's protected website? If so, how does one gain access?

General question – will this guideline supersede all previous guidance regarding the reporting of security events?

General comment – regarding events that are reportable upon discovery vs events that are reportable following an evaluation/assessment, clarify when the reportability clock starts for the various events.

General comment – this guidance relies upon the new regulation therefore, the new regulation should be in place before this guidance put into use.

Section 2.2 page 7, example 2: broaden or remove the examples, appears to limit the scope of device.

Section 2.3, page 8, example 5: the proposed regulation specifies “any failure...” without regard for compensation is reportable; the guidance appears to be setting a condition that is not consistent with that rulemaking.

Define and consistently use “safeguards system;” seems to be randomly interchanged with security system and security safeguards system.

Without additional clarification, the second bullet for example (2) in section 2.4 on page 10, appears to be bounded by the criteria in section 2.2, example (2).

Section 3.2, page 17, last bullet before 3.3: “discovery of contraband material outside the protected area...” since there are many states that permit firearms to be carried in an individual's vehicle, this could become a burden or a least cause a dramatic increase in the number of logged events. Recommend dropping is example. Besides, as currently described, contraband is specific to the protected area.

Section 4.1.1 page 19, item 5: recommend dropping this item; appears to be covered in section 4.2, “dual reporting.”

Glossary item Contraband – provide cross-references(s) to the regulations that list these banned materials. The opening statement in this definition is nebulous at best and is far too open to interpretation. Or recommend deletion of “materials banned from the protected area by

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security regulations.”

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