

NEI 11-08 [Revision 0]

Summary of Comments on NEI 11-08 June 2012

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Guidance on Submitting Security Plan Changes

June 2012

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NEI 11-08 [Revision 0]

Nuclear Energy Institute

**Guidance on Submitting
Security Plan Changes**

June 2012

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ACKNOWLEDGEMENTS

This document, Guidance for Submitting Security Plan Changes, NEI 11-08 was developed in a joint effort by NEI, NRC, and industry members of the Rulemaking Task Force who possess a broad range of experience in security and regulatory matters. NEI wishes to acknowledge the extensive review and comment by these industry members and personnel who shaped the final form of this document.

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EXECUTIVE SUMMARY

Nuclear Energy Institute (NEI) is issuing this guidance to provide information for licensees to consider when making a determination relative to the appropriate licensing action under which change(s) to the security plans required under the provisions of 10 CFR Part 50, sections 50.34(c) and 50.34(d), can be made. The required security plans consist of the Physical security Plan (PSP), Training and Qualification Plan (T&QP), Safeguards Contingency Plan (SCP), and the Cyber Security Plan (CSP). This guidance is intended to assist the licensee in determining the appropriate licensing action for a specific security plan change and the types of information that should be identified, reviewed, and analyzed to support the determination or conclusion that the security plan change meets the provisions of 10 CFR 50.90 or 50.54(p), prior to submitting the security plan to the U.S. Nuclear Regulatory Commission (NRC). However, the guidance contained within this document does not determine for the licensee whether a 50.90 or a 50.54(p) is the appropriate licensing action. The licensee is responsible for making the final determination for what type of licensing action is submitted to the NRC for each plan change made.

- a. Licensees who submit a security plan change that would decrease the safeguards effectiveness of the PSP, T&QP, CSP, and/or SCP must submit an application for licensee amendment to the NRC for review and approval prior to implementing the security plan change in accordance with 10 CFR 50.90.
- b. Licensees who submit a security plan change that does not decrease the safeguards effectiveness of the PSP, T&QP, CSP, and/or SCP are required to submit a report containing a description of each security plan change within two months after the security plan change is implemented at the site, in accordance with 10 CFR 50.54(p)(2).

This guidance provides analytical concepts and technical information that can be applied to all proposed security plan changes. ~~The examples provided by this guidance and Attachment 1, apply these concepts to the types of information that should be considered by licensees who choose to utilize ROWS technology as a component of their site protective strategy.~~

In November 2011, the NRC endorsed Revision 7 of NEI 03-12 "Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent spent Fuel Storage Installation Security Program]," dated October 2011, hereafter referred to as the "Security Plan Template." Revision 7 of the Security Plan Template contains generic language that, if applicable to the site-specific conditions, may be used by licensees choosing to implement ROWS as part of the site protective strategy. In addition to the generic language for ROWS provided in Revision 7 of the Security Plan Template, the licensee should also consider appropriate changes to the site CSP relative to the digital/cyber based features of ROWS. Regardless of the nature of the plan change the licensee makes, it is the responsibility of the licensee to ensure that all security plan changes are consistent with regulatory requirements and are described in the security plans. Where the generic language contained in the Security Plan Template is not applicable or does not adequately describe site-specific conditions, the licensee

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should consider providing appropriate site-specific information to the security plan to ensure that the nature of the plan change is clearly described and how implementation of the security plan change will satisfy regulatory requirements.

For those licensees who are considering a security plan change that will reduce the staffing levels for armed responders (AR) and/or armed security officers (ASO), or will add, modify, or remove a security measure, the licensee must provide information that is sufficient to understand the nature of the change, the impacts that the change will have on the licensee's security program, and the impact that the change will have on the continued ability of the licensee to meet regulatory and security plan requirements. Licensees should identify in their security plan change submittal, the purpose for the plan change, supporting information gained through the analysis conducted, and description/explanation of how the plan change (i.e., reduction in staffing levels or removal of a security measure associated with ROWS) does not reduce the safeguards effectiveness of the security plan(s). The submitted plan change should describe how actions required by the site protective strategy continue to be accomplished in conjunction with explaining how the reduction in staffing levels or removal of security measures continues to meet the requirements of 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage" and other security plan requirements.

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GUIDANCE ON SUBMITTING SECURITY PLAN CHANGES

1 SECURITY PLAN CHANGE ITEMS TO CONSIDER

A thorough review and analysis is necessary for each security plan change. Changes made to one section of a security plan may impact other sections of the security plan/plans, and/or the licensee's continued ability to meet regulatory and security plan requirements. It is necessary that each licensee identify impacts through review and analysis to determine if a reduction of safeguards effectiveness is realized in other areas of the security program not specifically being addressed by the security plan change.

The licensee should identify and consider the impacts that a change in strategy will ultimately have on existing site security programs and whether those programs continue to meet security plan and regulatory requirements. The licensee should provide as part of the security plan change submittal, an evaluation of the identified impacts to site security programs and an explanation of how these programs continue to meet regulatory and security plan requirements.

Regardless of the licensing action that is determined to be appropriate for a given plan change, the licensee should provide, as part of the security plan change submittal package, a detailed explanation of what the plan change is trying to accomplish and the rationale supporting the licensee's conclusion that the licensing action taken is appropriate.

If the intent is to remain within the requirements of a 50.54(p), the licensee should provide a detailed explanation of what has been changed and how it does not decrease in the safeguards effectiveness of the security plan. For example, in the case of ROWS, items to consider include, but not limited to: 1) describe how a reduction in staffing levels and/or addition, modification or removal of a site security measure, does not reduce the effectiveness of the security plan or protective strategy, including how the functions that were previously required are absorbed, modified or no longer required, 2) in regards to staffing level reductions, whether the change involves a reduction in Armed Responders, Armed Security Officers, or both, and; 3) the licensee should explain as part of the security plan change submittal, how the security plan change continues to provide high assurance through the effective implementation of the security plans and site protective strategy.

Where a licensee intends to make security plan changes such as the installation of new equipment (i.e., ROWS) the following areas or types of information should be identified, reviewed, and analyzed for impacts to determine the appropriate licensing action and a summary of the analysis should be included to support the licensee's conclusion.

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1.1 ANALYZE CHANGE

- a. Identify the nature of the security plan change being made (e.g., installation or removal of equipment only; installation or removal of equipment with strategy changes; installation or removal of equipment with other physical changes; installation or removal of equipment with procedural changes; adding or subtracting responders; etc.)
- b. Identify and analyze impacts: The licensee should review and analyze all program areas to identify the impact the security plan change will have to related security program components, equipment, personnel and/or implementing procedures. Where impacts are identified, the licensee should ensure that appropriate corresponding changes are made to the affected security plans and procedures to account for the identified impacts, and to verify the continued ability to meet security plan and regulatory requirements in all program areas. If personnel are being moved or reduced, identify the functions that are or were performed by each position to ensure that all previously assigned functions are accounted for and can be effectively performed whether directly or indirectly related to the specific change being made. Where functions must be re-assigned, the licensee should also review and analyze the impact that this additional change will have on the affected program area or position.
- c. Summarize the analysis: The licensee should summarize the methodology used to review and analyze the change and explain the rationale supporting the basis for conclusions made. For example: The licensee installs a new physical barrier designed to funnel personnel to a designated area. The licensee re-locates one AR to the east to cover the funneling channel created by the new barrier and a camera is installed for surveillance of the new barrier. The AR was previously assigned to provide surveillance of an area to the west of the previous position concurrent with surveillance by an ASO positioned further to the west. This function is now reassigned to an ASO. The strategy is impacted because now only the ASO is able to engage in that area, however, the new barrier will force the adversary movement to the east along the funneling channel where the AR will engage.
- d. Compensatory measures: Identify what compensatory measures would be taken upon loss of the new equipment. Can compensatory measures be taken within appropriate time-lines and are new staffing numbers sufficient to support compensatory measures? If personnel staffing levels are reduced, are sufficient numbers of armed personnel available to ensure that all security plan and regulatory requirements are met for all other program areas to include when compensatory measures are used?
- e. The licensee should consider, as part of the review and/or analysis process, the licensing basis established by the licensee's Final Safety Analysis report consistent with the requirements of 10 CFR 50.59, 50.90, and 50.54(p), to ensure that the licensing basis is maintained. This determination can have a direct impact on the licensee's final determination regarding the appropriate type of licensing action to be

taken for the specific security plan change being considered/made. For example, licensees planning to implement ROWS should identify and analyze potential consequences to both on-site and off-site equipment, structures, and personnel.

- f. Describe how regulatory compliance, plan commitments, implementing procedures, and daily functions are maintained throughout incorporation of the change. For example; has the licensee performed a vehicle bomb blast analysis that considers the location of the new equipment as well as required personnel to ensure that the loss of the new equipment and specified personnel does not prevent an effective response?

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2 SECURITY PLAN CHANGE EVALUATION CRITERIA

The following information should be considered by the licensee when reviewing and analyzing a security plan change. Although these items are not all inclusive, they provide a general overview of the specific types of information that should be considered when conducting a security plan change review and analysis, as well as what information should be included in the written security plan change submittal package. The licensee should provide as part of the security plan change submittal, in-depth information and explanation of impact that the plan changes have on the safeguards effectiveness of the security plans. For example, those licensees who are considering a plan change specific to the implementation of ROWS, such as a reduction in staffing levels, the licensee should provide an in-depth explanation for how the specific functions that were previously performed by personnel are now being performed by the ROWS and/or are re-assigned to other personnel. The review and analysis process should consider, but is not limited to the following:

1. Review the change against all requirements contained in 10 CFR 73.55. Pay particular attention to unintended impacts to the regulation. For example, will removing a fence impact the access control requirements as stated in the rule? Will a reduction in responder numbers adversely impact the ability to perform functions necessary for OCA vehicle checkpoint operations?
 - Protective strategy (e.g. minimum number of armed personnel, timelines, equipment or systems necessary to prevent significant core damage and spent fuel sabotage),
 - Blast analysis; determine the minimum stand-off distance and location of the vehicle barrier system to include the protection of ROWS hardware, ROWS supporting structures, ROWS operators, and personnel or equipment used to compensate for inoperable ROWS.
 - ROWS operator's normal duties, as well as actions, capabilities, and timelines, etc., in the event that the ROWS become inoperable during a contingency event.
 - Access control measures used to control access to the various ROWS operator controls.
 - Testing and Maintenance of ROWS to include test firing from a representative facsimile using both stationary and moving targets.
2. Review the change against all security plans and regulatory requirements to determine potential impacts across the document to include all appendices. If impacts are realized, determine if a reduction of safeguards effectiveness exists.
3. Review the security plan change against the requirements of 10 CFR 73.58, "Safety/Security Interface Requirements for Nuclear Power Reactors."
 - Locations of the ROWS systems, ensuring ROWS does not have a negative impact on plant equipment and operations.

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- Type of safety measures or inherent safety features to minimize the potential for the ROWS to inadvertently transition to the firing mode or have an unintentional discharge.
 - ROWS fields of fire include lateral and elevation limitations that ensure safety components at the site are not adversely affected during the initiation of the protective strategy and firing of ROWS mounted weapons.
 - ROWS vendors' commitment to safety features and controls recommended by Interagency ROWS Working Group (IROWS).
4. Evaluation of compensatory measures for new equipment that is being committed to in the security plan. The licensee should determine that the compensatory measures that would be instituted for loss of new equipment do not have an adverse impact on: a) the site protective strategy; b) implementation of other plan requirements, and/or; c) implementation of regulatory requirements. For example, if ROWS is being implemented, compensatory measures for its loss should consider measures that were effectively implemented within previous site protective strategies. If the compensatory measures for the loss of ROWS do not equate to the same level of effectiveness as measures implemented within previous site protective strategies, a detailed review and analysis should be conducted to fully characterize the nature of the compensatory measures and the differences between the compensatory measures and the previous protective strategy.
- Compensatory measures implementing procedures for partial or catastrophic system failures.
 - Communication capabilities provided to the ROWS operators that enable continuous communications with the alarm stations during the performance of duty.
 - Environmental impact on the ROWS components operation, function, and/or potential to degrade ROWS performance as a result of the site's geographical location.
 - ROWS components and back-up power sources.
5. Evaluation of training impacts for new equipment. An evaluation should be performed to ensure that the appropriate training and qualification criteria for new equipment are addressed in the training and qualification plan prior to the installation and/or implementation of new equipment. Each licensee should take into account the duties and responsibilities that are assigned to each position and the specific knowledge, skills, and abilities required to effectively use the new equipment in the performance of the assigned duties and responsibilities.
- ROWS operators are provided training and qualification on all elements (weapons & tactical) identified in the 10 CFR Part 73, Appendix B VI.

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- Firearms instructors are trained, qualified, and certified by a national or state recognized entity on the use of the firearm.
 - ROWS instructors are trained and qualified to operate ROWS and if applicable , certified, to instruct others to operate ROWS in accordance with the manufacturer specifications on the use of ROWS.
 - The use of ROWS and the actions required of ROWS operators are incorporated into Quarterly Shift Drills and Annual Force on Force exercises.
 - Personnel who perform maintenance, testing, calibration, and repairs to ROWS and ROWS firearms are qualified to perform these functions in accordance with the ROWS and firearms manufacturer's specification and site procedures.
 - Armorer(s) are trained and qualified in accordance with Appendix B to 10 CFR Part 73 and possess a current certification for the specific firearm utilized with the ROWS.
 - Law enforcement agency support and capabilities.
6. For reduction of armed responders/armed security officers, the evaluation approach is much the same for those above. A breakout of the differences in numbers from previous commitments needs to show the change. A summary of how this aspect was evaluated needs to be included in sufficient detail to allow a reviewer to understand the details of the evaluation, and how the conclusion for the determination was reached. Examples would include: a) spelling out the number of tabletop drills, limited scope drills, and exercises that were conducted using the reduced number of personnel, and; b) describing the difference between internal responders vs. external responders used in the previous protective strategy, to include definitive reasons for why the change is not a reduction of effectiveness.

7. For ROWS implementation the following should be analyzed and explained as part of the security plan change submittal:

- Describe the duties and responsibilities of ROWS operators. Do ROWS operators continuously staff ROWS consoles or are they assigned other duties located away from the ROWS console? Describe under what conditions ROWS operators would be re-deployed.
- State the ROWS to operator ratio (is this ratio greater than 1 ROWS per operator?)
- Review and describe State Laws, local ordinance, and company policies and practices that govern the licensee response to incidents such as use of deadly force. Appendix C to Part 73, Section II, paragraph B.3.e. requires that this topic be described in the SCP.



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3 SECURITY PLAN CHANGE EVALUATION CRITERIA FOR ROWS

This guidance provides information pertinent to licensees in determining actions and implementation details that should be considered by licensees when considering ROWS technology for use and implementation at their site.

Attachment 1 to this document provides detailed information that is pertinent to security plan changes resulting from the installation and implementation of ROWS. This information includes examples of items that should be considered and addressed within the security plans and/or the summary of changes submitted to the NRC for implementation of ROWS based on the guidelines in “NUREG 0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants,” Chapter 13, “Conduct of Operations,” Section 13.6.1 ‘Physical Security – Combined License and Operating Reactors.’”.

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4 SECURITY PLAN CHANGE TEMPLATE

The following recommended approach is suggested for use by the licensee when submitting security plan changes to the NRC. Licensees should retain all documentation used during the security plan change review and analysis process in accordance with the retention requirements of 10 CFR 50.90 or 50.54(p)(2).

- A. General description of the change
- B. Description of the evaluation process
 - a. Refer to Section II “Security Plan Change Evaluation Criteria”
- C. Determination of continued ability to: meet regulatory requirements, meet security plan requirements, perform implementing procedures, and perform programmatic functions.
 - a. Demonstrate reduction or non-reduction of effectiveness
 - b. Explanation of how the change continues to provide high assurance of effective implementation of the site physical protection program.
- D. Conclusion
 - a. Should include licensee’s reasoning on whether to submit a 50.90 or 50.54(p) based on information provided in Sections B and C above

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ATTACHMENT 1: AREAS OF CONSIDERATION FOR ROWS IMPLEMENTATION

Licensees who submit security plan changes for implementation of ROWS, should describe in the security plan how the change implements regulatory requirements and should provide a sufficiently detailed description of the changes within the summary of changes to ensure understanding of how ROWS is used and maintained within the security program, to include how the identified changes do not decrease the safeguards effectiveness of the security plans.

Below are examples of items that should be considered and addressed within the affected security plans and or summary of changes for ROWS implementation based on the guidelines in NUREG 0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Chapter 13, "Conduct of Operations," Section 13.6.1 "Physical Security – Combined License and Operating Reactors."

1. Provide a description within the affected security plan(s) which identifies the number of ROWS, the number of ROWS operators, as well as the categorization of ROWS and ROWS operators within the site physical protection program and protective strategy to include: training and qualification, testing and maintenance, duties and responsibilities, and certification, as appropriate.
 - Describe the number of ROWS employed at the site and the number of ROWS operators required to operate these systems (e.g. system to operator ratio).
 - Describe whether the ROWS that are deployed at the site are categorized as personnel, equipment or systems necessary to prevent significant core damage and spent fuel sabotage that require protection from the design basis threat of radiological sabotage vehicle bomb assault.
 - Describe whether ROWS operators are within the minimum numbers of those designated as armed responders or armed security officers that are components of the protective strategy as identified in the physical security plan (PSP)/safeguards contingency plan (SCP).
 - Describe how the protection of ROWS and ROWS operators has been accounted for within the blast analysis that determined the location of the vehicle barrier system. This description should also address the blast analysis considerations for the protection of ROWS in a deployed state.
 - Describe the primary duties and responsibilities of the ROWS operators. Describe any additional duties and responsibilities of the ROWS operators. Describe whether the duties and responsibilities of the ROWS operators require them to leave the immediate vicinity of the ROWS console.

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- Describe the duties and responsibilities of ROWS operators during situations of heightened threat consistent with the graduated protective measures and actions of the site threat warning system.
 - Describe the communication capabilities provided to the ROWS operators that enable continuous communications with the alarm stations during the performance of duty.
2. Provide a description within the PSP that identifies the access control measures used to control access to ROWS consistent with the implementation of the physical protection program.
- Describe the access control measures are used to control access to the various ROWS operator controls.
 - Describe the measures that are implemented to ensure control of access control devices (e.g., keys, locks, combinations, passwords, etc.) associated with the various ROWS operator controls.
3. Provide a description within the PSP of any OCA surveillance, observation, and monitoring duties and responsibilities of ROWS operators using ROWS video technology.
- Describe whether the ROWS operators using ROWS video technology will be used for surveillance, observation, and monitoring of the OCA for the detection and deterrence of intruders and to ensure the integrity of physical barriers or other components and functions of the onsite physical protection program.
 - Describe whether the ROWS video technology is capable of viewing all areas of the OCA that have been identified for surveillance, observation, and monitoring consistent with the implementation of the physical protection program and protective strategy.
 - Describe how the integrity of physical barriers, or other components and functions of the onsite physical protection program are included within the OCA surveillance, observation, and monitoring responsibilities of ROWS operators using ROWS video technology. Describe any other surveillance, observation, and monitoring methodologies that support ROWS operators using ROWS video technology for the portions of the physical barriers, other components, and functions that are not within the field of vision of the ROWS video technology.
 - Describe how ROWS is equipped with alternative technology that enables the system operator to identify intruders and acquire adversarial targets during the implementation of the protective strategy under the loss of facility illumination or low light conditions. This description should also address the ROWS video technology capabilities for performing OCA surveillance, observation and monitoring during the loss of facility illumination or low light conditions.

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4. Provide a description within the PSP of how the ROWS and ROWS firearms are included in the site's maintenance, testing, and calibration program.

- Describe how security maintenance, testing, and calibration implementing procedures specify the operational and technical details required to perform maintenance, testing, and calibration activities on the ROWS. Explain the testing intervals for the ROWS system functions (controls and operational mechanisms) to ensure the systems are maintained in an operable condition, and are capable of performing their intended functions.
- Describe how the personnel that perform maintenance, testing, calibration and repairs to the site's ROWS are qualified to perform these functions in accordance with manufacturers' specifications and site procedures.
- Describe how the site's ROWS are tested in accordance with the site maintenance, testing and calibration procedures before being placed back in service after each repair or inoperable state.
- Describe how the firearms that are mounted in the ROWS are included within the site's firearm maintenance procedures.
- Describe how the integrated accuracy of the ROWS and ROWS mounted firearms deployed at the site are validated upon firearm removal and replacement for maintenance or after exposure to extreme environmental conditions such as earthquakes or high velocity wind.
- Describe the ROWS mounted firearms semi-annual test firing for accuracy and functionality.
- Describe how the test firing of ROWS mounted firearms includes firing the ROWS weapons while mounted in a ROWS platform to ensure integrated accuracy and functionality.
- Describe how ROWS mounted firearms are subject to the same cleaning schedules and requirements as the other duty firearms used to implement the site's physical protection program and protective strategy.
- Describe how the firearms maintenance activities for ROWS mounted firearms are documented in accordance with site procedures.
- Describe how the armorer(s) who conduct armorer level disassembly, assembly, adjustments, modifications, and repairs to ROWS mounted firearms are trained and qualified and possess a current armorer certification for the specific ROWS firearm employed at the site.

5. Provide a description within the PSP that details the implementation of compensatory measures associated with ROWS.

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- Provide a description of compensatory measures that may be performed by ROWS operators using ROWS video technology for direct observation. This description should include confirmation that only compensatory measures that can be abandoned upon the initiation of the protective strategy would be assigned to ROWS operators using ROWS technology to prevent creating a vulnerability.
 - Describe the compensatory measure implemented when a ROWS becomes degraded or is inoperable. This description should include the timeframe for the implementation of the compensatory measure.
 - If the compensatory measure for ROWS is the addition of an armed responder, provide a description of the location of the armed responder's duty post relative to the vicinity of the ROWS area of responsibility that enables a similar response timeline. This description should include any protected positions provided to the armed responder within the ROWS area of responsibility.
 - If the compensatory measure for ROWS is the addition of an armed responder, describe whether this armed responder will be a re-deployable within the protective strategy. If so, describe the resource(s) that replaces the field of fire abandoned by this armed responder upon re-deployment.
 - If the compensatory measure for ROWS is the addition of an armed responder, provide a description of this armed responders responsibilities and capabilities to perform OCA surveillance, observation, and monitoring.
 - If the compensatory measure for ROWS is the addition of an armed responder, provide a description of this armed responder's responsibility to perform other compensatory measures normally assigned to ROWS operators using ROWS video technology. This description should include confirmation that only compensatory measures that can be abandoned upon the initiation of the protective strategy would be assigned to the armed responder acting as a compensatory measure for a degraded or inoperable ROWS to prevent creating vulnerability.
6. Provide a description within the training and qualification plan (T&QP) of the firearms specifications for the firearms mounted in the ROWS.
- Describe the firearm specifications of the firearms mounted in the ROWS (i.e., caliber, muzzle velocity, muzzle energy, magazine or belt fed with a load of (how many) rounds, operable in any environment in which it will be used.
 - Describe the duty amount of ammunition contained in the ROWS magazine or belt that is loaded in each ROWS mounted firearm. This description should also identify whether this amount of ammunition is maintained at all times.

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- Describe the amount of ammunition available onsite for each firearm mounted in ROWS (i.e., two times the capacity of the amount within each ROWS firearm magazine or ammunition belt).
7. Provide a description within the PSP that addresses the safety measures implemented at the site with regard to ROWS and confirm that the implementation of ROWS at the site was evaluated in accordance with the site's safety/security interface processes.
- Describe how the locations of the ROWS provide effective implementation of the ROWS systems and do not have a negative impact on plant equipment and operations.
 - Describe the type of safety measures implemented and/or inherent safety features of the ROWS that minimize the potential for the ROWS to inadvertently transition to the firing mode or have an unintentional discharge.
 - Describe each of the ROWS assigned fields of fire including any lateral and elevation limitations that ensure safety components at the site are not adversely affected during the initiation of the protective strategy and firing of ROWS mounted firearms.
 - Describe the implementation of other safety measures such as those prescribed by the manufacturer, vendor or other industry representatives (e.g., Interagency ROWS Working Group (IROWS) safety standards, DOE-STD-1047-2008 Safety Function and Other Features of Remotely Operated Weapons Systems, PRF IROWS-001, Performance Specification for IROWS, 2009).
8. Provide a description within the T&QP that confirms that ROWS operators are provided training and are qualified within the elements identified in the site's security training and qualification plan. This description should also address the instructor certifications of the firearms instructors that train and qualify ROWS operators.
- Describe how ROWS operators are included within the site's designation of armed members of the security organization that must be trained and qualified on the weapons they employ at the site.
 - Describe how ROWS operators are included in the site's designation of armed individuals that are administered an annual written exam that includes the elements identified within Commission approved security plans and demonstrates the required knowledge, skills and abilities to carry out assigned duties and responsibilities as an armed member of the security organization.
 - Describe how the ROWS operators participate in annual firearms familiarization training prescribed by the regulation and the security training and qualification plan.
 - Describe how the ROWS operators are instructed on the use of deadly force as authorized by applicable state law.

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- Describe the site's daylight and night fire firearm qualification courses that are administered to ROWS operators using the ROWS.
 - Describe how the site's firearms qualification courses for ROWS are consistent with the scoring criteria of the regulation and are in accordance with the ROWS qualification course standards of a law enforcement agency or a nationally recognized entity.
 - Describe how ROWS operators are required to participate in ROWS firearms re-qualifications annually.
 - Describe whether the tactical qualification course is an annual training and qualification requirement for ROWS operators at the site.
 - Describe whether the tactical qualification course administered to ROWS operators includes a stage of fire in which the ROWS is used to engage adversarial targets.
 - Describe how the tactical qualification course for ROWS operators includes operator re-deployment from the ROWS console for ROWS operators ~~that~~ are assigned secondary duties within the protective strategy as re-deployable armed responders.
 - Describe how ROWS is used in the tactical qualification course to simulate the actual conditions under which ROWS operators are required to carry-out their assigned duties during a contingency event.
 - Describe how the firearms instructors ~~that~~ train and qualify ROWS operators are certified by a national or state recognized entity on the use of ROWS. This description should also include the identification of the certifying entity.
 - Describe how certified ROWS firearms instructors are recertified in accordance with the standards of the certifying entity. This description should include the recertification periodicity implemented for the recertification of ROWS firearms instructors.
 - Provide a description that explains how ROWS and ROWS operators will be incorporated into quarterly tactical response drills and annual force-on-force exercises.
9. Provide a description within the safeguards contingency plan (SCP) of the integration of ROWS and ROWS operators within the protective strategy.
- Describe whether ROWS operators are within the minimum numbers of those designated as armed responders or armed security officers ~~that~~ are components of the protective strategy as identified in the physical security plan (PSP)/safeguards contingency plan (SCP).
 - Describe the ROWS system to operator ratio (e.g. 2 ROWS per operator, etc.).



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- Describe the location of ROWS operators during normal operations and whether the ROWS operators continuously staff the ROWS consoles or are assigned other duties located away from the ROWS console.
- If ROWS operators perform duties away from the ROWS console explain how the displacement between the operator and the ROWS console was accounted for within ROWS operator timelines.
- If ROWS operators perform duties away from the ROWS console describe the resource that assumes the OCA surveillance, observation, and monitoring responsibilities assigned to the ROWS operator using ROWS video technology.
- Describe whether the site's implementation of ROWS includes the re-deployment of ROWS operators armed with contingency weapons to facilitate response in areas that are beyond the capability of the statically mounted ROWS. This description should also describe the criterion for re-deployment (e.g., directed by security response team leader, security supervisor, etc. or pre-planned at the discretion of the armed responder based on adversary location, etc.) This description should also describe the resources that replace the fields of fire provided by the ROWS upon ROWS operator re-deployment.
- Describe whether the ROWS mounted firearms remain loaded at all times, and if not, whether the protective strategy timelines account for loading ROWS mounted firearms.
- Describe the measures that are implemented within the protective strategy for a ROWS mounted firearm that requires a re-load during a contingency event.
- Describe the measures that are implemented within the protective strategy to account for ROWS mounted firearm malfunctions during a contingency event.
- Describe whether the ROWS is capable of remaining operable during the loss of normal power and how the ROWS retains this capability (e.g., UPS, battery backup, diesel generator, etc.).
- Describe the type of protection provided to the ROWS motive and power control cables and the ROWS operating mechanisms to include video technology when in the deployed state that ensures that the system is not susceptible to operational interruption resultant from adversary counter fire.
- Describe the new fields of fire that include the integration of ROWS and the new interdiction capability resultant from ROWS implementation.
- Describe the reconfiguration of the armed response organization and the implementation of ROWS. Provide a detailed description and any supporting diagrams of the new protective strategy which includes the ROWS and ROWS operators and the removal of any armed responders.
 - This description should include but is not limited to the following:

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- the number of ROWS added;
- the location of all ROWS;
- the number of ROWS operators;
- the location of ROWS operators;
- the identification of ROWS assigned to the specific ROWS operators;
- the location of armed responders and armed security officers ~~that~~ are not ROWS operators;
- the previous protective strategy armed response locations that have been replaced by ROWS;
- primary and secondary contingency response responsibilities for armed responders, armed security officers and ROWS operators including any ROWS operator re-deployment;
- overview of the fields of fire provided by the new protective strategy;
- calculations of the total time of adversary exposure to external fields of fire on each side of the plant starting at the protected area perimeter boundary (include breaching timelines/barrier delays, rate of travel (feet per second) accounting for the distance from isolation zones to the first available building or structure providing cover).
- The description should address the implementation of the protective strategy starting from the outermost facility perimeter moving inward to target sets.

10. Provide a description within the SCP that addresses the methodology used to determine the existence and level of a threat and the initiation of the protective strategy. This description should include the identification of the line of demarcation from which the protective strategy timelines are derived (e.g. protected area perimeter isolation zone, protected area perimeter intrusion detection equipment, etc.).

- Describe the location (e.g. protected area perimeter isolation zone, protected area perimeter intrusion detection equipment, etc.), that was used to derive the protective strategy timelines including whether the ROWS are the contingency response assets within the closest proximity to this location. This description should address how the ROWS, being the most forward deployed response asset, satisfies the criterion for the use of deadly force (e.g. ability, opportunity, and jeopardy) in accordance with applicable state law without having a person directly exposed to the threat of imminent danger. This description should confirm that the methodology used to determine the existence and level of threat (to include satisfying the criterion for the use of deadly force) was considered in the establishment of protective strategy response timelines.

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Describe how/what has been communicated or shared with LLEA and how the implementation of ROWS impacts LLEA response.