

FOIA Resource

From: David Lochbaum <dlochbaum@ucsusa.org>
Sent: Monday, December 01, 2014 3:26 PM
To: FOIA Resource
Subject: WWW Form Submission

FOIA REQUEST
Case No.: 2015-0073
Date Rec'd: 12/2/14
Specialist: Stevens
Related Cases:

Below is the result of your feedback form. It was submitted by

David Lochbaum (dlochbaum@ucsusa.org) on Monday, December 01, 2014 at 15:25:53

through the IP(b) (6)

using the form at <http://www.nrc.gov/reading-rm/foia/foia-submittal-form.html>

and resulted in this email to foia.resource@nrc.gov

Company/Affiliation: Union of Concerned Scientists

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Country-Other:

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Desc: The enclosures to SECY-14-0088 dated August 20, 2014.

FeeCategory: Educational

MediaType:

MediaType_Other_Description:

Expedite_ImminentThreatText:

Expedite_UrgencyToInformText:

Waiver_Purpose: UCS intends to review the records provided in response to this FOIA to better understand the force-on-force inspection program and proposed changes to it.

Waiver_ExtentToExtractAnalyze: UCS believes that the NRC's force-on-force inspection program is an important component in providing adequate protection against radiological sabotage. We will review the requested records to better understand the problems with the current inspection program and to evaluate whether the proposed changes resolve those problems without either reducing the effectiveness of the inspections or create unintended consequences.

Waiver_SpecificActivityQuals: UCS has two staff members (Lochbaum and Lyman) with considerable engagement with the NRC on physical protection regulations and associated inspection regimes. Both participated in public meetings on security dating back to before the tragic events of 9/11. UCS will rely on this experience to evaluate the potential net effect of the proposed changes to the force-on-force inspection program.

Waiver_ImpactPublicUnderstanding: As evidenced by UCS's Dr. Ed Lyman being invited by the NRC to be on the panel at the 2014 Regulatory Information Conference discussing the force-on-force testing and inspection program, UCS is a recognized voice on security issues. The reports, testimony, and blogs UCS prepares on security reach large audiences and our perspectives are often solicited by reporters for their audiences. The NRC's force-on-force inspection program is among the more prominent aspects of nuclear plant security, so our commentary on the proposed changes will likely find a considerable audience and aid that audience with its understanding.

Waiver_NatureOfPublic: As touched upon in the response to Question 4 above, force-on-force testing has been a prominent element of the NRC's nuclear plant security measures. It is a key method of ensuring that the various aspects of physical protection fit together seamlessly and are effective. From the NRC's annual report to Congress on security to the cover letters transmitting individual plant force-on-force inspection results, the public living around nuclear plants maintains an interest in this subject and UCS's commentaries often reach this public.

Waiver_MeansOfDissemination: UCS issues reports, fact sheets, testimonies, and blogs on nuclear plant safety and security issues. We will likely use one or more of these vehicles, in addition to responding to media inquiries, to communicate our perspectives to the general public.

Waiver_FreeToPublicOrFee: Materials posted to our website, www.ucsusa.org, and our blog, allthingsnuclear.org, are available for viewing/downloading free of charge.

Waiver_PrivateCommericalInterest: None.
