

Update on Staff's Follow up Actions on SRM-17-0100

Public Meeting
Commissioners' Hearing Room
December 17, 2018

Agenda

- Overview of Staff's Draft Options
- Industry Presentation on Security Bounding Time (SBT) White Paper
- Discussion of Options for Crediting LLEA
- Questions on Industry's SBT White Paper
- Discussion on Applying Credit through Changes to Target Sets
- Discussion on Applying Credit through Changes to the Significance Determination Process (SDP)
- Discussion on Applying Credit through Changes to Regulatory Guide 5.81, Criterion 3
- Conclusion

Draft Options

- Sliding Scale
- Industry's Security Bounding Time (SBT)
White Paper
- Consideration of 10 CFR 50.47

Sliding Scale Option

- Site-specific credit based on:
 - Level of coordination, planning, and training between licensees and law enforcement (LE) responders
 - Area of the site in which law enforcement assistance would be needed (i.e., owner controlled area, exterior portions of a protected area, inside site structures)
- Uses standardized criteria to evaluate coordination, planning, and training
- Cover six types of incident response preparation
- **Guiding principle:** more criteria met = better LE preparedness = greater licensee credit
- Example of potential credit: Add operator actions & equipment (e.g., FLEX) to target sets

Documentation

- Commitments
- Plans
- Training
- Corrective actions
- Lessons learned

Information Exchange

- Site information provided in advance
- Contingency Response Tools
- Tactical Mission Planning Package
- Periodic review and update of plans

Familiarization Activities

- Information on site security, adversary, & law enforcement capabilities
- Periodic walk-downs of areas related to law enforcement support
- Environmental hazards
- Lessons inform planning, training and documentation

Tabletop Discussions

- Periodicity
- Involve site and law enforcement management
- Lessons inform planning, training and documentation

Communications

- Primary, secondary, and tertiary systems and protocols
- Individual- or command center-based
- Periodic onsite testing, including of law enforcement equipment
- Frequency map documented and included in plans
- Lessons inform planning, training and documentation

Training and Validation

- Periodic functional exercises (permissive environment)
- Periodic field exercises (simulated combat environment)
- Lessons inform planning, training and documentation

Security Coping Time (decreasing)



Law Enforcement Preparedness (increasing)



Industry's SBT Proposal

- Site-specific credit based on a 6-step process and security coping time formulas
- Security coping time formulas by support area: Owner Controlled Area and Protected Area
- Example of potential credit: Add operator actions & equipment (e.g., FLEX) to target sets

Consideration of 10 CFR 50.47

- Option for Commission to equate offsite response actions off licensee property under 10 CFR 50.47(c)(1)(iii)(B) with offsite response actions on licensee property, including potentially inside protected areas
- Would likely establish the same security coping time for every power reactor site
- May consider establishing security coping times in tiers, likely based on licensees' geographic proximity to LE assistance
- Would need to evaluate if this requires change to other requirements to implement

Questions on Sliding Scale

Questions on Industry's SBT White Paper

Discussion on Applying Credit through Changes to Target Sets

***Discussion on Applying Credit
through Changes to the
Significance Determination
Process (SDP)***

***Discussion on Applying Credit
through Changes to Regulatory
Guide 5.81, Criterion 3***

Conclusion