

Comments on Draft Regulatory Basis - Physical Security for Advanced Reactors Rulemaking

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August 8, 2019



General/Overall Comment

- NEI and our members support the rulemaking
- The performance-based approach is technically sound and will lead to security requirements sufficient to protect public health and safety
- Codification will achieve NRC staff goals (e.g., reduce need for exemptions and improve regulatory stability & predictability)

Comments

- Support staff's willingness to identify additional requirements that may be eliminated or modified to reduce the number of exemptions
 - New requirements should allow security personnel to have additional duties and/or be located outside the Protected Area provided the NRC-approved security plan can be effectively implemented

Comments

- Requirements and guidance for reliance upon offsite resources to support recovery and mitigation strategies will need to be clearly articulated
 - Programmatic documents
 - Letters of Agreement/MOUs and contracts
 - Design change and configuration management controls
 - Implementing procedures
 - Training and drill program