

SECURITY

PROGRAM APPLICABILITY: IMC 2202 Appendix A

81200-01 INSPECTION OBJECTIVE

The objective of this inspection procedure (IP) is to gather information to determine whether a licensee is meeting the overall decommissioning security objective, which is to provide assurance that the licensee's security programs can protect against the design basis threat (DBT) of radiological sabotage, and the loss, theft or diversion of special nuclear material from internal and external threats.

In meeting this objective, this procedure has provisions for verification and assessment of licensee action with respect to Commission initiatives deemed necessary to address adequacy in the protection of public health and safety and maintaining common defense and security from the DBT or changes therein. The Commission initiatives include Orders, regulatory issue summaries, rulemaking or other action.

81200-02 INSPECTION REQUIREMENTS AND INSPECTION GUIDANCE.

02.01 Pursuant to Inspection Manual Chapter (IMC) 2202, "Security Inspection Program for Decommissioning Nuclear Power Reactors," decommissioning security inspection requirements are identified in and satisfied by the following inspectable area inspection procedures listed below:

- a. Access Authorization (IP 81200.01)
- b. Access Control (IP 81200.02)
- c. IP 81200.03, reserved
- d. Equipment Performance, Testing, and Maintenance (IP 81200.04)
- e. Protective Strategy Evaluation and Performance Evaluation Program (IP 81200.05)
- f. Protection of Safeguards Information (IP 81200.06)
- g. Security Training (IP 81200.07)
- h. IP 81200.08, reserved
- i. IP 81200.09, reserved
- j. IP 81200.10, reserved
- k. IP 81200.11, reserved
- l. Review of Decommissioning Reactor Target Sets (IP 81200.14)

The U.S. Nuclear Regulatory Commission (NRC) developed guidance to give inspectors an acceptable approach to verifying inspection requirements. The inspectors should not view recommended actions contained in the guidance section as mandatory, but rather as an acceptable method for evaluating licensee programs to ensure licensees are meeting NRC regulatory requirements within the security program area undergoing inspection. Should questions arise about procedural requirements or guidance, inspector(s) should consult with regional management or the appropriate Office of Nuclear Security and Incident Response representative for clarification.

02.02 These requirements represent the level of inspection activity to be conducted at each decommissioning nuclear power reactor site at the frequency shown in each inspectable area IP.

- a. The inspection requirements in Section 02 of the listed inspection procedures describe the necessary actions to be completed in order to achieve the inspection objective(s) stated in Section 01 of the procedures. Inspection requirements may include, but are not limited to, systems, components, records, procedures, programs, and operations.
- b. The resource estimate is stated in Section 04 of the listed inspection procedures to complete the inspection requirements in Section 02 of the procedures. The inspection requirements are to be completed to a level which provides assurance that licensees are meeting NRC regulatory requirements within the security program area being inspected. Therefore, all inspection requirements need not be completed for every particular inspection. However, the inspector(s) should perform a minimum of 50 percent of the applicable requirements and the objectives of the inspection procedure shall be met to demonstrate completion of the respective IP.

02.03 Problem Identification and Resolution. The primary means by which licensees maintain an appropriate level of safety and security is through effective use of its corrective action program to correct deficiencies involving human performance, equipment, programs, and procedures. Therefore, the security core inspection program includes samples of licensees' corrective action program activities to gauge their effectiveness of the program.

81200-03 INSPECTION RESOURCES.

Each inspectable area inspection procedure contains estimates of needed inspection resources.

END

Attachment 1: Revision History for IP 81200

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession No. (Pre-Decisional Non-Public Information)
	ML13234A301 08/27/14 CN 14-019	This Inspection procedure is an initial issuance that was developed to support decommissioning inspections for IMC 2202. Researched commitments for the last four years and found none.	N/A	ML14164A097
	ML20035D911 07/28/20 CN 20-035	This IP is being changed from OUO-SRI to publicly available as it contains no OUO-SRI after SUNSI/CUI review	N/A	ML20035909