

NUCLEAR REGULATORY COMMISSION
REGULATORY GUIDE

Notice of Issuance and Availability

The Nuclear Regulatory Commission has published proposed revisions to Chapters 4 and 18 of Regulatory Guide 5.52, Revision 1, "Standard Format and Content for the Physical Protection Section of a License Application (for Facilities Other Than Nuclear Power Plants)." These chapters have been revised to provide guidance to licensees for preparing the training and qualification plans they will be required to provide under amendments to paragraphs 73.30(d), 73.30(e), 73.50(a)(4), and 73.50(h) of 10 CFR Part 73 and the new Appendix B to Part 73 entitled "General Criteria for Security Personnel." These amendments are being published at the same time as this proposed guidance but will not become effective for 60 days, at which time this and other guidance will be republished in final form after consideration of public comment. When Regulatory Guide 5.52 is revised in its entirety, these revised chapters will be incorporated.

Comments and suggestions on these chapters should be sent to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch. In order for comments to be taken into consideration, they should be received no later than September 8, 1978.

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In addition to these revised chapters, two training manuals have been issued for comment. These manuals will provide guidance to licensees in developing their training and qualification plans. These are:

NUREG-0464, "Site Security Personnel Training Manual,"

NUREG-0465, "Transportation Security Personnel Training Manual."

Single copies of these documents may be obtained by writing to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Bernadine Scharf, Distribution Service Branch.

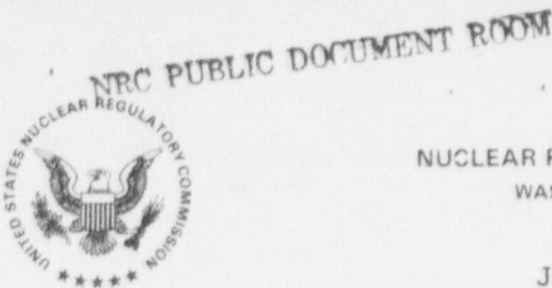
(5 U.S.C. 552(a))

Dated at Rockville, Maryland this 1st day of August 1978.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert B. Minogue

Robert B. Minogue, Director
Office of Standards Development



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 31, 1978

REGULATORY GUIDE DISTRIBUTION LIST (DIVISION 5)

Transmitted herewith for review and comment are proposed revisions to Chapters 4 and 18 of Regulatory Guide 5.52, "Standard Format and Content for the Physical Protection Section of a License Application (for Facilities Other Than Nuclear Power Plants)." These chapters have been revised to provide guidance to licensees for preparing the training and qualification plans they will be required to provide under amendments to paragraphs 73.30(d), 73.30(e), 73.50(a)(4), and 73.50(h) of 10 CFR Part 73 and the new Appendix B to Part 73 entitled "General Criteria for Security Personnel." These amendments are being published at the same time as this proposed guidance but will not become effective for 60 days, at which time this and other guidance will be republished in final form after consideration of public comment. When Regulatory Guide 5.52 is revised in its entirety, these revised chapters will be incorporated.

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Robert B. Minogue

Robert B. Minogue, Director
Office of Standards Development

Revisions to
Chapter 4, "Security Organization"
Chapter 18, "Security Personnel"
of
Regulatory Guide 5.52

Revision 1

STANDARD FORMAT AND CONTENT FOR THE PHYSICAL PROTECTION
SECTION OF A LICENSE APPLICATION (FOR FACILITIES OTHER
THAN NUCLEAR POWER PLANTS)

Office of Standards Development
U.S. NUCLEAR REGULATORY COMMISSION

CHAPTER 4 SECURITY ORGANIZATION

The information in this chapter should describe the security organization, its responsibilities, and its relationship to the overall management structure of the applicant. Security responsibilities and the chain of command for decision-making on security matters should be included. The information also should include a description of the provisions to be used to ensure that the quality of security personnel is adequate.

4.1 Management Organization

Describe the management structure for operation of the plant. An organization chart should be provided, together with job descriptions identifying the functions, responsibilities, and authority for each of the positions that involves physical protection. Indicate the organizational position responsible for the shift supervision of the security force.

4.2 Security Organization

Provide a chart of the security organization and generic job descriptions of the security personnel. These job descriptions for those personnel covered by Appendix B to Part 73 should provide sufficient information to permit determination of the skills, knowledge, and abilities necessary to conduct the job. Describe the security organization for each shift. Indicate whether the security force is a part of the facility organization

or is acquired by contract. If a contract force is used, state the specific functions provided by the contractor. Describe how the applicant will ensure that the contract functions are performed adequately.

4.3 Security Personnel

The information in this section should describe the processes to be used for the selection, training, testing, qualifying, and equipping of security personnel appropriate to the criteria in Appendix B to Part 73. Guidance is provided in Regulatory Guide 5.20, "Training, Equipping, and Qualifying of Guards and Watchmen," and NUREG-0464, "Site Security Personnel Training Manual."

4.3.1 Employment Suitability and Qualification

4.3.1.1 Suitability. This section should describe how applicants will be screened for security jobs identified by the criteria of Appendix B to Part 73. The plan should indicate:

1. how an applicant's educational background will be verified; in the absence of a high school diploma, the plan should indicate the type of examination to be used and how it will be administered and graded to ensure standard practice;
2. how applicants will be screened to ensure that they have no felony convictions involving the use of weapons or reflecting adversely on the suitability of the applicant for the prospective job duties; and
3. the criteria that will be used to ensure the maturity and reliability of persons assigned to serve in an armed capacity if they are not 21 years of age.

Provide a copy of a typical employment application. State whether fingerprints are taken. Describe the policies and procedures established to verify an applicant's employment, military, fingerprint, arrest, and conviction records and to ascertain his character. Indicate whether information is gathered by letter, by telephone, or in person and whether a written report of results is prepared.

Identify the organizational unit and position titles of persons who evaluate applications and have approval authority (e.g., for hiring). State the approval and rejection criteria.

4.3.1.2 Physical Qualifications. This section should describe how applicants will be screened against the physical qualifications criteria of Appendix B to Part 73. The plan should affirm that the physical examinations would be given by a licensed physician. The plan should identify the security jobs requiring full physical qualifications and those security jobs requiring less than the full physical qualifications and identify the bases for any exceptions.

4.3.1.3 Mental Qualifications. This section should describe how applicants will be screened against the mental qualifications criteria of Appendix B to Part 73. The plan should describe the criteria an examiner will use or the written or oral tests that will be used to determine mental alertness, good judgment, ability to carry out instructions, and communications abilities. The plan should describe the evaluation method to be used for armed personnel and central alarm station

operators to determine that such applicants have no emotional instability that would interfere with their assigned security job duties. The evaluation method should identify the security jobs, the type of emotional instability that could interfere with the jobs, and the tests or criteria employed to ensure the absence of such emotional instability. The professional title, qualifications, and experience of the person who will make the determination should be stated. The plan also should describe the continued observation program for indications of emotional instability and indicate how responsible supervisors will be trained for such observation and the indicators that the supervisors will be trained to look for.

4.3.1.4 Physical Fitness Qualifications. This section should describe the program by which security personnel are qualified as physically fit to perform assigned duties. The plan should identify for the respective security jobs identified in Appendix B to Part 73 the levels of strenuous activity, physical exertion, stress, and exposure to the elements associated with each job for both normal and contingency operations. The plan should describe the tests and criteria to be used in determining that persons assigned jobs are appropriately physically fit, e.g., for running or climbing and response to stress or heat or cold, and the program that will be used to ensure that such persons remain physically fit.

4.3.1.5 Regualification. This section should describe how security personnel identified in Appendix B to Part 73 are requalified appropriate to the criteria in Appendix B. The plan should include schedules for and description of tests and examinations for requalification.

4.3.1.6 Documentation. The documentation to be maintained for the results of suitability, mental, and physical tests and examinations should be described in a separate section or in the sections describing the processes for collection of the information to be documented.

4.3.1.7 Contract Security Personnel. This section should describe the procedures used to ensure that contract security personnel conform to the suitability and qualification criteria of Appendix B to Part 73.

4.3.2 General Training and Qualification

4.3.2.1 Qualification. This section should describe the tests and examinations used to ensure that the persons assigned security jobs identified in Appendix B to Part 73 are qualified to carry out assigned duties. The plan should identify:

1. the security jobs to be covered by the plan and the tasks involved in such jobs. Job descriptions should provide this information.
2. the skills, knowledge, and abilities needed to carry out the identified tasks. Appendix B to Part 73 identifies the areas of skill, knowledge, and abilities that are to be considered in developing the plan, and
3. the tests, examinations, and demonstrations to be used to ensure that persons assigned the jobs have the skills, knowledge, and abilities to carry them out. NUREG-0464, "Site Security Personnel Training Manual," includes test material that will provide guidance in this respect. It is neither necessary nor desirable to include the detailed tests in the

plan submitted for approval. A general description is all that is needed with appropriate references to the detailed documents.

4.3.2.2 Training. This section should describe the training program to be used for persons to perform those security jobs identified in Appendix B to Part 73 and described in the qualification section of the plan. The plan should identify blocks of training to be provided for various levels of skill, knowledge, and ability required. For example, there should be a basic block that all security personnel would need, which might include subject matter related to the first ten to thirteen areas listed in Appendix B to Part 73. Other blocks would include groups of topics appropriate to the job functions as defined by site-specific job descriptions. NUREG-0464, "Site Security Personnel Training Manual," provides guidance for the topics to be included, lesson plans for each topic, and tests to determine the adequacy of the training. It is neither necessary nor desirable to include the detailed lesson plans in the training plan submitted for approval. A general description including identification of topics and references to detailed documents is all that is needed.

The plan also should describe the training facilities to be used and the qualifications of the instructors. If the training is to be provided other than by the licensee's own personnel at the licensee's facility, the program to be used should be referenced if it is an NRC approved program or described as indicated above.

4.3.2.3 Requalification and Training. This section should describe the procedures for ensuring that security personnel maintain proficiency with respect to assigned duties. The plan should present schedules for and descriptions of requalification tests, examinations, or demonstrations to be used. The plan should also identify any refresher retraining courses to be used routinely and criteria for requiring retraining based on requalification testing. The plan should also describe the criteria that will be used to determine that a person need not receive training in certain areas because of prior training or experience.

4.3.2.4 Documentation. The documentation to be maintained for training and qualifications should be described either in a separate section or in the sections describing the training and qualification procedures, tests, and examinations.

4.3.2.5 Contract Security Personnel. This section should describe the procedures used to ensure that contract security personnel conform to the training and qualification criteria of Appendix B to Part 73.

4.3.3 Weapons Training and Qualification

4.3.3.1 Qualification. This section should describe the procedures, tests, examinations, and qualification firing to be used to qualify armed security personnel in accordance with Appendix B to Part 73 for that equipment each person is assigned to use. The plan should identify the equipment to be assigned to each security person (see section 4.3.4), the qualification procedures, and the facilities to be used. The plan should also describe criteria to be used to determine if a person is able to qualify without additional training.

4.3.3.2 Training. This section should describe the training to be provided armed personnel to ensure proficiency with their assigned equipment. The plan should describe the training to be provided by outlining the topics to be covered, the tests and criteria for determining the adequacy of the training, the training facility, and personnel. NUREG-0464, "Site Security Personnel Training Manual," provides lesson plans and test criteria guidance in this area. It is neither necessary nor desirable to include the detailed lesson plans in the training plan submitted for approval. A general description including identification of topics and reference to detailed documents is all that is needed.

4.3.3.3 Requalification and Training. This section should describe the procedures used to requalify armed personnel. The plan should include requalification schedules and procedures to comply with the criteria of Appendix B to Part 73. The plan should present criteria to be used to require retraining or additional training and should identify any routine retraining that would be required.

4.3.3.4 Documentation. This section should describe the documentation that will be maintained to provide evidence of weapons training, qualification, and requalification.

4.3.3.5 Contract Armed Security Personnel. This section should describe the procedures to be used to ensure that contract armed security personnel conform to the weapons qualification and training criteria of Appendix B to Part 73.

4.3.4 Equipment

This section should describe the equipment to be provided for armed security personnel under both normal and contingency conditions. The plan should provide a rationale for providing or not providing the equipment identified in Appendix B to Part 73 based on normal or contingency security assignments and on site-specific conditions. For example, a guard assigned to an interior vault guard position, either for normal or for contingency conditions probably would not be equipped with a long-range rifle. The plan also should describe the status of the equipment in terms of custody, storage, maintenance, distribution, and control under both normal and contingency conditions.

Chapter 18 Security Personnel

The information in this chapter should describe the security organization and personnel responsible for protection of SSNM shipments. The information should include a description of the provisions to be used to ensure that the quality of security personnel is adequate.

18.1 Management Structure

This section should describe the management structure within which would fall the responsibility for protection of SSNM shipments. The description should specify the organizational position and show the relationships among the following: (1) the individuals who will be responsible for the planning and execution of the program for the protection of SSNM shipments, (2) the individual who will be in charge of the team that physically accompanies a shipment, (3) the individuals who will monitor transfers, (4) the agents and nonemployees who have a role in the protection of SSNM shipments, (5) the individuals who will be responsible for receiving and recording location information while the shipment is enroute, and (6) the individual who will be responsible for notifying an appropriate law enforcement agency and the NRC in the event of a contingency. The plan should identify those responsibilities to be carried out by facility personnel and those to be carried out by contractor or agent personnel. The plan should describe the procedures to be used to ensure that personnel of contractors or agents are adequately qualified to carry out their assigned responsibilities.

18.2 Security Organization

Provide a chart of the security organization that will be responsible for protection of SSNM shipments, including generic job descriptions of the personnel. These job descriptions for those personnel covered by Appendix B to Part 73 should provide sufficient information to permit determination of the skills, knowledge, and abilities necessary to conduct the job. More than one chart may be necessary to show the organization of the facility personnel, agent personnel, and carrier personnel. Indicate which organization is providing the shipment escort force and any guards needed at transfer or other stopping points. Describe how the applicant or licensees will ensure that all the shipment security functions are performed adequately.

18.3 Security Personnel

The information in this section should describe the processes to be used for the selection, training, testing, qualifying, and equipping of transportation security personnel appropriate to the criteria in Appendix B to Part 73. Guidance is provided in Regulatory Guide 5.20, "Training, Equipping, and Qualifying of Guards and Watchmen," and NUREG-0465, "Transportation Security Personnel Training Manual."

18.3.1 Employment Suitability and Qualification

18.3.1.1 Suitability. This section should describe how applicants will be screened for security jobs identified by the criteria of Appendix B to Part 73. The plan should indicate:

1. how an applicant's educational background will be verified; in the absence of a high school diploma, the plan should indicate the type of examination to be used and how it will be administered and graded to ensure standard practice;

2. how applicants will be screened to ensure that they have no felony convictions involving the use of weapons or reflecting adversely on the suitability of the applicant for the prospective job duties; and

3. the criteria that will be used to ensure the maturity and reliability of persons assigned to serve in an armed capacity if they are not 21 years of age.

Provide a copy of a typical employment application. State whether fingerprints are taken. Describe the policies and procedures established to verify an applicant's employment, military, fingerprint, arrest, and conviction records and to ascertain his character. Indicate whether information is gathered by letter, by telephone, or in person and whether a written report of results is prepared.

Identify the organizational unit and position titles of persons who evaluate applications and have approval authority (e.g., for hiring). State the approval and rejection criteria.

18.3.1.2 Physical Qualifications. This section should describe how applicants will be screened against the physical qualification criteria of Appendix B to Part 73. The plan should affirm that the physical

examinations would be given by a licensed physician. The plan should identify the security jobs requiring full physical qualifications and those security jobs requiring less than the full physical qualifications and identify the bases for any exceptions.

18.3.1.3 Mental Qualifications. This section should describe how applicants will be screened against the mental qualifications criteria of Appendix B to Part 73. The plan should describe the criteria an examiner will use or the written or oral tests that will be used to determine mental alertness, good judgment, ability to carry out instructions, and communications abilities. The plan should describe the evaluation method to be used for armed personnel to determine that such applicants have no emotional instability that would interfere with their assigned security job duties. The evaluation method should identify the security jobs, the type of emotional instability that could interfere with the jobs, and the tests or criteria employed to ensure the absence of such emotional instability. The professional title, qualifications, and experience of the person who will make the determination should be stated. The plan also should describe the continued observation program for indications of emotional instability and indicate how responsible supervisors will be trained for such observations and the indicators that the supervisors will be trained to look for.

18.3.1.4 Physical Fitness Qualifications. This section should describe the program by which security personnel are qualified as physically fit to perform assigned duties. The plan should identify for the

respective security jobs identified in Appendix B to Part 73 the levels of strenuous activity, physical exertion, stress, and exposure to the elements associated with each job for both normal and contingency operations. The plan should describe the tests and criteria to be used in determining that persons assigned jobs are appropriately physically fit, e.g., for running or climbing and response to stress or heat or cold, and the programs that will be used to ensure that such persons remain physically fit.

18.3.1.5 Requalification. This section should describe how security personnel identified in Appendix B to Part 73 are requalified appropriate to the criteria in Appendix B. The plan should include schedules for and descriptions of tests and examinations for requalification.

18.3.1.6 Documentation. The documentation to be maintained for the results of suitability, mental, and physical tests and examinations should be described in a separate section or in the sections describing the processes for collection of the information to be documented.

18.3.1.7 Contract Security Personnel. This section should describe the procedures used to ensure that contract security personnel conform to the suitability and qualification criteria of Appendix B to Part 73.

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18.3.2.1 Qualification. This section should describe the tests and examinations used to ensure that the persons assigned security jobs identified in Appendix B to Part 73 are qualified to carry out assigned duties. The plan should identify:

1. the security jobs to be covered by the plan and the tasks involved in such jobs. Job descriptions should provide this information.

2. the skills, knowledge, and abilities needed to carry out the identified tasks. Appendix B to Part 73 identifies the areas of skill, knowledge, and abilities that are to be considered in developing the plan, and

3. the tests, examinations, and demonstrations to be used to ensure that persons assigned the jobs have the skills, knowledge, and abilities to carry them out. NUREG-0465, "Transportation Security Personnel Training Manual," includes test material that will provide guidance in this respect. It is neither necessary nor desirable to include the detailed tests in the plan submitted for approval. A general description is all that is needed with appropriate reference to the detailed documents.

18.3.2.2 Training. This section should describe the training program to be used for persons requiring training to perform those security jobs identified in Appendix B to Part 73 and described in the qualification section of the plan. The plan should identify blocks of training to be provided for various levels of skill, knowledge, and ability required. For example, there should be a basic block that all security personnel would need, which might include subject matter related to the first ten to thirteen areas listed in Appendix B to Part 73. Other blocks would include groups of topics appropriate to the job functions as defined by transport-specific job descriptions. NUREG-0465, "Transportation Security Personnel Training Manual," provides guidance for the topics to be included, lesson

plans for each topic, and tests to determine the adequacy of the training. It is neither necessary nor desirable to include the detailed lesson plan in the training plan submitted for approval. A general description including identification of topics and references to detailed documents is all that is needed.

The plan also should describe the training facilities to be used and the qualifications of the instructors. If the training is to be provided other than by the licensee's own personnel at the licensee's facility, the program to be used should be referenced if it is an NRC approved program or described as indicated above.

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18.3.3 Weapons Training and Qualification

18.3.3.1 Qualification. This section should describe the procedures, tests, examinations, and qualification firing to be used to qualify armed personnel in accordance with Appendix B to Part 73 for that equipment each person is assigned to use. The plan should identify the equipment to be assigned to each security person (see section 18.3.4), the qualification procedures, and the facilities to be used. The plan should also describe the criteria to be used to determine if a person is able to qualify without additional training.

18.3.3.2 Training. This section should describe the training to be provided armed personnel to ensure proficiency with their assigned equipment. The plan should describe the training to be provided by outlining the topics to be covered, and the tests and criteria for determining the adequacy of the training, the training facility, and personnel. NUREG-0465, "Transportation Security Personnel Training Manual," provides lesson plans and test criteria guidance in this area. It is neither necessary nor desirable to include the detailed lesson plans in the training plan submitted for approval. A general description including identification of topics and reference to detailed documents is all that is needed.

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18.3.3.5 Contract Armed Security Personnel. This section should describe the procedures to be used to ensure that contract armed security personnel conform to the weapons qualification and training criteria of Appendix B to Part 73.

18.3.4 Equipment

This section should describe the equipment to be provided for armed security personnel under both normal and contingency conditions. The plan should provide a rationale for providing or not providing the equipment identified in Appendix B to Part 73 based on normal or contingency security assignments and on transport-specific conditions. The plan also should describe the status of the equipment in terms of custody, storage, maintenance, distribution, and control under both normal and contingency conditions.

COVER SHEET FOR CORRESPONDENCE

Use this Cover Sheet to Protect Originals of Multi-Page Correspondence.

Note:

A Value Impact Statement is not needed for this material. We are requesting comments on Chapters 4 and 18 of RG 5.52 (Rev.1). These chapters have been revised in accordance with an amendment to 10 CFR Part 73. After we receive comments on these two chapters, we will revise the entire guide.

Margaret Sparks

OSD

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