

NEI 03-12, Rev. 8

Pre-submittal Meeting

April 03, 2024



NEI 03-12, Revision 8 Pre-submittal Meeting



■ Overview

- Industry Representation and Point of Contact
- Brief History of Document
- Purpose for Revision
- Revision Attributes
- Supporting Document
- Requested Outcome

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■ NEI 03-12 Team Industry Representation:

- AEP
- Constellation Energy
- Dominion Energy
- Duke Energy
- Entergy
- Excel Services
- Holtec
- Nuscale Power
- PG&E
- PSEG
- Southern Company
- Tennessee Valley Authority (TVA)

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- NEI 03-12 Team Point of Contact and Team Lead
 - Primary Point of Contact:
 - ◆ Mike Whitlock, Nuclear Energy Institute
 - Team Lead:
 - ◆ Pat Asendorf, TVA

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- History of NEI 03-12
 - Template Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, hereinafter “Plan”
 - ◆ Composite Plan is designated as Safeguards Information
 - Nuclear Strategic Issue Advisory Committee (NSIAC) Initiative
 - Initial development and issuance

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- History of NEI 03-12, continued
 - Revision 2 thru 5, minor revisions
 - Revision 6, first major revision
 - Currently two NRC endorsed versions
 - ◆ Revision 7, dated 2011
 - ◆ Revision 7.1, dated 2018

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■ Purpose

- The purpose of this template revision is to maintain industry alignment as initially intended by the NSIAC initiative. This achieves two goals:
 - ◆ implementation of consistent standards, programs, and practices to meet the same objective of providing high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety, and
 - ◆ provides a regulatory framework that is consistent for the NRC to verify, through inspections, that licensees have a clearly documented security program to meet specific regulatory requirements

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■ Revision Attributes

- Incorporate lessons learned over past two decades through
 - ◆ NRC Inspection activities
 - ◆ New/Updated/Revised Guidance
 - ◆ Resolution of Security Frequently Asked Questions (SFAQs)
 - ◆ Benchmarking and sharing of Operating Experience (OE)
 - ◆ Internal audits and self-assessments

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■ Revision Attributes, continued

- Streamlined overall document through reorganization of sections and flow of information for readability, improved alignment with regulations, and elimination of redundant and unnecessary information
- Combine Revisions 7 and 7.1 into one template
- Edited and/or added bracketed text to include guidance for licensees to edit/add appropriate level of site-specific information, as applicable
- Edited to better align with regulatory terminology
- Adjusted formatting for clarity with implementation
- Portion marked for proper designation of specific information

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- Supporting Document – Sample revision matrix summary of changes
 - Next Slide

Section	NEI 03-12, Revision 7/7.1 Language	NEI 03-12, Revision 8 Language	Description of change
Cover page, headers, and table of contents	[Current text]	[Current text]	<p>Changed revision identifier from 7.1.1 to 8.</p> <p>Changed dates respectively from October 2011 and January 2018 to April 2024 (note: this date will be adjusted to coincide with final publications).</p> <p>Total number of pages from 119 to 157 (note: the page count number will be adjusted with final publication to ensure accuracy).</p> <p>Changed title for consistency throughout the document. Expanded for licensee applicant options regarding HSPS and new construction.</p> <p>Added guidance for completing the template for transitioning to a site-specific document. General summary of changes throughout include but are not necessarily limited to:</p> <p>Table of contents reoriented accordingly with movement, addition or relocation of specific information from original sections identified below. Removed specific language information from original Sections headers 8.3.1 and 9.3.2 and reformatted information within appropriate section.</p> <p>Portions marked document for proper designation of specific information. Editorial and formatting changes throughout.</p> <p>Added bold font to all bracketed text for ease of differentiating between template text and guidance for adding site-specific information. Added notes in red text and visible traces for direction guidance. Initialed defined terms.</p> <p>Applied use of acronyms and deleted those not used throughout.</p> <p>Moved/combined sections, separated paragraphs into several paragraphs and reordered sentence structure for clarity and improved flow of the overall document.</p> <p>Minor editing for clarity.</p>

Section	NEI 03-12, Revision 7/7.1 Language	NEI 03-12, Revision 8 Language	Description of change
New 2.5	N/A		Added new bracketed text for licensees that must adhere to requirements of Subpart B to Part 73.
4. New 3.	Establishment of Security Organization [Current text]	3. (U) Establishment of Security Organization	<p>Formatted section from one paragraph to two. Edited for clarity and elimination of redundant information. Moved the bracketed text to Section 18 (formerly 22), Records, adding sub-section 18.14, Contracted Security Services, since this information is specific to records retention requirements.</p> <p>Moved the last sentence up to add to the end of the first paragraph to improve flow of information.</p>
5.	Qualification for Employment in Security [Current text]	N/A	Deleted to eliminate redundancy of information. Although referenced within 18 CFR 73.55 (c) Security plans and (d) Security organization, this information is not necessarily relevant to the Physical Security Plan, and as indicated the subject information is included within the Training and Qualification Plan.
10.	Work Hour Controls [Current text]	N/A	Removed information as the requirements for work hour controls are governed under 10 CFR Part 26, which is implemented in accordance with the license fitness for duty program for specifically identified individuals/work groups. 10 CFR 73.55 (b)(9)(ii)(B) (element of the insider mitigation program) is the only reference to the part 26, to which is not relative to part 26, subpart I, work hours.

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- Requested Outcome
 - NRC endorsement of NEI 03-12, Revision 8, Template Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan by October 2024.