

~~SECURITY RELATED INFORMATION~~  
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Guidance on Submitting Security Plan Changes  
Nuclear Energy Institute (NEI) 11-08 (Revision 0)

NEI 11-08 Location	NEI 11-08 Text	Revised Text for Consideration	U.S. Nuclear Regulatory Commission Staff Comment and Technical Basis
N/A – General Comment	NEI 11-08 [Revision 0] is marked as Title 10 of the <i>Code of Federal Regulation</i> (10 CFR) 2.390	N/A	Provide the basis for withholding the document from public disclosure under the provisions of 10 CFR 2.390.
N/A – General Comment	N/A	N/A	10 CFR 50.34(c) and 73.55(c)(6) require a Cyber Security Plan. Consideration should be given to future revision of NEI 11-08 to include additional guidance specific to Cyber Security Plan changes.
N/A – General Comment	N/A	N/A	The document uses to the terms “security plan, security plans, NEI 03-12, and security plan template” interchangeably in several places. There are four required security plans, being the Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and the Cyber Security Plan. Make sure these terms are used consistently throughout the document.

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Enclosure

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Executive Summary, 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence	NEI is issuing this guidance to provide information for licensees to consider when submitting security plan change(s), to the Nuclear Regulatory Commission (NRC).	NEI is issuing this guidance to provide information for licensees to consider when making a determination relative to the appropriate licensing action under which change(s) to the security plans required under the provisions of 10 CFR Part 50, sections 50.34(c) and 50.34(d), can be made.	This purpose statement should focus on the determination process when making security plan changes. It is understood that this guidance should help a licensee determine the applicable licensing action under which a plan change can be submitted. Reference to 10 CFR Part 50 is considered appropriate to identify required plans.
Executive Summary, 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> sentence	The security plan consists of the Physical Security Plan (PSP), Training and Qualification Plan (T&QP) and the Safeguards Contingency Plan (SCP).	The required security plans consist of the PSP, T&QP, SCP, and the Cyber Security Plan (CSP).	Editorial Comment. Clarification is needed to identify the CSP.
Executive Summary, 1 <sup>st</sup> paragraph, 3 <sup>rd</sup> sentence	This guidance is intended to assist the licensee in determining types of information to analyze when considering whether to submit a 10 CFR 50.90 or a 10 CFR 50.54(p) plan change;	This guidance is intended to assist the licensee in determining the appropriate licensing action for a specific security plan change and the types of information that should be identified, reviewed, and analyzed to support the determination or conclusion that the security plan change meets the provisions of 10 CFR 50.90 or 50.54(p), prior to submitting the security plan change to the NRC.	Clarification is needed to ensure the intent of this guidance is understood. The focus of this guidance should be making appropriate licensing action determinations for a given plan change. To do this, the guidance provides the types of information that should be identified, reviewed, and analyzed to make a determination and support the licensee's conclusion.

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Executive Summary, 1 <sup>st</sup> paragraph, 3 <sup>rd</sup> sentence	However, the guidance contained within this document does not determine for the licensee whether a 50.90 or a 50.54(p) should be submitted.	However, the guidance contained within this document does not determine for the licensee whether a 50.90 or a 50.54(p) is the appropriate licensing action.	Editorial Change for clarity.
Executive Summary, 1 <sup>st</sup> paragraph, 4 <sup>th</sup> sentence	The licensee has final responsibility for determining what type of plan change is submitted, based on the nature and impact(s) of the change being implemented.	The licensee is responsible for making the final determination for what type of licensing action is submitted to the NRC for each plan change made.	The focus of this sentence should be the licensee responsibility to determine what licensing action will be used to submit a plan change to the NRC. The information presented in later sections of this guidance provides the types of information upon which this determination should be based.
Executive Summary, bullet marked a.	licensees who desire to make a change that would decrease the safeguards effectiveness of the PSP, T&Q, and SCP are required to submit an application for license amendment in accordance with 10 CFR 50.90.	licensees who submit a security plan change that would decrease the safeguards effectiveness of the PSP, T&QP, CSP, and/or SCP must submit an application for license amendment to the NRC for review and approval prior to implementing the security plan change in accordance with 10 CFR 50.90.	Delete the phrase “desire to” and replace with the word “submit.” The requirements of 10 CFR 50.90 apply to submitted changes, not desired changes. Add reference to the CSP for consistency with 10 CFR 50.34(c) and 73.55(c)(6). Add the letter “P” to T&Q.

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Executive Summary, bullet marked b.	b. licensees who intend to submit changes that do not decrease the safeguards effectiveness of the PSP, T&Q, and SCP are required to submit a report containing a detail description of each change, within two months after the changes are made, in accordance with 10 CFR 50.54(p)(2).	b. licensees who submit a security plan change that does not decrease the safeguards effectiveness of the PSP, T&QP, CSP, and/ or SCP are required to submit a report containing a description of each security plan change within two months after the security plan change is implemented at the site, in accordance with 10 CFR 50.54(p)(2).	Delete the phrase "intend to." The requirements of 10 CFR 50.54(p)(2) apply to submitted changes, not intended changes. Add reference to the CSP for consistency with 10 CFR 50.34(c) and 73.55(c)(6). Add the letter "P" to T&Q.
Executive Summary, 2 <sup>nd</sup> paragraph, 1 <sup>st</sup> sentence	The NRC is responsible for licensing and regulating nuclear facilities and materials, and for conducting research in support of the licensing and regulatory process.	Delete	This information is not necessary and should be deleted.
Executive Summary, 2 <sup>nd</sup> paragraph 2 <sup>nd</sup> sentence	The NRC meets these responsibilities in part, through Standard Review Plans, Internal Staff Guidance, technical reviews, and studies specific to new technologies that may be used at NRC licensed facilities.	Delete	This information is not necessary and should be deleted.

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Executive Summary, 2 <sup>nd</sup> paragraph 3 <sup>rd</sup> sentence	The NRC recognizes that as new technologies/or technologic improvements become available, the established guidance may not provide sufficient information relative to how these advanced technologies can be used within the regulatory framework.	Delete	This information is not necessary and should be deleted.
Executive Summary, 2 <sup>nd</sup> paragraph, 4 <sup>th</sup> sentence	This guidance is intended to provide technical information that should be considered by licensees who choose to utilize Remotely Operated Weapons System (ROWS) technology as a component of their site protective strategy.	This guidance provides analytical concepts and technical information that can be applied to all proposed security plan changes. The examples provided by this guidance and Attachment 1, apply these concepts to the types of information that should be considered by licensees who choose to utilize ROWS technology as a component of their site protective strategy.	Clarification needed. The intent of this guidance is already discussed above. Therefore, the word “intended” should be deleted. This guidance provides generic analytical concepts and information that can be used by licensees in analyzing all plan changes, to include changes related to the implementation of ROWS.
Executive Summary, 3 <sup>rd</sup> paragraph, 1 <sup>st</sup> sentence	In November 2011, the NRC endorsed Revision 7 of NEI 03-12 “Security Plan Template”,	In November 2011, the NRC endorsed Revision 7 of NEI 03-12 “Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Program],” dated October 2011, hereafter referred to as the “Security Plan Template.”	The official title of NEI 03-12 as endorsed by the NRC should be used.

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Executive Summary, 3 <sup>rd</sup> paragraph, 1 <sup>st</sup> sentence	Which contains generic language that may be used by licensees choosing to implement ROWS as part of the site protective strategy.	Revision 7 of the Security Plan Template contains generic language that, if applicable to the site-specific conditions, may be used by licensees choosing to implement ROWS as part of the site protective strategy.	Editorial Comment for sentence structure. This should be a separate sentence and add "if applicable" to clarify that each licensee is responsible to verify that the generic language of NEI 03-12 applies to their site conditions. 10 CFR 73.55(c)(1)(ii).
Executive Summary, 3 <sup>rd</sup> paragraph	N/A	In addition to the generic language for ROWS provided in Revision 7 of the Security Plan Template, the licensee should also consider appropriate changes to the site CSP relative to the digital/cyber based features of ROWS.	Clarification needed. Because the CSP is not part of NEI 03-12, the licensee should consider the digital/cyber components of ROWS and whether or not ROWS should be addressed in the CSP.
Executive Summary, 3 <sup>rd</sup> paragraph, 2 <sup>nd</sup> sentence	Regardless of the nature of the change a licensee intends to submit, it is the responsibility of the licensee to ensure that all changes remain consistent with the NRC endorsed generic language contained in NEI 03-12, Rev. 7.	Regardless of the nature of the plan change the licensee makes, it is the responsibility of the licensee to ensure that all security plan changes are consistent with regulatory requirements and are described in the security plans.	Clarification needed for consistency with 10 CFR 73.55(a)(2) and (3).

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Executive Summary, 3 <sup>rd</sup> paragraph	N/A	Where the generic language contained in the Security Plan Template is not applicable or does not adequately describe site-specific conditions, the licensee should consider providing appropriate site-specific information to the security plan to ensure that the nature of the plan change is clearly described and how implementation of the security plan change will satisfy regulatory requirements.	Clarification needed for consistency with 10 CFR 73.55(a)(2) and (3).
Executive Summary, 4 <sup>th</sup> paragraph, 1 <sup>st</sup> sentence	For those licensees who intend to submit a security plan change that will result in a reduction in staffing, the licensee must provide sufficient detailed information for perspective reviewers to understand the nature of the change and the impacts to the regulation(s) and site security plan commitments.	For those licensees who are considering a security plan change that will reduce the staffing levels for armed responders (AR) and/or armed security officers (ASO), or will add, modify, or remove a security measure, the licensee must provide information that is sufficient to understand the nature of the change, the impacts that the change will have on the licensee's security program, and the impact that the change will have on the continued ability of the licensee to meet regulatory and security plan requirements.	Clarification Needed. The phrase "intend to" is not appropriate. The correct phrase is "staffing levels." Add position titles of ARs and ASOs. Add the phrase "add, modify, or remove a security measure." The same level of information is needed to understand changes to security measures. This statement should clarify that the licensee is responsible to consider other changes associated with ROWS and not limit consideration to only staffing levels.

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Executive Summary, 4 <sup>th</sup> paragraph, 2 <sup>nd</sup> sentence	Licensees should identify the purpose of the change and provide an explanation supported by the analysis conducted on how the reduction in staffing does not reduce the safeguards effectiveness of the previously NRC reviewed site security plan.	Licensees should identify in their security plan change submittal, the purpose for the plan change, supporting information gained through the analysis conducted, and description/explanation of how the plan change (i.e., reduction in staffing levels or removal of a security measure associated with ROWS) does not reduce the safeguards effectiveness of the security plan(s).	Clarification needed to facilitate understanding of the plan changes and the types of information that should be included in a plan change submittal to facilitate NRC's review.
Executive Summary, 4 <sup>th</sup> paragraph, 3 <sup>rd</sup> sentence	The submitted change should include details contained in the site protective strategy in conjunction with identifying and explaining how the reduction in staffing continues to meet regulatory requirements as described in 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage"	The submitted plan change should describe how actions required by the site protective strategy continue to be accomplished in conjunction with explaining how the reduction in staffing levels or removal of security measures continues to meet the requirements of 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage" and other security plan requirements.	A description of how the actions required by the site protective strategy continue to be accomplished should be part of the security plan change submittal in conjunction with explaining how the change continues to meet regulatory and security plan requirements.

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Section 1, “Security Plan Items to Consider,” 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence	A thorough review is required to be performed for any perspective Security Plan Change. Changes made to one section of the Security Plan may affect other sections of the Security Plan or regulatory requirements.	A thorough review and analysis is necessary for each security plan change. Changes made to one section of a security plan may impact other sections of the security plan/plans, and/or the licensee’s continued ability to meet regulatory and security plan requirements.	Editorial Comment.
Section 1, “Security Plan Items to Consider,” 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> sentence	It is necessary to identify those impacts to determine if a reduction of safeguards effectiveness is realized in other areas not specifically being addressed by the change.	It is necessary that each licensee identify impacts through review and analysis to determine if a reduction of safeguards effectiveness is realized in other areas of the security program not specifically being addressed by the security plan change.	Editorial comment.
Section 1, “Security Plan Items to Consider,” 2 <sup>nd</sup> paragraph, 1 <sup>st</sup> sentence	The licensee should consider all impacts the change in strategy will ultimately have on existing Site Security Programs and whether those programs continue to meet requirements.	The licensee should identify and consider the impacts that a change in strategy will ultimately have on existing site security programs and whether those programs continue to meet security plan and regulatory requirements.	Editorial comment.

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Section 1, “Security Plan Items to Consider,” 2 <sup>nd</sup> paragraph, 2 <sup>nd</sup> sentence	When submitting a security plan change, provide an evaluation explaining impacts to Site Security Programs and how these programs continue to meet regulatory requirements.	The licensee should provide as part of the security plan change submittal, an evaluation of the identified impacts to site security programs and an explanation of how these programs continue to meet regulatory and security plan requirements.	Editorial comment.
Section 1, “Security Plan Items to Consider,” 3 <sup>rd</sup> paragraph, 1 <sup>st</sup> sentence	Regardless of whether the licensee chooses to submit a 50.90 or a 50.54(p) for ROWS, the information included as part of the security plan change submittal package should provide a sufficient level of detail that describes the concept that the licensee is trying to accomplish.	Regardless of the licensing action that is determined to be appropriate for a given plan change, the licensee should provide, as part of the security plan change submittal package, a detailed explanation of what the plan change is trying to accomplish and the rationale supporting the licensee’s conclusion that the licensing action taken is appropriate.	The licensee determines (not chooses) the appropriate licensing action. Reference to ROWS should be removed as this statement is not an example. Reference to ROWS (as stated at front) should be reserved for examples of how to apply the concepts.
Section 1, “Security Plan Items to Consider,” 4 <sup>th</sup> paragraph, 1 <sup>st</sup> sentence	If the intent is to remain within the bounds of a 50.54(p) plan change, it is important that the licensee provide a detailed explanation of what has been changed and how it is not a decrease in safeguards effectiveness of the previously NRC reviewed site security plan. Items to consider include, but are not limited to	If the intent is to remain within the requirements of a 50.54(p), the licensee should provide a detailed explanation of what has been changed and how it does not decrease in the safeguards effectiveness of the security plan. For example, in the case of ROWS, items to consider include, but are not limited to:	Editorial comment. Delete the phrase “previously NRC reviewed site security plan.” Add ROWS as the example. Add colon after “but not limited to”

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Section 1, “Security Plan Items to Consider,” 4 <sup>th</sup> paragraph, 1 <sup>st</sup> sentence	1) describe how a reduction in staff does not reduce effectiveness of the strategy, including how the functions that were performed are absorbed, modified, or no longer required.	1) describe how a reduction in staffing levels and/or addition, modification, or removal of a site security measure, does not reduce the effectiveness of the security plan or protective strategy, including how the functions that were previously required are absorbed, modified, or no longer required,	Editorial comment. Replace the word “staff” with “staffing levels.” Add the phrase “and/or addition, modification, or removal of a site security measure”
Section 1, “Security Plan Items to Consider,” 4 <sup>th</sup> paragraph, 1 <sup>st</sup> sentence	and 2) in regards to staffing reduction, whether the licensee intends a reduction in Armed Responders as opposed to Armed Security Officers, and	2) in regards to staffing level reductions, whether the change involves a reduction in Armed Responders, Armed Security Officers, or both, and;	Editorial comment. Delete the word “and” prior to the listed #2. Add semi-colon after the word “and” before the number 3.
Section 1, “Security Plan Items to Consider,” 4 <sup>th</sup> paragraph, 1 <sup>st</sup> sentence	3) the role and responsibility of the ROWS operator(s). The licensee should be prepared to explain how the change in strategy continues to provide high assurance through effective implementation of the Site Protective Strategy.	3) the licensee should explain as part of the security plan change submittal, how the security plan change continues to provide high assurance through the effective implementation of the security plans and site protective strategy.	Delete the 1 <sup>st</sup> sentence, as this should be identified as a ROWS example prior to beginning the list. Delete the phrase “be prepared to” or clarify the context in which it is used. The licensee is required to provide high assurance as stated in 10 CFR 73.55(b).

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Section 1.1, “Analyze Change,” bullet a.	a. Identify the nature of the changes being made: Equipment installation or removal only; installation or removal of equipment with strategy changes; installation with other physical changes; installation with procedural changes; adding or subtraction responders; etc.	a. Identify the nature of the security plan change being made (e.g., installation or removal of equipment only; installation or removal of equipment with strategy changes; installation or removal of equipment with other physical changes; installation or removal of equipment with procedural changes; adding or subtracting responders; etc.)	Editorial Comment.
Section 1.1, “Analyze Change,” bullet b., 1 <sup>st</sup> sentence	The licensee should identify and analyze all program areas to verify the impact the changes will have to related security program components, equipment, personnel and/or implementing procedures.	The licensee should review and analyze all program areas to identify the impact the security plan change will have to related security program components, equipment, personnel and/or implementing procedures.	Editorial Comment. Review and analysis will identify impacts. Impacts are identified, not verified.
N/A	N/A	Where impacts are identified, the licensee should ensure that appropriate corresponding changes are made to the affected security plans and procedures to account for the identified impacts, and to verify the continued ability to meet security plan and regulatory requirements in all program areas.	This statement is needed to ensure that licensees address identified impacts consistent with the requirement of 73.55(c)(1).

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Section 1.1, “Analyze Change,” bullet b., 3 <sup>rd</sup> sentence	Where functions must be re-assigned, the licensee should also analyze the impact that this additional change will have on the affected program area or position.	Where functions must be re-assigned, the licensee should also review and analyze the impact that this additional change will have on the affected program area or position.	Editorial Comment. Add the word “review” for completeness and accuracy.
Section 1.1, “Analyze Change,” bullet c., 1 <sup>st</sup> sentence	The licensee should summarize the rationale used to analyze the change and the basis for conclusions made.	The licensee should summarize the methodology used to review and analyze the change and explain the rationale supporting the basis for conclusions made.	Editorial Comment. The rationale should be explained relative to supporting the conclusions made. Add the word “review” for completeness.
Section 1.1, “Analyze Change,” bullet c., 3 <sup>rd</sup> sentence	The AR was previously assigned to provide surveillance of an area to the west of the previous position.	The AR was previously assigned to provide surveillance of an area to the west of the previous position concurrent with surveillance by an ASO positioned further to the west.	Editorial Comment:
Section 1.1, “Analyze Change,” bullet c., 4 <sup>th</sup> sentence	This function is now reassigned to an ASO. The strategy is impacted because now only the ASO is able to engage in that area but the new barrier will force the adversary movement to the funneling channel where the AR will engage.	This function is now reassigned to an ASO. The strategy is impacted because now only the ASO is able to engage in that area, however, the new barrier will force the adversary movement to the east along the funneling channel where the AR will engage.	Editorial Comment:

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Section 1.1, “Analyze Change,” bullet d., last sentence	If personnel numbers are reduced, are sufficient numbers of personnel available to ensure that all regulatory requirements and plan commitments are met for all other program areas when compensatory measures are used?	If personnel staffing levels are reduced, are sufficient numbers of armed personnel available to ensure that all security plan and regulatory requirements are met for all other program areas to include when compensatory measures are used?	Editorial Comment. Add the word “armed” before “personnel.” Delete the phrase “plan commitments” and replace with the phrase “security plan and regulatory requirements” to clearly identify that the licensee is required to comply with NRC requirements which are implemented through the security plans.
Section 1.1, “Analyze Change,” bullet e.	N/A	The licensee should consider, as part of the review and/or analysis process, the licensing basis established by the licensee’s Final Safety Analysis Report consistent with the requirements of 10 CFR 50.59, 50.90, and 50.54(p), to ensure that the licensing basis is maintained.	This information should be added consistent with 73.58 and the licensing basis authorizing the safety and security operations at the site. Changes to the licensing basis are controlled in accordance with the requirements of 10 CFR 50.59, 50.90, and 50.54. Any changes to plant and operations not previously described or analyzed, are bounded within the established licensing basis and are addressed in these regulations.
Section 1.1, “Analyze Change,” bullet e.	N/A	This determination can have a direct impact on the licensee’s final determination regarding the appropriate type of licensing action to be taken for the specific security plan change being considered/made.	It is important to consider the information stated in the licensing basis as part of the licensee review and analysis of changes to ensure that the licensing basis is maintained.

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Section 1.1, “Analyze Change,” bullet e.	N/A	For example, licensees planning to implement ROWS should identify and analyze potential consequences to both on-site and off-site equipment, structures, and personnel.	This statement should be made as an example of this concept specific to ROWS and consist with established ROWS guidance.
Section 2, “Security Plan Change Evaluation Criteria,” 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence	The following information should be considered by the licensee when preparing to submit a security plan change.	The following information should be considered by the licensee when reviewing and analyzing a security plan change.	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> sentence	Although these items are not all inclusive, they provide a general overview of the specific information that should be considered in conducting a security plan change evaluation, as well as what should be included in the written security plan change submittal package.	Although these items are not all inclusive, they provide a general overview of the specific types of information that should be considered when conducting a security plan change review and analysis, as well as what information should be included in the written security plan change submittal package.	Editorial Comment. Change the phrase “in conducting” to “ <i>when</i> conducting”

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Section 2, “Security Plan Change Evaluation Criteria,” 1 <sup>st</sup> paragraph, 3 <sup>rd</sup> sentence	For those licensees who intend to submit a security plan change for enhancements or reduce staffing, due to ROWS implementation, the licensee should consider providing in-depth information and explanation on how the perceived changes and or reduction in staffing does not decrease the safeguards effectiveness of the previously NRC reviewed security plan.	The licensee should provide as part of the security plan change submittal, in-depth information and explanation of impact that the plan changes have on the safeguards effectiveness of the security plans. For example, those licensees who are considering a plan change specific to the implementation of ROWS, such as a reduction in staffing levels, the licensee should provide an in-depth explanation for how the specific functions that were previously performed by personnel are now being performed by the ROWS and/or are re-assigned to other personnel.	Delete the phrase “intend to” for consistency with previous comments above. This sentence should be revised and split into two sentences to first provide guidance relative to the information that should be provided in the plan change submittal and second, explain how this generic guidance may be applied to ROWS as an example.
Section 2, “Security Plan Change Evaluation Criteria,” 2 <sup>nd</sup> paragraph	Starting a review process for impact should consider, but is not limited to the following:	The review and analysis process should consider, but is not limited to the following:	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 1, 1 <sup>st</sup> bullet	<ul style="list-style-type: none"> <li>• Protective strategy (e.g. personnel, timelines, equipment or systems necessary to prevent significant core damage and spent fuel sabotage),</li> </ul>	<ul style="list-style-type: none"> <li>• Protective strategy (e.g. minimum number of armed personnel, timelines, equipment or systems necessary to prevent significant core damage and spent fuel sabotage),</li> </ul>	The personnel referenced in this statement are the required minimum number of armed personnel.

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Section 2, “Security Plan Change Evaluation Criteria,” number 1, 2 <sup>nd</sup> bullet	• Blast analysis; determine the location of the vehicle barrier system and consideration for the protection of ROWS equipment, ROWS supporting structures, and ROWS operator protection.	• Blast analysis; determine the minimum stand-off distance and location of the vehicle barrier system to include the protection of ROWS hardware, ROWS supporting structures, ROWS operators, and personnel or equipment used to compensate for inoperable ROWS.	When considering the protection of ROWS and ROWS operators, consideration must also be given to the capability to implement planned compensatory measures for loss of ROWS and/or personnel.
Section 2, “Security Plan Change Evaluation Criteria,” number 1, 3 <sup>rd</sup> bullet	• ROWS operator’s normal duties, and actions, capabilities, etc. in the event the ROWS become inoperable during a contingency event.	• ROWS operator’s normal duties, as well as actions, capabilities, and timelines, etc., in the event that the ROWS become inoperable during a contingency event.	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 1	N/A	• Testing and maintenance of ROWS to include test firing from a representative facsimile using both stationary and moving targets.	The licensee should include discussion of ROWS testing and maintenance to explain how the licensee will provide assurance that the ROWS can and will perform its intended function when needed.
Section 2, “Security Plan Change Evaluation Criteria,” number 2, 1 <sup>st</sup> sentence	2. Review the change against all commitments as delineated within the current NRC endorsed NEI 03-12 “Security Plan Template” to determine potential impacts across the document to include all appendices.	2. Review the change against all security plans and regulatory requirements to determine potential impacts across the document to include all appendices.	Change the word “plan” to “plans”, as the NEI 03-12 template does not contain the CSP. Change the word “commitments” to “regulatory requirements” as the plan describes how requirements are implemented.

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Section 2, “Security Plan Change Evaluation Criteria,” number 3, 1 <sup>st</sup> sentence	3. Review the change against the requirements of 10 CFR 73.58, “Safety/Security Interface Requirements for Nuclear Power Reactors.”	3. Review the security plan change against the requirements of 10 CFR 73.58, “Safety/Security Interface Requirements for Nuclear Power Reactors.”	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 2 <sup>nd</sup> sentence	The licensee should determine that the compensatory measures that would be instituted for loss of new equipment does not have an adverse impact on	The licensee should determine that the compensatory measures that would be instituted for loss of new equipment do not have an adverse impact on:	Editorial Comment. Add a colon after the word “on” to indicate that a list follows.
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 2 <sup>nd</sup> sentence	a) the site protective strategy,	a) the site protective strategy;	Editorial Comment. Replace the comma with a semi-colon as this is a list.
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 2 <sup>nd</sup> sentence	b) implementation of other commitments and	b) implementation of other security plan requirements, and/or;	Editorial Comment. Delete the phrase “plan commitments” and replace with the phrase “security plan requirements.”
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 2 <sup>nd</sup> sentence	c) implementation of regulation.	c) implementation of regulatory requirements.	Editorial Comment.

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Section 2, “Security Plan Change Evaluation Criteria,” number 4, 3 <sup>rd</sup> sentence	For example, if ROWS is being implemented, compensatory measures for its loss needs to consider previous site protective strategies that were effective.	For example, if ROWS is being implemented, compensatory measures for its loss should consider measures that were effectively implemented within previous site protective strategies.	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 4 <sup>th</sup> sentence	If the compensatory measures for the loss of ROWS does not equate to the same level of previous site protective strategies, this would be an area that may be a decrease of effectiveness.	If the compensatory measures for the loss of ROWS do not equate to the same level of effectiveness as measures implemented within previous site protective strategies, a detailed review and analysis should be conducted to fully characterize the nature of the compensatory measures and the differences between the compensatory measures and the previous protective strategy.	Editorial Comment. The phrase “ <u>would be</u> an area that <u>may be</u> ” should be clarified. The intent is to identify a ROWS specific example that would facilitate further review and analysis by the licensee in this area.
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 1 <sup>st</sup> bullet	• Compensatory measures implementation procedures for partial or catastrophic system failures.	• Compensatory measures implementing procedures for partial or catastrophic system failures.	Editorial Comment. Change implementation to “implementing”
Section 2, “Security Plan Change Evaluation Criteria,” number 4, 3 <sup>rd</sup> bullet	• Environmental impact on the ROWS components based on the site’s installation geographical location.	• Environmental impact on the ROWS components operation, function, and/or potential to degrade ROWS performance as a result of the site’s geographical location.	Environmental impacts on components include operation, function, and performance.

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Section 2, “Security Plan Change Evaluation Criteria,” number 5, 2 <sup>nd</sup> sentence	As new equipment is committed to in the security plan, an evaluation needs to be performed to ensure that the appropriate areas are addressed in the training and qualification section.	An evaluation should be performed to ensure that the appropriate training and qualification criteria for new equipment are addressed in the training and qualification plan prior to the installation and/or implementation of new equipment.	Clarification needed. Changes to the T&QP should be identified and made prior to installation and/or implementation of new equipment.
Section 2, “Security Plan Change Evaluation Criteria,” number 5, 3 <sup>rd</sup> sentence	Take into account which position needs to be trained and/or qualified on the use of the new equipment.	Each licensee should take into account the duties and responsibilities that are assigned to each position and the specific knowledge, skills, and abilities required to effectively use of the new equipment in the performance of the assigned duties and responsibilities.	Editorial Comment. Clarification is needed.
Section 2, “Security Plan Change Evaluation Criteria,” number 5, 2 <sup>nd</sup> bullet	• Firearms instructors are trained and qualified ROWS operators certified by a national or state recognized entity on the use of ROWS	• Firearms instructors are trained, qualified, and certified by a national or state recognized entity on the use of the firearm.	Clarification is needed. Firearms instructor T&Q is focused on the firearms, not the ROWS.
Section 2, “Security Plan Change Evaluation Criteria,” number 5, 2 <sup>nd</sup> bullet	N/A	• ROWS instructors are trained and qualified to operate ROWS and if applicable, certified, to instruct others to operate ROWS in accordance with the manufacturer specifications on the use of ROWS.	Separate ROWS instructor training and qualification as it’s own bullet.

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Section 2, “Security Plan Change Evaluation Criteria,” number 5, 3 <sup>rd</sup> bullet	• ROWS and ROWS operators incorporated into Quarterly Shift Drills and Annual Force on Force exercises.	• The use of ROWS and the actions required of ROWS operators are incorporated into Quarterly Shift Drills and Annual Force on Force exercises.	Editorial Comment. Clarification is needed.
Section 2, “Security Plan Change Evaluation Criteria,” number 5, 4 <sup>th</sup> bullet	• Personnel that perform maintenance, testing, calibration and repairs to the site’s ROWS weapons are qualified to perform these functions in accordance with manufacturer’s specifications and site procedures.	• Personnel who perform maintenance, testing, calibration, and repairs to ROWS and ROWS firearms are qualified to perform these functions in accordance with the ROWS and firearms manufacturer’s specifications and site procedures.	Editorial Comment. Clarification is needed.
Section 2, “Security Plan Change Evaluation Criteria,” number 5, 5 <sup>th</sup> bullet	• Armorer(s) are trained and qualified, and possess a current certification for the specific ROWS firearm.	• Armorer(s) are trained and qualified in accordance with Appendix B to 10 CFR Part 73 and possess a current certification for the specific firearm utilized with the ROWS.	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 6, 4 <sup>th</sup> sentence	Examples would be	Examples would include:	Editorial Comment. Consider reformatting the bullets. It is not clear if the bulleted items below are a continuation of subparagraph b)
Section 2, “Security Plan Change Evaluation Criteria,” number 6, 4 <sup>th</sup> sentence	a) spelling out the number of tabletop drills, limited scope drills, and exercises using the reduced numbers of personnel,	a) spelling out the number of tabletop drills, limited scope drills, and exercises that were conducted using the reduced number of personnel, and;	Editorial Comment.

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Section 2, “Security Plan Change Evaluation Criteria,” number 6, 4 <sup>th</sup> sentence	b) the difference between internal responders vs. external from the previous strategy, to include definitive reasons why the change is not a reduction of effectiveness.	b) describing the difference between internal responders vs. external responders used in the previous protective strategy, to include definitive reasons for why the change is not a reduction of effectiveness.	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 6, 1 <sup>st</sup> bullet	• ROWS operators responsibilities, continuously staff the ROWS consoles or redeployed or are they assigned other duties located away from the ROWS console.	• describe the duties and responsibilities of ROWS operators. Do ROWS operators continuously staff ROWS consoles or are they assigned other duties located away from the ROWS console? Describe under what conditions ROWS operators would be re-deployed.	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 6, 2 <sup>nd</sup> bullet	• ROWS system to operator ratio (is greater than 1 ROWS per operator).	• state the ROWS to operator ratio (is this ratio greater than 1 ROWS per operator?).	Editorial Comment.
Section 2, “Security Plan Change Evaluation Criteria,” number 6, 3 <sup>rd</sup> bullet	• Review of State Laws, local ordinance, and company policies and practices that govern the licensee response to incidents of Use of deadly force.	• Review and describe State Laws, local ordinance, and company policies and practices that govern the licensee response to incidents such as of use of deadly force.	Appendix C to Part 73, Section II., paragraph B.3.e. requires that this topic be described in the SCP.

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Section 3, “Security Plan Change Evaluation Criteria for ROWS,” 2 <sup>nd</sup> paragraph, 1 <sup>st</sup> sentence	Attachment 1 to this document provides detailed information for licensees that is pertinent to installation and/or changes to ROWS.	Attachment 1 to this document provides detailed information that is pertinent to security plan changes resulting from the installation and implementation of ROWS.	Editorial Comment.
Section 3, “Security Plan Change Evaluation Criteria for ROWS,” 2 <sup>nd</sup> paragraph, 2 <sup>nd</sup> sentence	This information is examples of items that should be considered and addressed within the security plans and or summary of changes for ROWS implementation based on the Guidelines in “NUREG 0800 Standard Review Plan, 13.6.1 Physical Security—Combined License and Operation Reactors.”	This information includes examples of items that should be considered and addressed within the security plans and/or the summary of changes submitted to the NRC for implementation of ROWS based on the guidelines in “NUREG 0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants,” Chapter 13, “Conduct of Operations,” Section 13.6.1 “Physical Security - Combined License and Operating Reactors.”	Editorial Comment for technical accuracy.
Section 4, “Security Plan Change Template,” 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence	The following template is suggested for use by the licensee when submitting a Security Plan change under 50.90 or 50.54(p), and only serves as a recommendable approach.	The following recommended approach is suggested for use by the licensee when submitting security plan changes to the NRC.	Editorial Comment. Consider revising the formatting/numbering for consistency with other sections within this document.

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Section 4, "Security Plan Change Template," 1 <sup>st</sup> paragraph, 2 <sup>nd</sup> sentence	Licensees should retain this documented evaluation process in accordance with retention requirements of Security Plan changes.	Licensees should retain all documentation used during the security plan change review and analysis process in accordance with the retention requirements of 10 CFR 50.90 or 50.54(p)(2).	Editorial Comment for technical accuracy.
Section 4, "Security Plan Change Template," letter C.	C. Determination of impact to continued regulatory compliance and/or security plan, including implementing procedures.	C. Determination of continued ability to: meet regulatory requirements, meet security plan requirements, perform implementing procedures, and perform programmatic functions.	Editorial Comment for completeness and technical accuracy.
Attachment 1, "Areas of Consideration for ROWS Implementation," 1 <sup>st</sup> paragraph, 1 <sup>st</sup> sentence	Licensees that submit security plan changes due to the implementation of ROWS, should provide a sufficient level of information within the security plans and/or within the summary of change that provides a detailed description on how the perceived changes do not decrease the safeguards effectiveness of the previously NRC reviewed security plans.	Licensees who submit security plan changes for implementation of ROWS, should describe in the security plan how the change implements regulatory requirements and should provide a sufficiently detailed description of the changes within the summary of changes to ensure understanding of how ROWS is used and maintained within the security program, to include how the identified changes do not decrease the safeguards effectiveness of the security plans.	Editorial Comment.

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Attachment 1, “Areas of Consideration for ROWS Implementation,” 2 <sup>nd</sup> paragraph, 1 <sup>st</sup> sentence	Below are examples of items that should be considered and addressed within the security plans and or summary of changes for ROWS implementation based on the Guidelines in “NUREG 0800 Standard Review Plan, 13.6.1 Physical Security—Combined License and Operation Reactors.”	Below are examples of items that should be considered and addressed within the affected security plans and or summary of changes for ROWS implementation based on the guidelines in NUREG 0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants,” Chapter 13, “Conduct of Operations,” Section 13.6.1 “Physical Security - Combined License and Operating Reactors.”	Editorial Comment for technical accuracy
Attachment 1, “Areas of Consideration for ROWS Implementation,” number 1	1. Provide a description within the physical security plan (PSP) that identifies the number of ROWS and ROWS operators and their categorization within the physical protection program and protective strategy including the duties and responsibilities of the ROWS operators.	1. Provide a description within the affected security plan(s) which identifies the number of ROWS, the number of ROWS operators, as well as the categorization of ROWS and ROWS operators within the site physical protection program and protective strategy to include: training and qualification, testing and maintenance, duties and responsibilities, and certification, as appropriate.	Editorial Comment for technical accuracy.