

## SECURITY AREA

### OVERVIEW

The Reactor Oversight Process (ROP) enhancement initiative for the security area included two recommendations, which are discussed below, both of which have been partially accepted. In addition, the staff is currently conducting inspections for full implementation of cyber security at all power reactor licensee sites per inspection procedure 71130.10P, "Cyber Security," dated May 15, 2017. These inspections will continue through 2020. The staff is currently conducting an assessment of the power reactor cyber security oversight program. Feedback from the assessment will be used to develop a future inspection program for cyber security, expected to start in 2021.

### PARTIALLY ACCEPTED RECOMMENDATIONS

The U.S. Nuclear Regulatory Commission (NRC) staff evaluated two recommendations described below as partially accepted.

#### Nuclear Energy Institute (NEI) Recommendation 1C

This recommendation states that the NRC should review security inspections to apply lessons learned from the engineering inspection working group to streamline security procedures, and include credit for licensee self-assessments. The NRC staff evaluated the security baseline inspection program. In the initial phase, the staff reviewed current staff activities and compiled both internal and external stakeholder input to identify areas likely to yield improvements and efficiencies. Based on the results of the initial assessment, the staff identified focus areas for a review of all security baseline inspection program procedures. The staff developed a phase-two assessment charter (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17144A256) to provide guidance and direction for an inspection procedure (IP) review team composed of security inspectors and team leaders from NRC Headquarters and each regional office. During a public meeting on March 2, 2017 (ADAMS Accession No. ML17073A045), the staff presented the objectives and focus areas for the IP review team and obtained feedback from internal and external stakeholders.

The IP review focused on (1) identifying redundancies, (2) identifying opportunities to streamline the inspection process, and (3) verifying that the IPs are consistent with the Commission's direction in Staff Requirements Memorandum (SRM)-SECY-16-0073, "Staff Requirements—SECY-16-0073—Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088," dated October 5, 2018 (ADAMS Accession No. ML16279A345), on the concept of "high assurance." In response to this SRM, NEI provided a letter dated January 26, 2017 (ADAMS Accession No. ML17046A218), providing additional recommendations for staff consideration to improve the security inspection program. The staff identified several opportunities to eliminate redundant IP sample items and potential opportunities for increased inspection efficiency, as noted in the review team's recommendations (ADAMS Accession No. ML17191A402).

The staff issued revisions to the security baseline IPs and inspection manual chapters (IMCs) that became effective January 1, 2019. The staff developed a revised Force-on-Force inspection program framework in response to Commission direction in SRM-SECY-17-0100, "Staff Requirements—SECY-17-0100—Security Baseline Inspection Program Assessment Results and Recommendations for Program Efficiencies," dated October 9, 2018 (ADAMS

Accession No. ML18283A072). This revised inspection program along with a revised significance determination process was provided to the Commission in COMSECY-19-0006, "Revised Security Inspection Program Framework (Option 3) in Response to SRM-17-0100," (ADAMS Accession No. ML19058A094). The staff will continue making relevant inspection program document changes based on the working group recommendations and the Commission's direction in SRM-SECY-17-0100.

### NEI Recommendation 3A.1

This recommendation is specific to the agency's approach to all deterministic significance determination processes (SDPs). The industry further noted that the philosophy of setting policy for the emergency preparedness (EP) SDP should be applied to all deterministic SDPs to the extent practicable, meaning the SDP should be constructed to consider licensee performance in the ROP cornerstones associated with other elements of reactor safety defense-in-depth. The staff developed a charter (ADAMS Accession No. ML19067A203), to provide guidance and direction for an SDP task force composed of security inspectors, enforcement specialists, and program office specialists from NRC Headquarters and each regional office.

The task force solicited both internal and external stakeholder input during several meetings. The team also evaluated the defense-in-depth philosophy suggested for the EP SDP model. Based on the evaluation and input, a defense-in-depth approach was incorporated into the changes to the security SDP to the extent practicable.

The task force recommended that the staff update the security baseline inspection program SDPs. The task force incorporated the IP review team's recommendations and ensured that the SDPs reflect the concept of "high assurance" of adequate protection in the security regulations, which is equivalent to "reasonable assurance" as described in SRM-SECY-16-0073 (ADAMS Accession No. ML16279A345), and an appropriate level of risk-informed decision-making during the assessment of findings.

Based on the task force recommendations, the staff issued a revision to IMC 0609, Appendix E, Part I, "Baseline Security Significance Determination Process for Power Reactors," on September 17, 2018 (ADAMS Accession No. ML18164A326). The staff revised this document in response to SRM-SECY-16-0073 (ADAMS Accession No. ML16279A345), and the March 2017 assessment team review. All changes made during this revision were based on the objective to increase consistency and predictability, and these changes aligned with the clarity principle of good regulation. The staff notified the Commission of this revision through a Commissioner Assistants Note on July 30, 2018 (ADAMS Accession No. ML18165A297).

Based on SRM-SECY-17-0100, the staff will submit additional changes to the SDP, specifically the force-on-force SDP, to the Commission for approval.

### **STAKEHOLDER VIEWS**

There were no additional stakeholder views noted.