



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PLEASE RESPOND BY:
February 7, 2020

January 23, 2020

COMSECY-20-0004

MEMORANDUM TO: Chairman Svinicki
Commissioner Baran
Commissioner Caputo
Commissioner Wright

FROM: Margaret M. Doane *Margaret M. Doane*
Executive Director for Operations

SUBJECT: REDUNDANT REPORTING OF SECURITY PERFORMANCE
INDICATORS TO THE COMMISSION

The purpose of this paper is to recommend discontinuing the redundant reporting of performance indicators (PIs) in the security cornerstone of the U.S. Nuclear Regulatory Commission's (NRC's) Reactor Oversight Process (ROP). At present, the Commission receives reports on security-related PIs through multiple paths; therefore, the staff explored avenues to consolidate these efforts.

In "Staff Requirements Memorandum (SRM) - SECY-07-0136, Recommendation to Discontinue Two of Three Performance Indicators Associated with the Security Reactor Oversight Process," dated September 13, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072560811 (non-public)), the Commission approved the discontinuation of the use of two of three security PIs used to assess licensee performance but directed the staff to "continue evaluating possible additional PIs for the security cornerstone [of the NRC's ROP]."

Following the SRM, the only remaining security PI concerns intrusion detection system availability. The Office of Nuclear Security and Incident Response (NSIR) has continued to report information on the status of potential additional security-related PIs to the Commission annually, in response to SECY ticket number 20070335 (example, ADAMS Accession No. ML19056A433). Since the SRM in 2007, NSIR has not identified any need for additional security-related PIs.

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Each year, the staff provides the Commission with assessments related to the ROP inspection program through the annual self-assessment. The most recent self-assessment was presented in SECY-19-0037, "Reactor Oversight Process Self-Assessment for Calendar Year 2018," dated April 12, 2019 (ADAMS Accession No. ML19042A100). The ROP self-assessment process uses program evaluations and performance metrics to determine success in meeting the goals and intended outcomes of the ROP. As part of this process, NSIR provides information on the single remaining security PI as well as its assessment of potential additional security-related PIs within the discussion of ROP program area evaluations.

Based on SECY-19-0067, "Recommendations for Enhancing the Reactor Oversight Process," dated July 16, 2019 (ADAMS Accession No. ML19070A036), the Office of Nuclear Reactor Regulation formed a working group to evaluate and submit recommended enhancements to the ROP, including the physical security inspection program. In addition, as part of the current security inspection oversight process, NSIR continues to assess the physical security inspection program for enhancements and efficiencies based on physical security operating experience, inspection results, inspection procedures, oversight visits, and periodic reviews of the inspection procedures and Inspection Manual Chapters. Because the annual ROP self-assessment SECY provides an opportunity to update the Commission on enhancements to the security oversight program, including the effectiveness of existing PIs or the need for new ones, the staff believes that it would improve efficiency to consolidate all of its current reporting on security PIs into the ROP self-assessment.

As such, the staff requests that the ticketed staff action item in SRM-SECY-07-0136 be rescinded in order to reduce redundant reporting and streamline the reporting process. Under the staff's proposal, the staff would continue to include a discussion on the remaining PI related to intrusion detection system availability in the ROP self-assessment as part of the ROP program area evaluations.

SECY, please track.

cc: SECY
OGC
OCA
OPA
CFO

SUBJECT: REDUNDANT REPORTING OF SECURITY PERFORMANCE INDICATORS
TO THE COMMISSION

DATE: January xx, 2020

ADAMS Accession No. ML19302F645

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