

SECURITY DISCRETIONARY INSPECTION PROGRAM

2202B-01 PURPOSE

This appendix is provided to identify the security discretionary portion of the inspection program that provides diagnostic inspections of identified problems, issues and events beyond the security core inspection program that contribute to the assurance of protection of public health and safety and security at decommissioning nuclear power reactors.

2202B-02 OBJECTIVES AND PHILOSOPHY OF DISCRETIONARY INSPECTIONS

02.01 Discretionary inspections for the security inspection program are designed to support the U.S. Nuclear Regulatory Commission's (NRC's) goals of: (1) protecting public health and safety; (2) promoting the common defense and security; (3) and protecting the environment. While the security core inspection program and resultant inspection findings should provide sufficient information to allow the NRC to meet the goal of assuring that licensees are maintaining safety at their facilities with an absence of significant performance issues, additional discretionary inspections may be required to provide enhanced information regarding physical security at facilities where significant performance issues have been identified. These performance issues may be identified either through NRC inspections or licensee-identified activities.

02.02 The breadth and depth of a discretionary inspection increase in proportion to the relative significance of an identified performance issue and are based on the guidance provided in NRC Management Directive (MD) 8.3, "NRC Incident Response Program," and NRC MD 8.9, "Accident Investigation."

2202B-03 APPLICABILITY

Security discretionary inspections referenced in Inspection Manual Chapter (IMC) 2202, "Security Inspection Program for Decommissioning Nuclear Power Reactors," apply to decommissioning nuclear power reactor licensees and are to be conducted by NRC regional security inspectors.

2202B-04 RESOURCES

Resources needed to conduct a discretionary inspection may vary considerably due to the complexity of the issue(s) and the thoroughness of the licensee's own evaluations and proposed

corrective actions. Security-related discretionary inspections will be funded by the appropriate NRC headquarters program office.

2202B-05 DOCUMENTATION

The inspection report written for a discretionary inspection should contain the NRC's assessment for each inspection requirement. Inspection documentation is pursuant to IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports." Security information designation guidance will be adhered to for all inspection reports, temporary instructions, orders, etc., that contain or have the potential to contain safeguards or other sensitive security information. These documents shall be marked and controlled in accordance with NRC MD Volume 12, "Security," or the agency's guidance on sensitive unclassified non-safeguards information as necessary.

2202B-06 SIGNIFICANCE DETERMINATION FOR DECOMMISSIONING NUCLEAR POWER REACTORS

IMC 2202 contains program requirements for decommissioning nuclear power reactors. The significance of findings at decommissioning nuclear power reactors should be determined using Traditional Enforcement as described in the NRC Enforcement Policy.

2202B-07 DESCRIPTION OF SECURITY DISCRETIONARY INSPECTION PROGRAM

06.01 Generally, the security discretionary inspection program focuses on a deeper and broader independent assessment of licensee actions as the safety or security significance of a performance issue increases. However, if more specificity is needed in a particular program area, this independent assessment can be augmented with procedures selected from the security core inspection program as provided in Appendix A, "Security Core Inspection Program," to IMC 2202. The list includes security core inspection procedures of which portions can be repeated with additional samples for a more comprehensive assessment.

06.02 Objectives of this independent assessment are to ensure that the licensee has properly identified the scope (extent) of a significant performance issue and that the proposed corrective actions are sufficiently comprehensive. Any new issue identified during a security discretionary inspection will be evaluated by the inspector using the guidance provided in the NRC Enforcement Policy.

2202B-08 ASSESSING INSPECTION FINDINGS

If during implementation of a security discretionary inspection, a significant weakness is identified in the licensee's evaluation of the performance issue, the inspection may be expanded

as necessary to independently acquire the information necessary to satisfy inspection requirements. See additional discussion in IMC 2202.

END

Attachment 1: Revision History for IMC 2202, Appendix B

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Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession No. (Pre-Decisional, Non-Public Information)
	ML13234a295 10/06/14 CN 14-023	Initial issuance. Researched commitments for the last 4 years and none found.	N/A	ML14165A057
	ML20050N515 07/28/20 CN 20-035	Revised to make procedure publicly available and made format changes.	N/A	ML20050N516