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## INSPECTION MANUAL CHAPTER 2201 APPENDIX D

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### FACILITY STATUS REVIEWS FOR SECURITY AND SAFEGUARDS INSPECTION PROGRAM

Effective Date: January 1, 2024

#### 2201D-01 OBJECTIVES AND PHILOSOPHY OF FACILITY STATUS ACTIVITIES

The security inspection program and the Reactor Oversight Process recognize that regional-based, headquarters-based, and resident inspectors have a joint responsibility, outside of inspection-specific activities, to be aware of plant and site conditions on a routine basis. This appendix provides guidance on the conduct of facility status reviews for the security inspection program.

Inspectors' knowledge of facility status is important in the inspection process for determining how to select and implement the appropriate baseline inspection procedures. Facility status reviews should include the potential impact that emergent plant issues, potential adverse trends, current equipment problems, and ongoing activities may have on security at the facility. Based on the knowledge gained through a facility status review, regional-based, headquarters-based, and resident inspectors are expected to make adjustments to their inspections so that they can inspect activities which are of higher significance, either from a risk perspective or based on security considerations. For example, if the facility status review reveals that there will be onsite construction, regional- and headquarters-based inspections may be planned to focus on access control and access authorization during the period of onsite construction.

#### 2201D-02 APPLICABILITY

The conduct of facility status reviews as outlined in this document applies to security and are to be conducted by regional-based, headquarter-based, or resident inspectors.

#### 2201D-03 RESOURCES

The resource estimate for facility status reviews is an estimate only, and may vary considerably due to current threat conditions, complexity of facility issue(s), and the thoroughness of the licensees' own evaluations and proposed corrective actions.

- a. Regional and headquarters-based inspectors. Facility status reviews should be charged to the inspection procedure being used by the inspector.
- b. Resident inspectors. Facility status reviews should be charged to Inspection Manual Chapter (IMC) 2515, Appendix D, "Plant Status." This activity should not exceed 2 hours per month unless a special information collection activity, such as an audit, is required. Special or supplemental inspections such as temporary instructions (TIs) should be charged to the appropriate TI number and not considered part of the facility status review.

## 2201D-04 DOCUMENTATION

- a. The inspection findings associated with facility status reviews should be documented in accordance with the guidance of IMC 0611, "Power Reactor Inspection Reports." The inspection report should contain the U.S. Nuclear Regulatory Commission's (NRC's) assessment for each inspection requirement included within the scope of the status review.
- b. Security information designation guidance will be adhered to for all inspection reports (IRs), TIs, etc., that contain or have the potential to contain Safeguards or sensitive security-related information. These documents shall be marked and controlled in accordance the most recent version of Volume 12, "Security" of the NRC's management directives, or the agency's guidance for sensitive, unclassified, non-Safeguards information, as necessary.

## 2201D-05 SIGNIFICANCE DETERMINATION

In addition to other considerations, the determination of significance for findings at commercial power reactors will utilize the general guidance in IMC 0609, Appendix E, "Security Significance Determination Process," to assure consistency and predictability.

## 2201D-06 FACILITY STATUS REVIEWS

The purpose of a facility status review is to gather general information about the overall security posture at the site. This would include, for example, general information on threat conditions, considerations, issues, security force performance, and system and component operation. The goal of this periodic review is to help determine what issues may exist so that inspection resources can be effectively managed and appropriately focused on those activities of higher significance.

The frequency of the facility status review effort will be as described below. This frequency can be adjusted by **regional** or headquarters management based on planned inspection activities or changes to the current threat environment.

- a. Regional and headquarters-based inspectors. Ascertain a **security-oriented** facility status, at least quarterly through conversation with the licensee security point of contact or through a status review associated with the conduct of an inspection. Security issues of significance should be communicated to the resident **inspectors** and **regional Project** branch chief. If necessary, this communication should take place over secure telephone or facsimile lines.
- b. Resident inspectors. Conduct a security-specific status review pursuant to IMC 2515, Appendix D. In general, security-specific status reviews are conducted during the conduct of the overall plant status review at the prescribed frequency. Resident inspectors should attend licensee meetings that provide an overall status of the plant and pertinent ongoing activities, such as those associated with the licensee's plan-of-the-day, shift turnover, emergent work, **operations**, or maintenance, or identified corrective actions. Resident inspectors will communicate items of significance to their regional management.

## 2201D-07 SITE/FACILITY WALKDOWN

The purpose of the site walkdown is to enable the inspector to stay current of facility status, as well as to identify unexpected security conditions that may warrant additional inspection under the security inspection program.

- a. Regional and headquarters-based inspectors. Conduct a facility walkdown during security inspections that provides sufficient detail to complete the sample outlined within the inspection procedure(s). Unexpected system or equipment configurations of significance should be communicated to the licensee and the region. Those configurations of significance should also be communicated to the resident inspector.
- b. Resident inspectors. Conduct site walkdowns pursuant to IMC 2515, Appendix D. However, in general, the security-related portion of the walkdown will be very general (i.e., not detailed) in nature and will normally be conducted while performing normal plant status walkdowns. The residents may consider a periodic, very general, status review of the central alarm station (CAS) and secondary alarm station (SAS) as part of this walkdown. The resident may typically question the on-duty alarm station operator or security officer regarding security or security equipment status, without adversely impacting the conduct of security duties or functions. Although a review of CAS and SAS logs, equipment out-of-service or clearance logs, standing orders, and instructions is not required, it may be beneficial in quickly assessing the licensee's security performance and posture. Unexpected or significant changes to security configurations shall be communicated to the licensee and regional management, as necessary.

## 2201D-08 PROBLEM IDENTIFICATION AND RESOLUTION

Should security-related problems or issues of significance be identified by either the licensee or inspector, the licensee should place the problem or issue into its applicable corrective action program for resolution.

- a. Regional and headquarters-based inspectors. Evaluate and assess the licensee's problem identification and resolution program during the conduct of security inspections. This should include reviewing the licensee's deficiency or non-conformance reports, following up, and assessing the licensee's management review of the particular issue.
- b. Resident inspectors. Pursuant to IMC 2515, Appendix D, ensure that the licensee is informed of the security-related problem or issue of significance and question as to whether the issue will be entered into the licensee's corrective action program. Under certain circumstances, residents may, as directed, verify that compensatory measures have been established to address the problem or issue but will not be required to determine the adequacy of such measures.

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Attachment 1: Revision History for IMC 2201 Appendix D

| Commitment Tracking Number | Accession Number<br>Issue Date<br>Change Notice | Description of Change  | Description of Training Required and Completion Date | Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information) |
|----------------------------|---|--|--|--|
|                            | ML040680551<br>02/19/04<br>CN 04-007            | Initial issuance.  | N/A  |  |
| N/A                        | ML081440383<br>09/08/09<br>CN 09-021            | This document has been revised to remove references to programs other than operating power reactor, and update terminology and format. Title updated to be consistent with the title mentioned in IMC 2515.  | N/A  | ML091380282  |
| N/A                        | ML13234A525<br>09/22/15<br>CN 15-017            | This IMC was revised to reflect minor administrative changes.  | N/A  | ML15209A556  |
| N/A                        | ML18031B004<br>08/20/18<br>CN 18-026            | A periodic review of this document was conducted to ensure consistency with other associated NRC Manual Chapters. Though no technical modifications were made to this document, upon completion of a SUNSI review, the staff concluded that this document should be de-controlled. Consistent with the staff's SUNSI determination, this document has been de-controlled and the SUNSI markings have been removed. | N/A  | ML18288A275  |
|                            | ML18288A268<br>11/01/2018<br>CN 18-037          | An administrative change of this document was conducted to remove the reference to the Memorandum dated October 3, 2008, "Revised Interim Guidance for Security Inspections by Resident Inspectors, Enclosure 1," consistent with feedback form 2201D-2146.  | N/A  | N/A<br><br>2201D-2146<br>ML16039A177   |

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