FINAL SUPPORTING STATEMENT FOR

10 CFR PART 73
PHYSICAL PROTECTION OF PLANTS AND MATERIALS

(3150-0002)
EXTENSION

Description of the Information Collection

The U.S. Nuclear Regulatory Commission (NRC) regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 73, "Physical Protection of Plants and Materials," prescribe requirements for the establishment and maintenance of systems for the physical protection of special nuclear material (SNM) at fixed sites, of SNM in transit, and of plants that use SNM. These include reporting, recordkeeping, and third-party disclosure requirements, which are necessary to ensure adequate protection for nuclear facilities and nuclear material, as follows (this list is not all-inclusive):

- development and maintenance of security documents, including a physical security plan (PSP), training and qualification plan (T&QP), safeguards contingency plan (SCP), cybersecurity plan (CSP), and security implementing procedures

- notification to the NRC of safeguards and cybersecurity events

- notification to State governors and Tribes of shipments of irradiated reactor fuel

- notification to local law enforcement agencies (LLEAs), the Federal Bureau of Investigation (FBI), the NRC, and the Federal Aviation Administration of suspicious activities

- criminal history records check of individuals granted unescorted access to nuclear power facilities or nonpower reactors, or granted access to Safeguards Information (SGI), as defined in 10 CFR 73.2, "Definitions"[1]

- advance notification to the NRC of shipments of irradiated reactor fuel and Category II SNM

[1] SGI refers to information not classified as National Security Information or Restricted Data, which specifically identifies a licensee's or applicant's detailed control and accounting procedures for the physical protection of SNM in quantities determined by the Commission through order or regulation to be significant to public health and safety or the common defense and security; detailed security measures (including security plans, procedures, and equipment) for the physical protection of source, byproduct, or special nuclear material in quantities determined by the Commission through order or regulation to be significant to public health and safety or the common defense and security; security measures for the physical protection and location of certain plant equipment vital to the safety of production or utilization facilities; and any other information within the scope of section 147 of the Atomic Energy Act of 1954, as amended, the unauthorized disclosure of which, as determined by the Commission through order or regulation, could reasonably be expected to have a significant adverse effect on the health and safety of the public or the common defense and security by significantly increasing the likelihood of sabotage or theft or diversion of source, byproduct, or special nuclear material. The NRC is implementing its controlled unclassified information (CUI) program, which will include SGI, but this implementation is on hold until the National Archives and Records Administration issues new guidance.

- submission of fingerprinting cards and identifying information to the NRC for criminal history records checks or firearms background check investigations

- application for standalone preemption authority or combined preemption authority and enhanced weapons authority

Since the last renewal, the NRC issued the final rule "Enhanced Weapons, Firearms Background Checks, and Security Event Notifications," published in the *Federal Register* (FR) and approved by the Office of Management and Budget (OMB) on March 14, 2023 (88 FR 15864). The burden for these requirements was added to the Regulatory Information Service Center / Office of Information and Regulatory Affairs Consolidated Information System (ROCIS) before the submission of the current renewal and continues to be incorporated in this package.

A. JUSTIFICATION

1. Need for and Practical Utility of the Information

The regulations are issued pursuant to the Atomic Energy Act of 1954, as amended, and Title II of the Energy Reorganization Act of 1974, as amended. In general, the reports and records are necessary for one or more of the following reasons:

- Information on the content and planned operation of the licensee's physical protection system (e.g., CSP, PSP, SCP, T&QP) is essential to the NRC's determination of whether the system meets regulatory requirements.

  – For a CSP for nuclear power reactors, this information includes descriptions of how a licensee protects computer and communication systems and networks against cyberattacks, up to and including the design-basis threats described in 10 CFR 73.1, "Purpose and scope."

  – For a PSP for Category I SNM sites and nuclear power reactors, this includes information on capabilities to detect, assess, interdict, and neutralize threats, up to and including the design-basis threats described in 10 CFR 73.1. For other PSPs, it includes descriptions of how the licensee will meet the requirements of 10 CFR 73.67, "Licensee fixed site and in-transit requirements for the physical protection of special nuclear material of moderate and low strategic significance," at a fixed site or during transport.

  – For an SCP for Category I SNM sites and nuclear power reactors, this information includes a description of how licensee personnel implement their physical protection program to defend against threats to their facility, up to and including the design-basis threats described in 10 CFR 73.1.

- For a T&QP for Category I SNM sites and nuclear power reactors, this includes information on the selection, training, equipping, testing, and qualification of individuals responsible for protecting SNM, nuclear facilities, and nuclear shipments.

- Descriptions of the normal operation of the physical protection system (e.g., access authorizations, equipment performance logs) permit the NRC to determine whether there is reasonable assurance that the system operates in accordance with regulatory requirements.

- Reports to the NRC of the occurrence of and circumstances surrounding abnormal events (e.g., theft, sabotage, or overdue shipment) enable the NRC to respond to, investigate, and correct situations that adversely affect public health and safety or the common defense and security.

- Implementation of standalone preemption authority or combined preemption authority and enhanced weapons authority provide enhanced public safety and security resulting from an increased defensive capability to interdict and neutralize an attack at regulated entities.

- Conducting firearms background checks to ensure security personnel authorized to use and access covered weapons, including enhanced weapons, are not prohibited under Federal and State law from accessing these weapons.

The section "10 CFR Part 73 Information Collection Requirements" in this supporting statement lists the specific requirements in 10 CFR Part 73.

2. Agency Use of the Information

The NRC staff reviews the information included in applications, reports, and records to assess the adequacy of each licensee's physical plant, equipment, organization, training, experience, procedures, and plans for the protection of public health and safety and the common defense and security. The staff's review and findings form the basis for NRC licensing decisions related to the physical protection of SNM. The agency has developed a series of regulatory guides on materials and plant protection, which provide guidance on how to meet the requirements above. They can be found at https://www.nrc.gov/reading-rm/doc-collections/reg-guides/protection/rg/. A list of guidance documents pertinent to 10 CFR Part 73 requirements appears in a table at the end of this supporting statement.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would benefit them.

The NRC document Guidance for Electronic Submissions to the NRC provides direction for the electronic transmission and submittal of documents to the NRC.

Documents can be transmitted and submitted electronically through the electronic information exchange process (available from the NRC's "Electronic Submittals" webpage, https://www.nrc.gov/site-help/e-submittals.html), by optical storage media (e.g., CD-ROM, DVD), or by email. The staff estimates that approximately 90 percent of potential responses will be filed electronically. Because of the information security classification level of some documents, licensees sometimes choose to submit responses in hardcopy.

The 53 nuclear power reactor facilities and 20 decommissioning reactor facilities submit all fingerprint data electronically. Materials licensees also submit fingerprint data electronically. Other licensees continue to submit fingerprints on hardcopy fingerprint cards versus electronic submission.

4. Effort to Identify Duplication and Use Similar Information

The regulation in 10 CFR 73.38(d) eliminates duplication by specifying that background investigations do not apply to Federal, State, or local law enforcement personnel who are performing escort duties.

The regulation in 10 CFR 73.38(g) eliminates duplication by specifying that a new fingerprint-based FBI criminal history records check is not required for individuals who have a valid unescorted access authorization pursuant to an NRC order or regulation within 5 years of the effective date of the final rule on spent nuclear fuel (SNF) in transit.

5. Effort to Reduce Small Business Burden

It is possible for licensees that use SNM to be small businesses. However, since inadequate safeguards for SNM would cause the same risks to the common defense and security and to public health and safety whether the licensee were a large or a small entity, the frequency and completeness of reports, records, plans, and procedures cannot be decreased to reduce the burden on small businesses. The NRC staff estimates that none of the current licensees that use SNM and are subject to 10 CFR Part 73 information collection requirements are small businesses.

6. Consequences to Federal Program or Policy Activities If the Collection Is Not Conducted or Is Conducted Less Frequently

If the information collection were not conducted or were conducted less frequently, the NRC might not be notified of safeguards events in time to respond rapidly and help licensees achieve prompt resolution. The NRC receives and evaluates reports as events occur. In addition, the NRC staff inspects compiled licensee records to verify compliance with regulations. Applications for new licenses and amendments may be submitted at any time. Information submitted in previous applications may be referenced without being resubmitted.

7. Circumstances that Justify Variation from Office of Management and Budget Guidelines

Certain sections of 10 CFR Part 73 depart from OMB guidelines by requiring that licensees submit reports to the NRC in less than 30 days. The regulations in 10 CFR 73.26, 73.27, 73.37, 73.67, 73.77, 73.1200, and 73.1215 require immediate notification of response forces, the NRC, and LLEAs; immediate communications between convoys and movement control centers; and immediate notification of consignees and shippers. These notification requirements permit response forces, the NRC, law enforcement authorities, shippers, and consignees to confirm the integrity of shipments, to determine whether SNM has been lost or diverted, and to initiate prompt action to recover it.

Certain other sections of 10 CFR Part 73 depart from the OMB guidelines by requiring licensees to retain records for more than 3 years. Some sections require retention of records for 5 years, or for extended periods such as the duration of possession of the material, duration of employment, or 5 years after termination of access authorization (this list is not all-inclusive). These requirements ensure that procedures for handling and safeguarding nuclear material are available for as long as the licensee possesses the material or operates the facility. Other records are required for inspection or for reconstruction of events in case of a safeguards incident. The burden spreadsheet uploaded as a supplementary document lists all required records retention periods.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the *Federal Register* on December 6, 2024 (89 FR 97078). Four respondents (power reactor licensees and fuel cycle facilities) were contacted by email as part of the consultation process. The NRC did not receive any comments in response to these consultations.

One submission from a private citizen was received on the docket; however, it referenced a blank attachment. The NRC staff attempted to contact the commenter to obtain the attachment but received no response.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Trade secrets and privileged or confidential commercial or financial information are marked as proprietary information and are protected in accordance with NRC regulations in 10 CFR 9.17(a) and 10 CFR 2.390(b).

Certain information, designated as SGI, is prohibited from public disclosure in accordance with the provisions of the Atomic Energy Act of 1954, as amended, pursuant to Chapter 12, Section 147, or is designated as classified National Security Information, in accordance with Executive Order 12958, "Classified National Security Information," dated April 17, 1995.

For criminal history checks, the NRC collects fingerprints, either on hardcopy cards or electronically; digitizes fingerprints captured on cards; and passes the fingerprints electronically to the FBI. The FBI runs the fingerprints and provides the criminal history report to the NRC. The NRC passes this report on to the licensee without retaining a copy of it. This information collection is listed in the NRC's "Privacy Act of 1974; Republication of Systems of Records Notices" (84 FR 71536; December 27, 2019), under the heading of NRC 39, "Personnel Security Files and Associated Records." The NRC does not disclose or share the information with anyone, except when initially submitting fingerprints to the FBI and when passing the FBI report to the licensee.

11. Justification for Sensitive Questions

The regulations in 10 CFR Part 73 require licensees to obtain the criminal history records of individuals who are applying for or currently possess unescorted access to a nuclear power facility or a nonpower reactor. This sensitive information is necessary to allow licensees to determine whether these individuals are qualified to gain and maintain unescorted access to the site.

Reviewing officials use the sensitive information to evaluate an individual's trustworthiness and reliability. Licensees must inform affected individuals that their fingerprints will be used to obtain their criminal history records for review. In addition, licensees must inform the individuals of proper procedures for challenging or explaining their records. Each licensee must establish and maintain a system of files and procedures to protect this sensitive personal information.

The regulation in 10 CFR 73.57(f)(2) requires licensees to protect information obtained from individual criminal history records as follows:

> The licensee may not disclose the record or personal information collected and maintained to persons other than the subject individual, his/her representative, or to those who have a need to have access to the information in performing assigned duties in the process of granting or denying unescorted access to the nuclear power facility, the nonpower reactor facility or access to Safeguards Information. No individual authorized to have access to the information may re-disseminate the information to any other individual who does not have a need to know.

12. Estimated Burden and Burden Hour Cost

The estimated burden is based on the following respondents:

- 2 Category I fuel facilities
- 5 Category II and III facilities
- 53 power reactor sites
- 20 decommissioning reactor facilities
- 29 research and test reactors
- 96 other entities that mark and handle SGI

The estimated number of annual respondents is 205.

The overall estimated annual burden is 482,087.8 hours, at an estimated annual cost of $152.8 million (482,087.8 hours at $317 per hour). This includes 25,724.9 hours for reporting, 432,783.6 hours for recordkeeping, and 23,579.3 hours for third-party disclosure. Detailed burden tables have been uploaded as a supplementary document (Excel spreadsheet).

Burden Summary

	Responses	**Hours**	**Cost at $317/hr**
Reporting	42,106.6	25,724.9	$8,154,793
Recordkeeping	205.0	432,783.6	$137,192,401
Third-Party Disclosure	92,852.7	23,579.3	$7,474,638
Total	135,164.3	482,087.8	$152,821,833

The $317 hourly rate used in the burden estimates is based on the NRC's fee for hourly rates as noted in 10 CFR 170.20, "Average cost per professional staff-hour." More information on the basis of this rate appears in the final rule "Fee Schedules; Fee Recovery for Fiscal Year 2024" (89 FR 51789; June 20, 2024).

13. Estimate of Other Additional Costs

The NRC has determined that the records storage cost is roughly proportional to the recordkeeping burden cost. For a typical clearance, the records storage cost has been calculated as 0.04 percent of the recordkeeping burden cost. Therefore, the records storage cost for this clearance is estimated to be $54,877 (0.04 percent of 432,783.6 recordkeeping hours at $317 per hour).

In addition, the current cost charged to licensees for processing fingerprint cards is $32 per card as of February 1, 2024. The total cost for processing fingerprint cards is $1.6 million (approximately 50,000 cards at $32 per card).

The total additional cost to licensees for recordkeeping and fingerprint card processing is thus $1,654,877 ($54,877 + $1,600,000).

14. Estimated Annualized Cost to the Federal Government

The staff has developed estimates of annualized costs to the Federal Government for conducting this information collection. These estimates are based on staff experience and subject-matter expertise and include the burden of reviewing, analyzing, and processing the collected information, as well as any relevant operational expenses. The estimated cost to the government for the review of required reports and records is approximately $1,426,500 (4,500 hours at $317 per hour), based on the NRC fee rate.

15. Reason for Change in Burden or Cost

The estimated burden has decreased from 501,471 hours to 482,088 hours, for a total decrease of 19,383 hours.

	BURDEN CHANGE					
	Current Burden in ROCIS		**2025 Estimates**		**Changes**	
	Hours	**Responses**	**Hours**	**Responses**	**Hours**	**Responses**
Reporting	24,079	40,985	25,724.9	42,106.6	1,645.9	1,121.6
Recordkeeping	454,567	210	432,783.6	205.0	-21,783.4	-5.0
Third-Party Disclosure	22,825	92,066	23,579.3	92,852.7	754.3	786.7
Total	501,471	133,261	482,087.8	135,164.3	-19,383.2	1,903.3

Recordkeeping estimates decreased due to the number of power reactors sites decreasing from 56 to 53 and research and test reactors decreasing from 31 to 29. In addition, the number of fuel cycle facilities went down from seven to two.

The burden hours for 10 CFR 73.67(e)(3) on the reporting table decreased from 6 hours per response to 1 hour per response because the regulation requires notifications to be made within 1 hour after the discovery of theft or attempted theft or unlawful diversion of SNM. However, no notifications are anticipated under this requirement during the clearance period.

The burden for 10 CFR 73.21 was added to the recordkeeping table on the spreadsheet due to the issuance of NUREG/BR-0531, Revision 1, “NRC Safeguards Information Program: Helpful Resources for Applicants and Preapplicants,” in February 2025, outlining the process that entities can use to request NRC SGI information.

Finally, the fee rate has increased from $279 per hour to $317 per hour.

16. Publication for Statistical Use

None.

17. Reasons for Not Displaying the Expiration Date

The recordkeeping and reporting requirements for this information collection are associated with regulations and are not submitted on instruments such as forms or surveys. For this reason, there are no data instruments on which to display an OMB expiration date. Furthermore, amending the regulatory text of the CFR to display information that, in an annual publication, could become obsolete would be unduly burdensome and too difficult to keep current.

18. Exceptions to the Certification Statement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

None.

10 CFR PART 73 INFORMATION COLLECTION REQUIREMENTS

Section 73.5, "Specific exemptions," provides that under specified conditions, the NRC may grant exemptions from the requirements of the regulations in 10 CFR Part 73, upon the application of any interested person or on its own initiative. The NRC staff examines applications for exemptions under 10 CFR 73.5 to determine whether each requested exemption is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest.

Section 73.15(b) allows licensees to apply to the NRC to receive standalone preemption authority or combined preemption authority and enhanced weapons authority.

Section 73.15(d)(2) requires licensees seeking standalone preemption authority to submit an application to the NRC in writing.

Section 73.15(d)(3) describes the contents of the application for section 161A of the Atomic Energy Act authority, including the licensee's purposes and objectives in requesting standalone preemption authority.

Section 73.15(d)(4) requires licensees that have applied for standalone preemption authority to notify the NRC when their security personnel whose duties require access to covered weapons have satisfactorily completed the firearms background checks in accordance with 10 CFR 73.17, "Firearms background checks for armed security personnel," and when training procedures have been developed and associated training completed.

Section 73.15(e)(2) requires licensees seeking a combined preemption authority and enhanced weapons authority to submit an application to the NRC.

Section 73.15(e)(3) describes the contents of the application for enhanced weapons authority, including the purposes and objectives in requesting combined preemption authority and enhanced weapons authority.

Section 73.15(e)(5) requires licensees that have applied for combined preemption authority and enhanced weapons authority to notify the NRC when their security personnel whose duties require access to covered weapons have satisfactorily completed the firearms background checks in accordance with 10 CFR 73.17 and when training procedures have been developed and associated training completed.

Section 73.15(e)(6) requires licensees submitting applications to do so under oath or affirmation (no additional burden).

Section 73.15(e)(7) allows licensees with enhanced weapons authority to submit a new application to use a different model, caliber, gauge, or quantity of enhanced weapons from that previously approved by the NRC.

Section 73.15(f)(1) requires licensees applying for enhanced weapons authority to submit to the NRC for prior review and written approval new or revised PSPs, T&QPs, SCPs, and weapons safety assessments incorporating the use of enhanced weapons.

Section 73.15(f)(2)(i) requires licensees to identify in their PSP the specific models, calibers, gauges, and numbers of enhanced weapons to be used.

Section 73.15(f)(2)(ii) requires licensees to address in their T&QP the training and qualification requirements to use these specific enhanced weapons.

Section 73.15(f)(2)(iii) requires licensees to address in their SCP how enhanced weapons will be employed by the licensee's security personnel in meeting the NRC-required protective strategy, including tactical approaches and maneuvers.

Section 73.15(f)(2)(iv) requires licensees to evaluate in their safety assessment any potential safety impact on the facility, radioactive material, other property, public or private facilities or property, or members of the public in areas outside of the site boundary from the use of these enhanced weapons. In addition, licensees must examine in the safety assessment any potential safety impact on public or private facilities, public or private property, or members of the public from the use of these enhanced weapons at training facilities intended for proficiency demonstration and qualification purposes.

Section 73.15(f)(3) requires licensees to include information in their T&QP on the use of applicable firearms standards developed by nationally recognized firearms organizations or standard setting bodies, or standards developed by Federal or State agencies.

Section 73.15(g)(1) requires licensees to provide a copy of the NRC's authorization to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Federal firearms license holder with the application to request the ATF's preapproval of the transfer and registration of the enhanced weapons to the NRC licensee.

Section 73.15(g)(3) requires all enhanced weapons possessed by the licensee to be registered under the name of the licensee.

Section 73.15(h) requires licensees to complete and document the completion of training and qualification before use of enhanced weapons.

Section 73.15(k) requires licensees with enhanced weapons to notify the NRC of instances involving adverse ATF findings or ATF notices related to their enhanced weapons.

Section 73.15(m)(9) requires that licensees treat any enhanced weapon that is not returned to their facility as a transferred weapon, and documentation of that situation is required in accordance with 10 CFR 73.15(q).

Section 73.15(o)(1)–(5) requires licensees to perform monthly and annual inventories of any enhanced weapons in their possession, and to retain the records from any periodic inventories of enhanced weapons.

Section 73.15(o)(6) requires licensees to maintain a log of issued tamper-indicating devices placed on locked containers that store enhanced weapons.

Section 73.15(p) requires licensees to notify the NRC and local law enforcement officials if they discover that any of their enhanced weapons are lost or stolen.

Section 73.15(q) requires licensees to maintain records of receipt, transfer, transportation, and inventory of enhanced weapons.

Section 73.15(r)(1) requires licensees that desire to terminate their standalone preemption authority or combined preemption authority and enhanced weapons authority to request NRC approval.

Section 73.15(r)(2) requires licensees that desire to modify their combined preemption authority and enhanced weapons authority to request NRC approval.

Section 73.15(r)(4) requires licensees that have had their standalone preemption authority or combined preemption authority and enhanced weapons authority terminated, suspended, or revoked may reapply by sending a new application to the NRC.

Section 73.15(s)(3) requires licensees that had received confirmatory orders approving authority under section 161A of the Atomic Energy Act must update, within 300 days after the date of publication of the final rule, any procedures, instructions, and training materials developed in response to those orders to reflect the transition from requirements under order to the requirements of the final rule.

Section 73.17(b)(1) states that licenses that have applied for standalone preemption authority or combined preemption authority and enhanced weapons authority must comply with the provisions of this section in conducting firearms background checks. Applicants for authorities under section 161A of the Atomic Energy Act must develop a firearms background check plan that is to be part of the required T&QP for security personnel requiring access to covered weapons as part of their official security duties.

Section 73.17(b)(3) describes the objectives of the firearms background check plan.

Section 73.17(g) requires licensees to notify the NRC Headquarters Operations Center by telephone within 72 hours after removing security personnel from duties requiring access to covered weapons due to the identification or occurrence of any Federal or State disqualifying status condition or disqualifying event that would prohibit them from possessing, receiving, or using firearms or ammunition.

Section 73.17(j) describes the contents of the training licensees are required to provide to security personnel about disqualifying events. This paragraph also requires that licensees include within their firearms background check plan the development and accomplishment of the training modules.

Section 73.17(k)(3) requires licensees to establish procedures to minimize the rejection rate of fingerprint cards due to poor quality and illegible or incomplete information.

Section 73.17(p) requires licensees to provide information to security personnel subject to firearms background checks on the FBI's procedures for appealing a "denied" response to an individual or on providing additional information to the FBI to resolve a "delayed" response. The licensee must provide the individual who has received the "denied" or "delayed" response with the unique National Instant Criminal Background Check System transaction number(s) associated with their specific firearms background check.

Section 73.17(q) requires licensees to establish and maintain a system to protect their records and personal information from unauthorized disclosure.

Subsection 73.20(c) requires that each affected licensee establish, maintain, and follow NRC-approved safeguards physical protection plans and SCPs that describe how the licensee will comply with the requirements of 10 CFR 73(a)–(b). These plans are used to review the adequacy of a licensee's intended security system for compliance and enforcement purposes.

Subsection 73.21(a) requires licensees to establish, implement, and maintain an information protection system that includes the applicable measures for SGI specified in 10 CFR 73.22, "Protection of Safeguards Information: Specific Requirements," and 10 CFR 73.23, "Protection of Safeguards Information-Modified Handling: Specific Requirements," as applicable.

Subsection 73.22(b) requires licensees to determine, based on a background check or other means approved by the NRC, that each individual seeking access to SGI is trustworthy and reliable. The categories of individuals enumerated in 10 CFR 73.59, "Relief from fingerprinting, identification and criminal history records checks and other elements of background checks for designated categories of individuals," are exempt from this requirement.

Subsection 73.22(d) requires that each document or other matter that contains SGI be conspicuously marked at the top and bottom of each page to indicate the presence of such information, and that the first page also contain the following information:

- the name, title, and organization of the individual authorized to make an SGI determination who has determined that the document or other matter contains SGI
- the date the determination was made
- an indication that unauthorized disclosure will be subject to civil and criminal sanctions

Transmittal letters or memoranda to or from the NRC that do not in themselves contain SGI must be marked to indicate that attachments or enclosures contain SGI but that the transmittal letter or memorandum does not. Transmittal documents or other media containing SGI must include the name and title of the certifying official and the date they were designated as containing SGI. Portion marking is required only for correspondence to and from the NRC (i.e., for cover letters, but for not attachments) that contains SGI. The portion marking must be sufficient to allow the recipient to identify those sections of the transmittal document or other information containing SGI, and to distinguish them from those not containing SGI. Documents or other matter containing or transmitting SGI must, at a minimum, include the words "Safeguards Information" to ensure identification of protected information for the protection of facilities and material covered by 10 CFR 73.22, "Protection of Safeguards Information: Specific Requirements."

Subsection 73.22(f) states that when documents or other matter containing SGI are transmitted outside an authorized place of use or storage, they must be packaged in two sealed envelopes or wrappers to preclude disclosure of the presence of SGI. The inner envelope or wrapper must contain the name and address of the intended recipient and be marked on both sides, top and bottom, with the words "Safeguards Information." The outer envelope or wrapper must be opaque and addressed to the intended recipient; it must contain the address of the sender and may not bear any markings or indication that the document or other matter contains SGI.

Subsection 73.23(b) requires licensees to determine, based on a background check or other means approved by the NRC, that each individual seeking access to SGI designated as SGI-Modified Handling (SGI-M) is trustworthy and reliable. The categories of individuals enumerated in 10 CFR 73.59 are exempt from this requirement.

Subsection 73.23(d) requires that a document or other matter containing SGI designated as SGI M be conspicuously marked on the top and bottom of each page to indicate the presence of SGI-M. In addition, the first page of such a document must include the name, title, and organization of the individual authorized to make a determination of "SGI designated as SGI-M" who has determined that the document contains SGI designated as SGI-M, the date the determination was made, and an indication that unauthorized disclosure will be subject to civil and criminal sanctions. Transmittal letters or memoranda to or from the NRC that do not in themselves contain SGI designated as SGI-M must be marked to indicate that attachments or enclosures contain SGI designated as SGI-M but that the transmittal document does not. Transmittal documents forwarding SGI designated as SGI-M must alert the recipient that protected information is enclosed. Certification that a document or other matter contains SGI designated as SGI-M must include the name and title of the certifying official and the date designated. Transmittal documents to and from the NRC require portion marking showing which portions of the material contain SGI designated as SGI-M and which do not. The marking of documents containing or transmitting SGI designated as SGI-M must, at a minimum, include the words "Safeguards Information—Modified Handling."

Subsection 73.23(f) requires that documents or other matter containing SGI designated as SGI-M transmitted outside an authorized place of use or storage be packaged in two sealed envelopes or wrappers. The inner envelope or wrapper must contain the name and address of the intended recipient and be marked on both sides, top and bottom, with the words "Safeguards Information—Modified Handling." The outer envelope or wrapper must be opaque and addressed to the intended recipient; it must include the address of the sender and may not bear any markings or indication that the document contains SGI designated as SGI-M.

Subsection 73.24(b)(1) states that when making shipments of SNM in which individual shipments are less than a formula quantity, but the total quantity simultaneously in transit could equal or exceed a formula quantity, licensees must log the arrival of each shipment at its final destination. This record is necessary to verify shipment arrival and ensure that the total quantity of SNM in two or more shipments in transit at the same time does not equal or exceed a formula quantity.

Subsection 73.25(b) lists procedures required for the physical protection system and plan described in 10 CFR 73.20, "General performance objective and requirements." The information collection associated with these requirements appears in 10 CFR 73.20.

Subsection 73.25(c) lists procedures required for the physical protection system and plan described in 10 CFR 73.20. The information collection associated with these requirements appears in 10 CFR 73.20.

Subsection 73.25(d) lists procedures required for the physical protection system and plan described in 10 CFR 73.20. The information collection associated with these requirements appears in 10 CFR 73.20.

Subsection 73.26(b)(3) requires that, before each SNM shipment, licensees inform the NRC of the shipper, consignee, carriers, transfer points, modes of shipment, and security arrangements for the shipment. This information permits the NRC to verify that adequate measures will be taken to protect the material in transit.

Subsection 73.26(c) describes the records retention schedule for records associated with 10 CFR 73.25, "Performance capabilities for physical protection of strategic special nuclear material in transit"; 10 CFR 73.26, "Transportation physical protection systems, subsystems, components, and procedures"; and 10 CFR 73.27, "Notification requirements." This requirement is not an information collection but adds detail on information collections listed elsewhere in 10 CFR Part 73. Any burden associated with records retention is recorded under the information collection containing the recordkeeping requirement.

Subsection 73.26(d)(3) requires that licensees maintain a written management system for the development, revision, implementation, and enforcement of transportation physical protection procedures. The information collection associated with this requirement appears in 10 CFR 73.20(c).

Subsection 73.26(d)(4) requires that licensees document the qualification and requalification of members of the security organization. The licensee must retain the record of each individual's initial qualification for the term of employment and the record of each requalification for 5 years. NRC inspectors review this information to verify that security organization members are properly qualified in accordance with the site T&QP and implementing procedures.

Subsection 73.26(e)(1) refers to the written contingency plan required by 10 CFR 73.20. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.26(e)(2) requires that, upon detection of the abnormal presence or activity of persons or vehicles attempting to penetrate a moving convoy or persons attempting to gain access to a parked cargo vehicle, or upon evidence or indication of penetration of the cargo vehicle, armed escorts or other personnel inform LLEAs of the threat and request assistance.

Subsection 73.26(f)(2) requires the following security procedures for SNM transfers:

(1) The commander of the armed personnel protecting the shipment shall call a remote location at least every 30 minutes to report the status of the shipment.

(2) If they do not receive the calls, the remote location personnel shall request assistance from LLEAs, notify the shipment movement control center, and initiate the appropriate contingency plans.

(3) Escorts shall notify the licensee of the latest status of the shipment immediately after its departure.

Calling the remote location every 30 minutes is among the security staff's normal duties and is not reported as part of the burden.

Subsection 73.26(g)(1) requires the use of a numbered picture badge identification procedure to identify all individuals who will have custody of a shipment of SNM. Because all security officers assigned to duties involving shipments of nuclear material are required to wear numbered

picture badges as a normal part of their duties, this is not reported as part of the burden; thus, the information collection is for the procedure only.

Subsection 73.26(h)(5) lists procedures required for the physical protection system and plan described in 10 CFR 73.20. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.26(h)(6) requires licensees to document the results of annual audits of the transportation security program, along with recommendations for improvements, and to retain the documentation as a record for 3 years. NRC inspectors review these records to verify that the effectiveness of the physical security system is evaluated by licensee personnel independent of security management and supervision.

Subsection 73.26(i)(1) requires that licensees prepare a detailed route plan for SNM shipments by road that shows the routes to be taken, refueling and rest stops, and call-in times to the movement control center. This document is used to verify that the shipment is made on primary highways with minimum use of secondary roads, and that adequate measures for support and communications are available to protect the shipment.

Subsection 73.26(i)(5) requires the establishment of procedures in support of the physical protection system. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.26(i)(6) requires that SNM shipment or escort personnel make calls to the movement control center at least every half hour to convey the status and position of the shipment. If no call is received at a designated call-in time, the licensee must immediately notify law enforcement authorities and the NRC and initiate appropriate contingency plans. This notification is necessary so that the NRC can ensure timely response or investigation. Calling the movement control center every 30 minutes is among the security staff's normal duties and is not reported as part of the burden.

Subsection 73.26(j)(6) requires the establishment of procedures for shipment by air in support of the physical protection system. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.26(k)(2) requires the establishment of procedures for shipment by rail in support of the physical protection system. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.26(k)(4) requires that, for SNM shipments by rail, if no call is received from the shipment or escort personnel at a designated call-in time, the licensee must immediately notify law enforcement authorities and the NRC and initiate appropriate contingency plans. This notification is necessary so that the NRC can ensure timely response or investigation. The information collection associated with this requirement is captured under 10 CFR 73.26(i)(6), as the requirement is the same; only the transportation type differs.

Subsection 73.27(a)(1) requires that a licensee delivering formula quantities of strategic SNM (SSNM) to a carrier for transport immediately notify the consignee, by telephone, telegraph, or teletype, of the time of departure of the shipment, the method of transportation (including names of carriers), and the estimated time of arrival at the destination. This information is needed to

ensure that the consignee is aware that the shipment is en route, so that the consignee can carry out the safeguards transportation protection plan.

Subsection 73.27(a)(2) requires that, in the case of a shipment free on board at the point where it is delivered to a carrier for transport, the licensee shipper obtain written certification from the consignee who is to take delivery at the free point that the required physical protection arrangements have been made. This information is needed to ensure that the safeguards transportation protection plan will be carried out.

Subsection 73.27(a)(3) requires that a shipper arrange to receive immediate notification from the consignee when a shipment arrives at its destination or is lost or unaccounted for after the estimated time of arrival at its destination. This information is required so that the licensee can promptly notify the NRC of any missing material and initiate a trace investigation.

Subsection 73.27(b) requires a licensee receiving a shipment of formula quantities of SSNM to immediately notify the shipper and the NRC of the shipment's arrival at its destination, or of its failure to arrive at its destination at the estimated time. In the latter event, the shipper must also notify the NRC of the actions being taken to trace the shipment. This information is needed to maintain accountability for SSNM in transit, so that trace and recovery actions may be undertaken if necessary.

Subsection 73.27(c) states that if an SNM shipment is lost or unaccounted for, the licensee that made the physical protection arrangements must conduct a trace investigation and file a report with the NRC as specified in 10 CFR 73.1200, "Notification of physical security events." This information permits the NRC to determine whether all appropriate measures have been taken to trace and recover the material. The information collection associated with this requirement appears in 10 CFR 73.1200.

Subsection 73.37(a) requires licensees to notify the appropriate response forces of any spent fuel shipment sabotage attempts as part of the physical protection system and plan described in 10 CFR 73.20. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.37(b)(1)(ii) requires licensees to preplan and coordinate SNF shipments. The information collection associated with this requirement appears in 10 CFR 73.72, "Requirement for advance notice of shipment of formula quantities of strategic special nuclear material, special nuclear material of moderate strategic significance, or irradiated reactor fuel."

Subsection 73.37(b)(1)(iv) requires licensees to preplan and coordinate SNF shipments through, or across the boundary of, any State with the Governor of that State, or with the Governor's designee.

Subsection 73.37(b)(1)(vi) requires licensees to preplan and coordinate with the NRC to obtain advance approval of the routes used for road and rail shipments of SNF, and of any U.S. ports where vessels carrying SNF shipments are scheduled to stop.

Subsection 73.37(b)(2) requires licensees to notify the NRC in advance of each shipment of SNF. The notification requirements and the information collection associated with this requirement appear in 10 CFR 73.72.

Subsections 73.37(b)(2)(i)–(iii) require that before shipping SNF within or through a State, licensees notify that State. In addition, for each participating Tribe referenced in 10 CFR 71.97(c)(3), licensees must notify the Tribal official or Tribal official's designee before transporting SNF within or across that Tribal reservation. Licensees must also notify States before delivery for transport of licensed material outside the confines of the licensee's facility or other place of use or storage.

Subsection 73.37(b)(2)(iv) requires licensees to notify by telephone a responsible individual in the office of the Governor or in the office of the Governor's designee, and in the office of the Tribal official or in the office of the Tribal official's designee, of any schedule change that differs by more than 6 hours from the schedule information previously furnished under 10 CFR 73.37(b)(2)(iii). The licensee shall inform that individual of the number of hours of advance or delay relative to the written schedule information previously furnished.

Subsection 73.37(b)(2)(v) requires licensees that cancel a shipment for which advance notification has been sent to send a cancellation notice to the Governor or Governor's designee of each State previously notified, to each Tribal official or Tribal official's designee previously notified, and to the Director of the Division of Security Policy at the NRC's Office of Nuclear Security and Incident Response. The licensee shall state in the notice that it is a cancellation and identify the advance notification being canceled.

Subsection 73.37(b)(2)(vi) requires licensees to retain a copy of the preplanning and coordination activities, advance notification, and any revision or cancellation notice as a record for 3 years.

Subsection 73.37(b)(3)(iv) requires movement control center personnel and escorts to maintain a written log for each SNF shipment, which describes the shipment and significant events that occur during the shipment. The log must be available for review by authorized NRC personnel for a period of at least 3 years following completion of the shipment.

Subsection 73.37(b)(3)(v) requires licensees to develop, maintain, revise, and implement written transportation physical protection procedures.

Subsection 73.37(b)(3)(vi) requires licensees to retain the transportation physical protection procedures as a record for 3 years after the close of the period for which the licensee possesses the SNF.

Subsection 73.37(b)(3)(vii)(B) requires, as a part of the transportation physical protection program, that shipment escorts advise the movement control center at random intervals, not to exceed 2 hours of the status of road and rail shipments, and of sea shipments while shipment vessels are docked at U.S. ports.

Subsection 73.37(b)(3)(vii)(C) requires at least one armed escort to remain alert at all times, maintain constant visual surveillance of the shipment, and periodically report to the movement control center at preset regular intervals during periods when the shipment vehicle is stopped, or the shipment vessel is docked.

Subsection 73.37(b)(4)(iii) requires licensees to retain the contingency and response procedures as a record for 3 years after the close of the period for which the licensee possesses the SNF under each license for which the plan is used. Licensees must retain superseded material for 3 years after each change.

Subsection 73.37(f) requires each licensee that makes arrangements for the shipment of SNF to immediately conduct an investigation, in coordination with the receiving licensee, of any shipment that is lost or unaccounted for after the designated no-later-than arrival time in the advance notification.

Subsection 73.37(g)(iii) requires State officials, State employees, Tribal officials, Tribal employees, and other individuals who receive schedule information to protect the information from unauthorized disclosure.

Subsection 73.38(a)(2) requires licensees to establish, implement, and maintain an access authorization program.

Subsection 73.38(c)(2)(v) specifies a 3-year recordkeeping requirement for documentation pertaining to access authorization relative to SNF in transit for any individual who has an active Federal security clearance.

Subsection 73.38(d) requires licensees to conduct a background investigation before allowing an individual to act as an armed escort or to have unescorted access to SNF in transit.

Subsection 73.38(d)(1) requires licensees not to initiate any element of a background investigation without the informed and signed consent of the subject individual.

Subsection 73.38(d)(2) states that any individual who is required to have a background investigation under a licensee's access authorization program shall disclose the personal history information that is necessary to determine the individual's trustworthiness and reliability.

Subsection 73.38(d)(3) requires licensees to conduct fingerprinting, an FBI investigation, and criminal history records check in accordance with 10 CFR 73.57, "Requirements for criminal history records checks of individuals granted unescorted access to a nuclear power facility, a non-power reactor, or access to Safeguards Information." The fingerprint card (Form FD-258) is indicated as an acceptable method for submitting fingerprints. Form FD-258, covered under OMB Clearance 1110-0046, states the following as the authority for the information collection:

> **Authority:** The FBI's acquisition, preservation, and exchange of fingerprints and associated information is generally authorized under 28 U.S.C. 534. Depending on the nature of your application, supplemental authorities include Federal statutes, State statutes pursuant to Pub.L. 92-544, Presidential Executive Orders, and federal regulations. Providing your fingerprints and associated information is voluntary; however, failure to do so may affect completion or approval of your application.

Licensees will transmit fingerprint cards to the NRC for submission to the FBI.

Subsection 73.38(d)(5)(iv)(A) states that if a previous employer, educational institution, or any other entity with which an individual undergoing an employment history evaluation claims to have been engaged fails to provide information or indicates an inability or unwillingness to provide information, the licensee shall document this refusal or unwillingness. The licensee shall obtain a confirmation of employment, educational enrollment and attendance, or other form of engagement claimed by the individual from at least one alternate source that has not been previously used.

Subsection 73.38(d)(5)(vi) requires licensees to document any telephone calls made to obtain information on employment history.

Subsection 73.38(f)(5) requires licensees to retain all fingerprint and criminal history records received from the FBI on an individual (including data indicating no record), or copies if the files have been transferred, for 5 years from the date the individual no longer requires unescorted access or access authorization relative to SNF in transit.

Subsection 73.38(i) requires any individual who has applied for or is maintaining an access authorization to report to the reviewing official, his or her supervisor, or other management personnel designated in licensee procedures any legal action(s) taken by a law enforcement authority or court of law to which the individual has been subject that could result in incarceration or a court order that requires a court appearance.

Subsection 73.38(j) requires licensees to develop, implement, and maintain written procedures for conducting background investigations for persons who are applying for unescorted access authorization for SNF in transit; for updating background investigations for persons who are applying for reinstatement of unescorted access or access authorization; for ensuring that persons who have been denied unescorted access or access authorization are not allowed access to or information relative to SNF in transit; and for notifying individuals who are denied unescorted access or access authorization for SNF in transit.

Subsection 73.38(l) requires licensees to maintain records of background investigations of an individual employee for 5 years from the date the individual no longer requires access to SNF. Licensees must also retain a copy of the access authorization program procedures as a record for 5 years after the procedures are no longer needed. In addition, licensees must retain the list of persons approved for or denied unescorted access for 5 years after the list is superseded or replaced.

Section 73.40, “Physical protection: General requirements at fixed sites,” requires that licensees provide physical protection at a fixed site, or contiguous sites where licensed activities are conducted, against radiological sabotage, or against theft of SNM, or against both, in accordance with the applicable sections 10 CFR Part 73 for each specific class of facility or material license. If applicable, licensees are required to establish and maintain physical security in accordance with security plans approved by the NRC. The information collection associated with this requirement appears in 10 CFR 73.20.

Section 73.45, “Performance capabilities for fixed site physical protection systems,” requires that licensees' fixed site physical protection system (required by 10 CFR 73.20) contain certain provisions, procedures, and plans. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.46(b)(1) requires that licensees using a contract guard force for site security have a written agreement with the contractor that contains the following provisions:

- The licensee is responsible to the NRC for maintaining safeguards in accordance with NRC regulations and the licensee’s security plan.

- The NRC may inspect, copy, and remove copies of required reports and documents.

- The licensee must demonstrate the ability of the security force, including contractor personnel, to perform assigned duties.

These requirements are necessary to ensure that the licensee informs the security force contractor of its responsibilities.

Subsection 73.46(b)(3) requires that licensees have a management system that includes written security procedures that document the structure of the security organization and detail the duties of the Tactical Response Team, guards, watchmen, and other individuals responsible for security. The system must also make provision for written approval of such procedures and any revisions thereto by the individual with overall responsibility for the security function. This requirement is necessary to ensure that a management system is in place, that responsibilities and duties are clearly defined, and that the security organization is adequate to provide protection in accordance with the security plan.

Subsection 73.46(b)(4) requires that licensees may not permit an individual to act as a Tactical Response Team member, armed response person, guard, or other member of the security organization unless the individual has been trained, equipped, and qualified to perform each assigned security duty in accordance with 10 CFR Part 73, Appendix B, “General Criteria for Security Personnel.” In addition, Tactical Response Team members, armed response personnel, and guards shall be trained, equipped, and qualified to use their assigned weapons in accordance with 10 CFR 73.46(b)(6) and (b)(7). Tactical Response Team members, armed response personnel, and guards shall also be trained and qualified in accordance with either 10 CFR 73.46(b)(10) and (b)(11) or (b)(12). Upon the request of an authorized representative of the Commission, a licensee shall demonstrate the ability of the physical security personnel, whether licensee or contractor employees, to carry out their assigned duties and responsibilities. Each Tactical Response Team member, armed response person, and guard, whether a licensee or contractor employee, shall requalify in accordance with 10 CFR Part 73, Appendix B. Tactical Response Team members, armed response personnel, and guards shall also requalify in accordance with 10 CFR 73.46(b)(7) at least once every 12 months. The licensee shall document the results of the qualification and requalification. The licensee shall retain the documentation of each qualification and requalification as a record for 3 years after each qualification and requalification. The burden for this information collection has been listed together with that for 10 CFR 73.46(b)(7)–(8) and 10 CFR 73.46(b)(11)(i).

Subsection 73.46(b)(7) requires that licensees document the qualification and requalification of Tactical Response Team members, armed response personnel, and guards in day and night firing. This documentation verifies that qualification and requalification have occurred and provides a record of individual performance. The burden for this information collection has been listed together with that for 10 CFR 73.46(b)(4), (b)(8), and (b)(11)(i).

Subsection 73.46(b)(8) requires that licensees document the training of Tactical Response Team members in response tactics. This documentation verifies that training has occurred and provides a record of individual performance. The burden for this information collection has been listed together with that for 10 CFR 73.46(b)(4), (b)(7), and (b)(11)(i).

Subsection 73.46(b)(9) requires that licensees notify the NRC at least 60 days in advance of each scheduled training exercise for the security force that the NRC will observe. The licensee must also document the results of all exercises. The notification requirement allows the NRC to arrange for inspectors to observe the exercise. The documentation verifies that the exercise took place and provides a record of security force performance.

Subsection 73.46(b)(10)(iii) requires that licensees obtain a written certification by an examining physician that there are no contraindications to any individual's participation in the physical fitness training program.

Subsection 73.46(b)(11)(i) requires that licensees retain a record of each security force member's attempt to qualify or requalify by meeting or exceeding the applicable qualification criteria. This is a repetition of the requirement in 10 CFR 73.46(b)(4) and is not in itself an information collection.

Subsection 73.46(b)(11)(iii) states that before participating in physical performance testing, each security force member must obtain written certification from a licensed physician that there are no medical contraindications to the individual's participation in such testing.

Subsections 73.46(b)(12) and (b)(12)(i), taken together, require licensees to submit site-specific, content-based physical fitness performance tests for NRC approval. This information is incorporated into the licensee's physical protection plan. The NRC may use the information to inspect the physical performance testing program to ensure that it is adequate to protect public health and safety. The burden for this information collection is incorporated into that for 10 CFR 73.46(b)(4).

Subsection 73.46(b)(12)(ii) states that, before the first administration of the site-specific, content-based physical fitness test, and annually thereafter, all security force members shall undergo medical examination and obtain written certification from a licensed physician that there are no medical contraindications to their participation in the tests.

Subsection 73.46(d)(3) lists procedures required for the physical protection system and plan described in 10 CFR 73.20. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.46(d)(10) requires licensees to maintain records of the findings of teams conducting drum scanning and tamper sealing of containers of contaminated waste. These records verify that the scanning took place and document the scan readings for later use in review of the waste shipments if needed.

Subsection 73.46(d)(11) requires that licensee teams verify and certify the contents of containers of SSNM being prepared for shipment offsite. These records verify the weight, assay, and tamper-seal integrity of the containers.

Subsection 73.46(d)(13) requires that individuals provided escorted access to protected areas register in a log their name, date, time, purpose of visit, employment affiliation, citizenship, and name of the individual to be visited. The log serves as a record of visitors permitted access. It may be inspected to verify that access control requirements are being followed, and it facilitates any subsequent investigation of irregular events.

Subsection 73.46(g)(5) requires the establishment of procedures in support of the physical protection system and plan described in 10 CFR 73.20. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.46(g)(6) requires licensee staff to document and report to management the results of an annual independent review and audit of the security program. NRC inspectors

review these records to ensure that licensee personnel independent of security management and supervision evaluate the effectiveness of the security program and report the results of the review to higher management. These records must be retained for 3 years.

Subsection 73.46(h)(1) restates and provides details on the requirement in 10 CFR 73.20 for an SCP. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.46(h)(2) requires that licensees establish and document response arrangements with local law enforcement authorities. Such arrangements are used to verify law enforcement response capabilities and to ensure that both parties clearly understand what is expected and what assistance law enforcement authorities will provide in case of an emergency.

Subsection 73.46(h)(3) requires that the physical protection plans submitted to the NRC as required by 10 CFR 73.20 include the basis for determining the size and availability of an additional force of guards or armed response personnel. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.46(h)(4)(iii)(B) requires that licensees inform LLEAs of any detected threat and request assistance. This notification is necessary to ensure that licensees obtain law enforcement assistance to neutralize any threat to vital areas or material access areas.

Subsection 73.50(a)(3) requires certain licensees that possess, use, or store formula quantities of SSNM to maintain written security procedures that document the structure of the security organization and detail the duties of guards, watchmen, and other individuals responsible for security.

Subsection 73.50(a)(4) requires that licensees document the qualification and requalification of guards, watchmen, and other members of the security organization. This documentation verifies that qualification and requalification have occurred and provides a record of individual performance.

Subsection 73.50(c)(5) specifies that licensees must require that individuals provided escorted access to protected areas register in a log their name, date, time, purpose of visit, employment affiliation, citizenship, name and badge number of the escort, and name of the individual to be visited. The log serves as a record of visitors permitted access. It may be inspected to verify that access control requirements are being followed, and it facilitates any subsequent investigation of irregular events.

Subsection 73.50(g)(1) requires that licensees maintain an NRC-approved SCP for dealing with threats, thefts, and radiological sabotage related to SSNM and nuclear facilities. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.50(g)(2) requires that licensees establish and document response arrangements (i.e., liaisons) with local law enforcement authorities. Such arrangements are used to verify law enforcement response capabilities and to ensure that both parties clearly understand what is expected and what assistance law enforcement will provide in case of an emergency.

Subsection 73.50(g)(3)(iii)(B) requires that licensees inform LLEAs of any detected threat and request assistance. This notification requirement is necessary to ensure that licensees obtain law enforcement assistance to neutralize any threat to vital areas or material access areas.

Subsection 73.50(h) lists requirements for the NRC-approved T&QP described in 10 CFR 73.20. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.51(d)(5) lists procedures required for the physical protection system and plan described in 10 CFR 73.20.

Subsection 73.51(d)(6) requires licensees to establish a documented liaison with local law enforcement or a designated response force as part of their security plan.

Subsection 73.51(d)(10) lists procedures required for the physical protection system and plan described in 10 CFR 73.20.

Subsection 73.51(d)(12) requires a review of licensee physical protection programs every 24 months by individuals independent of both physical protection program management and personnel who have direct responsibility for implementation of the physical protection program. The review must include an evaluation of the effectiveness of the physical protection system and a verification of the liaison established with the designated response force or LLEA.

Section 73.54, “Protection of digital computer and communication systems and networks” (in its introduction), gives the deadline for submittal of CSPs for NRC approval. This requirement captures the one-time burden associated with creating and submitting CSPs. This requirement is complete.

Subsection 73.54(b)(1) requires licensees to analyze digital computer and communications systems to identify assets that must be protected. This analysis is contained in the CSP required by 10 CFR 73.54(e), and the information collection associated with this requirement appears in that subsection.

Subsection 73.54(e) requires licensees to establish, implement, and maintain an NRC-approved CSP that implements the requirements of 10 CFR 73.54 and accounts for the site-specific conditions that affect implementation. The CSP must include measures for incident response and recovery for cyberattacks and must describe how the licensee will maintain the capability for timely detection and response to cyberattacks, mitigate the consequences of cyberattacks, correct exploited vulnerabilities, and restore systems, networks, and equipment affected by cyberattacks.

Subsection 73.54(f) requires licensees to develop and maintain written policies in support of the CSP required by 10 CFR 73.54(e). The information collection associated with this requirement appears in 10 CFR 73.54(e).

Subsection 73.55(b)(6) describes the requirement for a performance evaluation program (PEP). The information collection associated with this requirement appears in 10 CFR 73.55(c)(4), as the T&QP documents the PEP.

Subsection 73.55(b)(7) requires licensees to document their access authorization program in their PSP. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(b)(8) requires licensees to establish, maintain, and implement a CSP. The information collection associated with this requirement appears in 10 CFR 73.54(e).

Subsection 73.55(b)(9) requires licensees to document their insider mitigation program in their PSP. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete.

Subsection 73.55(b)(10) requires licensees to develop corrective action measures. The information collection associated with this requirement appears in 10 CFR 73.55(m).

Subsection 73.55(b)(11) requires that licensees coordinate plan and procedure implementation to preclude conflict. The information collection associated with this requirement appears in 10 CFR 73.58(d), which requires the communication of potential conflicts.

Subsection 73.55(c)(1) requires licensees to include certain descriptions in their security plans. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(c)(3) requires licensees to establish and maintain a PSP that includes the analyses and site-specific information identified in 10 CFR 73.55, “Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage.”

Subsection 73.55(c)(4) requires licensees to establish, implement, and maintain a T&QP.

Subsection 73.55(c)(5) requires licensees to establish, implement, and maintain an SCP.

Subsection 73.55(c)(6) repeats the requirement for licensees to establish, implement, and maintain a CSP. The information collection associated with this requirement appears in 10 CFR 73.54(e).

Subsection 73.55(c)(7) requires licensees to establish, implement, and maintain written security procedures that implement NRC requirements and security plans.

Subsection 73.55(e)(1) requires that licensees describe barriers, barrier systems, and their functions in their PSPs. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(e)(2) lists records retention requirements for barrier analyses and descriptions. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(e)(8)(iv) requires the security plan to describe portions of barriers comprising building walls or roofs. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(e)(10)(ii)(A) requires licensees to identify areas from which a waterborne vehicle must be restricted and to coordinate with local, State, and Federal agencies having jurisdiction over waterway approaches to ensure that waterway approach routes are controlled. This is a one-time requirement connected to 10 CFR 75.55(a), which requires revised documentation to support the revised requirements of this subsection. This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(f) requires licensees to document in site procedures the process used to develop and identify target sets. This documentation must cover the analyses and methodologies used to determine and group the target set equipment or elements, including

target set equipment or elements not contained within protected or vital areas. The information collection associated with this requirement appears in 10 CFR 73.55(c)(7).

Subsection 73.55(g)(5)(ii) requires licensees to develop certain procedures for emergency conditions. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete.

Subsection 73.55(g)(6)(i)(B) requires licensees to maintain a record (including name and affiliation) of all individuals to whom access control devices have been issued, and to inventory access control devices at least annually.

Subsection 73.55(g)(6)(ii)(C) requires licensees to maintain a record (including name and areas to which unescorted access is granted) of all individuals to whom photo identification badges or keycards have been issued.

Subsection 73.55(g)(6)(iii) requires licensees to issue passwords and combinations to access control personnel.

Subsection 73.55(g)(7)(i)(A) requires licensees to implement procedures for processing, escorting, and controlling visitors. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(g)(7)(i)(C) requires licensees to maintain a visitor control register recording all pertinent visitor information.

Subsection 73.55(g)(8)(v) requires licensees to describe visitor-to-escort ratios and implementing procedures for protected and vital areas in PSPs. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(h)(2)(ii) requires licensees to describe in implementing procedures the vehicle search process for owner-controlled areas. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(h)(3)(iv) requires licensees to describe in implementing procedures the vehicle search process for protected areas. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(h)(3)(v) requires licensees to describe items to be excepted from search in site procedures. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(i)(4)(ii)(H) requires licensees to maintain a record of all alarm annunciations, the cause of each alarm, and the disposition of each alarm.

Subsection 73.55(i)(6)(iii) requires licensees to describe how lighting requirements are met in their security plans. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(j)(6) requires that licensee implementing procedures account for areas where communication might be interrupted. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(k)(5) requires licensees to document in their security plans the necessary number of armed responders. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(k)(6) requires licensees to document in their security plans the number of armed security officers designated to strengthen onsite response capabilities. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(k)(7) requires licensees to have procedures to reconstitute the documented number of available armed response personnel required to implement the protective strategy. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(k)(8) requires licensees to establish, maintain, and implement a written protective strategy to be documented in procedures. The information collection associated with this requirement appears in 10 CFR 73.55(c)(7).

Subsection 73.55(k)(8)(iii) requires that licensees notify LLEA upon receipt of an alarm or other indication of a threat.

Subsection 73.55(k)(9) requires licensees to document and maintain current agreements with LLEA, including estimated response times and capabilities.

Subsection 73.55(l)(3) requires licensees to describe in their security plans the operational and administrative controls to be implemented for the receipt, inspection, movement, storage, and protection of unirradiated mixed-oxide (MOX) fuel assemblies, and to develop a material control and accountability program to document the inventory and location of the SSNM within the assemblies. The information collections associated with this requirement are contained in 10 CFR 73.55(c)(7).

Subsection 73.55(l)(7) requires that requests for use of MOX fuel assemblies containing greater than 20 weight percent plutonium dioxide (PuO_2) be reviewed and approved by the NRC before receipt of MOX fuel assemblies.

Subsection 73.55(m) requires licensees to create and maintain written reports on results and recommendations of onsite physical protection program reviews and audits, management's findings on program effectiveness, and any actions taken as a result of recommendations from prior reviews. It also requires licensees to enter findings from onsite physical protection program reviews, audits, and assessments into the site's corrective action program.

Subsection 73.55(n)(1) requires licensees to establish, maintain, and implement a maintenance, testing, and calibration program, described in the PSP and implementing procedures, to include the criteria for determining when problems, failures, deficiencies, and other findings are documented in the site's corrective action plan. The information collections associated with this requirement are contained in 10 CFR 73.55(c)(7).

Subsection 73.55(n)(7) requires licensees to specify in implementing procedures a program for testing or verifying the operability of devices or equipment located in hazardous areas. This program must define alternate measures to be taken to ensure the timely completion of testing or maintenance when the hazardous condition or other restrictions are no longer applicable. This is a one-time requirement connected to 10 CFR 75.55(a). This requirement is complete for current nuclear power reactor licensees.

Subsection 73.55(o) requires that licensees identify and describe in their security plans criteria and measures to compensate for degraded or inoperable equipment, systems, and components to meet the requirements of 10 CFR 73.55. The information collection associated with this requirement appears in 10 CFR 73.55(c)(3).

Subsection 73.55(p)(1) requires licensees to get approval, at a minimum, from a licensed senior operator before suspending security measures during an emergency. It also requires licensees to get approval from a licensed senior operator, with input from the senior security supervisor or manager, before suspending security measures because of severe weather. The information collection associated with this requirement appears in 10 CFR 73.55(p)(3).

Subsection 73.55(p)(3) requires licensees to document the suspension of security measures in accordance with 10 CFR 73.1200 and 10 CFR 73.1205, “Written follow-up reports of physical security events.”

Subsection 73.55(q)(2) requires that licensees maintain all records mandated to be kept by Commission regulations, orders, or license conditions until the Commission terminates the license for which the records were developed. Licensees shall maintain superseded portions of these records for at least 3 years after the record is superseded, unless otherwise specified by the Commission. There is no information collection for this requirement.

Subsection 73.55(q)(3) requires licensees to retain any written agreement with a contracted security force for the duration of the contract.

Subsection 73.55(q)(4) requires licensees to retain all audit reports, and to make them available for inspection, for 3 years. The information collection associated with this requirement appears in 10 CFR 73.55(m).

Subsection 73.55(r) describes the process by which licensees may submit requests for alternative measures in accordance with 10 CFR 50.4, “Written communications,” and 10 CFR 50.90, “Application for amendment of license, construction permit, or early site permit.” There is no information collection for this subsection.

Subsection 73.56(a)(4) allows licensees and applicants to accept, in part or whole, an access authorization program implemented by a contractor or vendor. To be acceptable, access authorization programs or program elements developed, implemented, or maintained by contractors or vendors must meet the requirements of 10 CFR 73.56, “Personnel access authorization requirements for nuclear power plants.”

Subsection 73.56(d) requires a documented background investigation for any individual granted unescorted access to the protected or vital area of a nuclear power plant. This subsection requires licensees, applicants, and contractors or vendors to obtain written consent from individuals who are applying for unescorted access authorization before initiating background investigations. It also requires licensees, applicants, and contractors or vendors to inform

individuals that they have the right to review information collected to ensure its accuracy; that withdrawal of consent will withdraw that individual's current application for access authorization; and that other licensees, applicants, and contractors or vendors will have access to information documenting the withdrawal. Licensees, applicants, and contractors or vendors must complete any background investigation elements that were in progress when an applicant withdrew his or her consent. They must record the individual's application for unescorted access authorization, his or her withdrawal of consent for the background investigation, the reason given for the withdrawal (if any), and any pertinent information collected from the background investigation elements that were completed. This subsection requires any individual who is applying for unescorted access authorization to disclose the personal history information that is required by the licensee's, applicant's, or contractor's or vendor's authorization program, as well as any other information that may be necessary for the reviewing official to make a determination of the individual's trustworthiness and reliability.

Subsection 73.56(e) requires psychological assessments of individuals applying for or having unescorted access. It requires that licensees, applicants, or contractors or vendors enable the licensed clinical psychologist or psychiatrist conducting an assessment to communicate with other medical personnel as needed, and that the psychologist or psychiatrist advise the reviewing official of any indications or information, including medical conditions, that could adversely impact the individual's fitness for duty or trustworthiness and reliability. In the case of an individual currently granted unescorted access or access authorization, if the psychologist or psychiatrist identifies or discovers any information that could adversely impact the individual's fitness for duty or trustworthiness and reliability, he or she must inform the reviewing official of the discovery within 24 hours and must provide the results of the evaluation and a recommendation to the reviewing official.

Subsection 73.56(f) requires each person subject to the behavior observation program to report any concerns arising from behavioral observation.

Subsection 73.56(g) requires any individual who has applied for or is maintaining unescorted access authorization to promptly report to the reviewing official any formal actions taken against him or her by a law enforcement authority or court of law, including arrests, indictments, the filing of charges, and convictions. Licensees must inform individuals of this obligation in writing before granting unescorted access or certifying unescorted access authorization.

Subsection 73.56(i) requires licensees, applicants, and contractors or vendors to complete a criminal history update, credit history reevaluation, and psychological reassessment of each individual with unescorted access within 5 years of the date on which these elements were last completed, or more frequently, depending on job assignment. Licensees, applicants, and contractors or vendors must administratively withdraw an individual's unescorted access authorization if that individual's criminal history update, credit history reevaluation, psychological reassessment, and supervisory review have not been completed.

Subsection 73.56(j) requires licensees to establish, implement, and maintain a list of individuals who are authorized to have unescorted access to specific nuclear power plant vital areas during nonemergency conditions. This list assists in limiting nonemergency access to vital areas. The list must be approved by a cognizant licensee or applicant manager or supervisor who is responsible for directing the work activities of the individual who is granted unescorted access to each vital area, and it must be updated and reapproved no less frequently than every 31 days.

Subsection 73.56(k) requires licensees, applicants, and contractors or vendors to conduct background checks on individuals who collect, process, or have access to the sensitive personal information used to make unescorted access determinations, increasing the scope of individuals who are subject to background checks.

Subsection 73.56(l) requires licensees to include review and notification procedures in their access authorization program. The information collection associated with this requirement appears in 10 CFR 73.55(c)(7).

Subsection 73.56(m) requires licensees, applicants, and contractors or vendors that collect personal information about individuals for compliance with 10 CFR 73.56 to establish and maintain a system of files and procedures to protect that personal information.

Subsection 73.56(m)(1) requires licensees and contractors or vendors to obtain signed consent from the subject individual that authorizes the disclosure of any personal information collected and maintained under 10 CFR 73.56 before disclosing the information. This does not apply to disclosures of such information to other licensees and applicants, or their authorized representatives, such as contractors or vendors, that are legitimately seeking that information for unescorted access or unescorted access authorization determinations under 10 CFR 73.56.

Subsection 73.56(m)(2) requires licensees, applicants, and contractors or vendors to provide copies of all records pertaining to a denial or unfavorable termination of unescorted access authorization to the subject individual or his or her designated representative upon written request.

Subsection 73.56(m)(4) requires the establishment of procedures for the secure storage and handling of personal information. The information collection associated with this requirement appears in 10 CFR 73.55(c)(7).

Subsection 73.56(n)(1) requires each licensee to ensure that its entire access authorization program is audited nominally every 24 months.

Subsection 73.56(n)(2) states that if a licensee or applicant relies upon a contractor's or vendor's program or program element to meet the requirements of 10 CFR 73.56, and if the contractor or vendor's personnel providing the program services either are offsite, or are on site but not under the direct daily supervision or observation of the licensee's or applicant's personnel, then the licensee or applicant must audit the contractor's or vendor's program or program element on a nominal 12-month frequency. This subsection also requires that any access authorization program services that a contractor or vendor receives from subcontractor personnel who are offsite or are not under the direct daily supervision or observation of the contractor's or vendor's personnel must be audited on a nominal 12-month frequency. The information collection associated with this requirement appears in 10 CFR 73.56(n)(1).

Subsection 73.56(n)(6) specifies how the audits required by 10 CFR 73.56(n)(1)–(2) must be documented. The information collection associated with this requirement appears in 10 CFR 73.56(n)(1).

Subsection 73.57(a) states that each applicant for a license to operate a nuclear power reactor, as well as each entity that has provided written notice to the NRC of intent to file an application for licensing, certification, permitting, or approval of a product subject to NRC regulation, shall submit fingerprint cards for each individual who will have access to SGI. Nuclear power plant

licensees shall fingerprint each individual who will have access to SGI or who will require unescorted access to the nuclear power facility.

Subsection 73.57(b)(1) requires that licensees fingerprint each individual who is permitted or seeking unescorted access to the nuclear power facility, unescorted access to the nonpower reactor facility (in accordance with 10 CFR 73.57(g)), or access to SGI.

Subsection 73.57(b)(3) requires each nuclear power reactor licensee or nonpower reactor licensee to notify fingerprinted individuals that their fingerprints will be used to secure a review of their criminal history records, and to inform them of proper procedures for revising the record or including explanation in the record.

Subsection 73.57(b)(6) requires that nuclear power reactor licensees and nonpower reactor licensees submit fingerprints to the Attorney General of the United States through the NRC. The information collection associated with this requirement appears in 10 CFR 73.57(b)(1).

Subsection 73.57(d) provides instructions for submitting fingerprint cards. The information collection associated with this requirement appears in 10 CFR 73.57(a).

Subsection 73.57(d)(1) requires nuclear power reactor licensees and nonpower reactor licensees to obtain, complete, and send to the NRC one fingerprint record (Form FD-258) for each individual requiring unescorted access. The subsection also requires that licensees establish procedures to minimize the rejection rate of fingerprint cards. The information collection associated with this requirement appears in 10 CFR 73.57(b)(1).

Subsection 73.57(d)(2) requires the NRC to review applications for completeness and return to licensees those applications that are incomplete or contain evident errors. The information collection associated with this requirement appears in 10 CFR 73.57(b)(1).

Subsection 73.57(e) states that, before making a final adverse determination, licensees must make available to the individual the contents of records obtained from the FBI for the purpose of ensuring correct and complete information, and must retain a record of receipt by the individual of this notification for 1 year from the date of the notification. If, after reviewing the record, an individual believes that the information is incorrect or incomplete and wishes to make changes, corrections, or updates, or to explain any matter in the record, that individual may initiate challenge procedures. Additionally, an individual participating in an NRC adjudication and seeking to obtain SGI for use in that adjudication may appeal a final adverse determination by the NRC.

Subsection 73.57(f)(1) requires each nuclear power reactor licensee or nonpower reactor licensee to establish and maintain a system of files and procedures to protect criminal history records and personal information from unauthorized disclosure.

Subsection 73.57(f)(3) allows each nuclear power reactor licensee or nonpower reactor licensee to transfer records on an individual to another licensee upon the individual's written request and upon verification of personal information by the gaining licensee.

Subsection 73.57(f)(4) requires nuclear power reactor licensees and nonpower reactor licensees to make records available to the NRC so that the NRC can determine compliance with regulations and laws.

Subsection 73.57(f)(5) requires nuclear power reactor licensees and nonpower reactor licensees to retain all fingerprint and criminal history records, or copies of the records, on an individual for 1 year after termination or denial of unescorted access to the nuclear power reactor facility, nonpower reactor facility, or SGI.

Subsection 73.57(g)(1) requires a review of an individual's criminal history record by an NRC-approved reviewing official before the individual receives unescorted access to a nonpower reactor facility. The information collection associated with this requirement appears in 10 CFR 73.57(b)(1).

Subsections 73.57(g)(2)(i) and 73.57(g)(2)(ii) require nonpower reactor licensees to obtain fingerprints for a criminal history records check for each individual seeking or permitted unescorted access to vital areas or SNM in the nonpower reactor facility. The information collection associated with this requirement appears in 10 CFR 73.57(b)(1).

Subsection 73.58(b) requires licensees to assess and manage the potential for adverse effects on safety and security before implementing changes to plant configurations, procedures, facility conditions, or security. This implies that licensees need to maintain safety/security interface written procedures.

Subsection 73.58(d) requires licensees to communicate identified adverse interactions to the appropriate licensee personnel and to take compensatory or mitigative actions, or both, to maintain safety and security.

Subsection 73.60(e) requires licensees to establish, maintain, and follow an NRC-approved SCP. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.67(a) requires the physical protection system to respond to indications of unauthorized removal of SNM and notify the appropriate response forces of its removal in order to facilitate its recovery.

Subsection 73.67(c) requires licensees to submit a security plan or amended security plan describing how they will comply with the physical protection requirements in 10 CFR 73.67. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.67(d)(11) requires the establishment of response procedures in support of the physical protection program. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.67(e)(1) requires that licensees shipping SNM of moderate strategic significance provide advance notification to the receiver of any planned shipments, specifying the mode of transport, estimated time of arrival, location of the nuclear material transfer point, name of the carrier, and transport identification. Before a shipment commences, the licensee must also receive confirmation from the receiver that the receiver will be ready to accept the shipment at the planned time and location and acknowledges the specified mode of transport. The required notification and confirmation alert the intended receiver of an impending shipment and ensure that the shipper has preplanned the transportation of the material, and that the receiver is ready to accept the material. It also helps ensure positive control of the material during transport and facilitates tracing of any missing material.

Subsection 73.67(e)(3) states that licensees that arrange for the in transit physical protection of SNM of moderate strategic significance, or that take delivery of this material free on board the point at which it is delivered to a carrier for transport, must establish and maintain written response procedures for dealing with thefts or threats of thefts of the material. Licensees must retain a copy of the procedures as a record. Licensees use this information to provide instructions to employees for dealing with contingencies. The NRC inspects this information to verify that the licensee has developed adequate procedures for dealing with thefts or threats of thefts. Licensees must make arrangements to be notified immediately of the arrival of the shipment at its destination, or of any such shipment that is lost or unaccounted for after the estimated time of arrival at its destination. Licensees use this information to determine that a shipment has either arrived safely or is missing. The notification gives licensees a basis for initiating a trace investigation, which is required if a shipment is delayed or lost. Licensees must notify the NRC Headquarters Operations Center within 1 hour after the discovery of the loss of a shipment and within 1 hour after recovery of or accounting for a lost shipment, in accordance with 10 CFR 73.1200 and 10 CFR 73.1205. This notification permits the NRC to initiate or terminate a trace investigation if necessary.

Subsections 73.67(e)(4), 73.67(e)(5), and 73.67(e)(6)(i) list the retention requirements for records required by 10 CFR 73.67(c) and 10 CFR 73.67(e). The burden for records retention is captured under each specific requirement.

Subsection 73.67(e)(6)(ii) requires that licensees that import SNM of moderate strategic significance notify the exporter that delivered the material to a carrier for transport of the arrival of such material. The exporting licensee uses this information to determine that a shipment either has arrived safely or is missing. Such notification gives licensees a basis for initiating a trace investigation if a shipment is delayed or lost.

Subsection 73.67(e)(7)(i) requires a shipper to provide additional information on a planned shipment upon request by the NRC. The NRC uses this information, if requested, to determine whether it is necessary to issue orders to licensees if it appears to the NRC that two or more shipments of SNM of moderate strategic significance, whose total amount is equal to or greater than a formula quantity of SSNM, may be en route at the same time.

Subsection 73.67(e)(7)(ii) requires that the receiver, or the shipper if the receiver is not a licensee, notify the NRC by telephone within 24 hours after the arrival of a shipment at its final destination, or after the shipment has left the United States as an export. This notification permits the NRC to confirm the integrity of the shipment at the time of receipt or exit from the United States.

Subsection 73.67(f)(4) requires the establishment of response procedures in support of the physical protection program. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsections 73.67(g)(1)–(2) require that licensees shipping SNM of low strategic significance provide advance notification to the receiver of any planned shipments, specifying the mode of transport, estimated time of arrival, location of the nuclear material transfer point, name of the carrier, and transport identification. Before commencement of the shipment, the licensee must also receive confirmation from the receiver that the receiver will be ready to accept the shipment at the planned time and location and acknowledge the specified mode of transport. The receiving licensee must notify the shipper of the receipt of the material in accordance with 10 CFR 74.15, “Nuclear material transaction reports.” The required notifications and

confirmation ensure that the shipper has preplanned the transportation of the material and that the receiver is ready to accept the material. They also help ensure positive control of the material during transport and the traceability of any missing material.

Subsection 73.67(g)(3)(i) requires the establishment of response procedures in support of the physical protection program. The information collection associated with this requirement appears in 10 CFR 73.20.

Subsection 73.67(g)(3)(ii) requires that a shipper of SNM of low strategic significance make arrangements to be notified immediately of the arrival of the shipment at its destination, or of any such shipment that is lost or unaccounted for after the estimated time of arrival at its destination. The licensee uses this information to determine that a shipment either has arrived safely or is missing. The notification gives the licensee a basis for initiating a trace investigation if a shipment is delayed or lost.

Subsection 73.67(g)(3)(iii) requires that licensees notify the NRC Headquarters Operations Center within 1 hour after the discovery of the loss of a shipment and within 1 hour after recovery of or accounting for a lost shipment, in accordance with 10 CFR 73.1200 and 10 CFR 73.1205. This notification permits the NRC to initiate or terminate a trace investigation if necessary.

Subsection 73.67(g)(4) lists the records retention requirements for materials export records. The burden associated with records retention is reported under each specific requirement.

Subsection 73.67(g)(5)(i) lists the records retention requirements for materials import records. The burden associated with records retention is reported under each specific requirement.

Subsection 73.67(g)(5)(ii) requires that licensees notify the person who delivered material to a carrier for transport of the arrival of the material. The licensee uses this information to determine that a shipment either has arrived safely or is missing. The notification gives the licensee a basis for initiating a trace investigation if a shipment is delayed or lost.

Subsection 73.70(a) requires that licensees keep a record of the names and addresses of all authorized individuals. This information serves to identify those responsible for surveillance of SNM, and to limit the number of individuals with such responsibility. It identifies persons who had access if an investigation proves necessary and provides verification, during inspections, that designation and access control procedures are being conducted properly.

Subsection 73.70(b) requires that licensees keep a record of the names, addresses, and badge numbers of all individuals authorized to have access to vital equipment or SNM, and the vital areas and material access areas to which authorization is granted. This record provides formal access authorization control. It provides verification that access control requirements are being met and serves to limit the number of individuals with such access.

Subsection 73.70(c) requires that licensees keep a register of visitors, vendors, and other individuals not employed by the licensee. The information collections associated with this requirement appear in 10 CFR 73.46, “Fixed site physical protection systems, subsystems, components, and procedures”; 10 CFR 73.50, “Requirements for physical protection of licensed activities,” and 10 CFR 73.55.

Subsection 73.70(d) requires that licensees keep a log of all individuals granted access to a vital area, except those individuals entering or exiting the reactor control room. This record shows who had access to vital areas. It is inspected to assess licensee performance in minimizing unnecessary access. It can also provide data to aid an investigation of an irregular event.

Subsection 73.70(e) requires that licensees keep documentation of all routine security tours and inspections, and of all tests, inspections, and maintenance performed on physical barriers, intrusion alarms, communications equipment, and other security-related equipment. This documentation provides a record of security tours, tests, and maintenance and allows verification during inspections of the frequency of tests and prompt maintenance after failures. It also provides an equipment maintenance history that is useful in evaluating operating performance.

Subsection 73.70(f) requires that licensees keep a record at each onsite alarm annunciation location of each alarm, false alarm, alarm check, and tamper indication. Licensees must also record details of response by facility guards and watchmen to each alarm, intrusion, or other security incident. This includes all types of signals sent to the alarm system's main computer, including authorized door openings and closings. The record provides verification that alarms are operating properly, that licensees respond properly, and that operational checks are conducted in accordance with the regulations. It also facilitates evaluation of the long-term reliability of the alarm system.

Subsection 73.70(g) requires that licensees keep a record of shipments of SNM subject to the requirements of 10 CFR Part 73, including names of carriers, major roads to be used, flight numbers for air shipments, dates and expected times of departure and arrival of shipments, verification of communication equipment on board the transfer vehicle, names of individuals who are to communicate with the transport vehicle, container seal descriptions and identification, and other details to confirm compliance with protection requirements. Licensees must also record information obtained during the course of a shipment, such as reports of all communications, changes of shipping plan (including monitor changes), trace investigations, and other information. These records serve as a part of the material control system by documenting bulk inventory change at any given plant. They also provide an audit trail and experience base for evaluating the transportation process at a later time.

Subsection 73.70(h) requires that licensees maintain written procedures for controlling access to protected areas and to keys for locks used to protect SNM. These procedures aid in access control and lock and key control. They also serve as a record that may be inspected to assess the licensee's performance in minimizing access and providing adequate control of key and lock operations.

Section 73.72 states that licensees shipping a formula quantity of SSNM, SNM of moderate strategic significance, or irradiated reactor fuel that must be protected pursuant to 10 CFR 73.37, "Requirements for physical protection of irradiated reactor fuel in transit," must notify the NRC in writing at least 10 days before shipment, providing shipment details and itinerary, and must notify the NRC by telephone of the transmittal of the advance notice and of any changes to the shipment itinerary. Such notification allows the NRC to review shipment details and schedule appropriate monitoring of the shipment. It also allows verification of shipment details during inspections.

Section 73.73, “Requirement for advance notice and protection of export shipments of special nuclear material of low strategic significance,” requires licensees exporting SNM of low strategic significance to notify the NRC in writing at least 10 days before shipment, providing shipment details and itinerary. Licensees may notify the NRC by telephone of any changes to the shipment details or itinerary. Such notification allows the NRC to review shipment details and schedule appropriate monitoring of the shipment. It also allows verification of shipment details during inspections.

Section 73.74, “Requirement for advance notice and protection of import shipments of nuclear material from countries that are not party to the Convention on the Physical Protection of Nuclear Material,” requires licensees importing SNM of low strategic significance from a country not a party to the Convention on the Physical Protection of Nuclear Material to notify the NRC in writing at least 10 days before shipment, providing shipment details and itinerary. Licensees may notify the NRC by telephone of any changes to the shipment details or itinerary. Such notification allows the NRC to review shipment details and schedule appropriate monitoring of the shipment. It also allows verification of shipment details during inspections.

Subsection 73.77(a)(1) requires licensees subject to the provisions of 10 CFR 73.54 to notify the NRC Headquarters Operations Center of the cybersecurity events identified at 10 CFR 73.77(a)(1) through the Emergency Notification System within 1 hour after discovery. Notifications must be made according to 10 CFR 73.77(c).

Subsection 73.77(a)(2) requires licensees subject to the provisions of 10 CFR 73.54 to notify the NRC Headquarters Operations Center of the cybersecurity events identified at 10 CFR 73.77(a)(2)(i)–(iii) through the Emergency Notification System within 4 hours after discovery. Notifications must be made according to 10 CFR 73.77(c).

Subsection 73.77(a)(3) requires licensees subject to the provisions of 10 CFR 73.54 to notify the NRC Headquarters Operations Center of the cybersecurity events identified at 10 CFR 73.77(a)(3) through the Emergency Notification System within 8 hours after discovery. Notifications must be made according to 10 CFR 73.77(c).

Subsection 73.77(b) requires licensees subject to the provisions of 10 CFR 73.54 to record cybersecurity events identified at 10 CFR 73.77(b) using the site corrective action program within 24 hours after discovery.

Subsections 73.77(c)(1)–(4) describe the notification process. The burden for these notifications is captured under 10 CFR 73.77(a)(1)–(3).

Subsection 73.77(d) requires licensees making an initial telephonic notification of cybersecurity events to the NRC according to the provisions of 10 CFR 73.77(a)(1), (a)(2)(i), and (a)(2)(iii) to also submit a written security follow-up report to the NRC within 60 days of the telephonic notification, using NRC Form 366, “Licensee Event Report.” Licensees are not required to submit a written security follow-up report following a telephonic notification made under 10 CFR 73.77(a)(2)(iii) and (a)(3).

Subsection 73.77(d)(12) requires licensees to maintain a copy of the written security follow-up report of an event submitted under 10 CFR 73.77, “Cyber security event notifications,” as a record for a period of 3 years from the date of the report or until the NRC terminates the license for which the records were developed, whichever comes first.

Section 73.1200(a) requires licensees to notify the NRC Headquarters Operations Center as soon as possible, but within approximately 15 minutes after the discovery of an imminent or actual hostile action or the notification by law enforcement or government officials of a potential hostile action or sabotage within the next 12 hours against the licensee's facility. The report must identify the facility name, the type of threat or event, and the status of the threat or event (new requirement).

Section 73.1200(b) requires licensees to notify the NRC Headquarters Operations Center as soon as possible, but within approximately 15 minutes after discovery of an imminent or actual threat or the notification by government officials of a potential hostile action or sabotage within the next 12 hours against a shipment of Category I SSNM, SNF, or high-level waste. The report must identify the facility making the shipment, type of material being shipped, the last known location of the shipment, the type of threat or event, and the threat or event status (new requirement).

Section 73.1200(c) requires that each licensee subject to the provisions of 10 CFR 73.20, 73.45, 73.46, 73.50, 73.51, 73.55, 73.60, or 73.67 must notify the NRC Headquarters Operations Center no later than 1 hour after the time of discovery of a significant facility security event at a fixed site (existing requirement, no new burden as a result of the final rule).

Section 73.1200(d) requires that each licensee subject to the provisions of 10 CFR 73.20, 73.25, 73.26, 73.27, 73.37, or 73.67 must notify the NRC Headquarters Operations Center no later than 1 hour after the time of discovery of significant transportation security event (existing requirement, no new burden as a result of the final rule).

Section 73.1200(e) requires that each licensee subject to the provisions of 10 CFR 73.20, 73.45, 73.46, 73.50, 73.51, 73.55, 73.60, or 73.67 notify the NRC Headquarters Operations Center no later than 4 hours after time of discovery of a facility security challenge (existing requirement, no new burden as a result of the final rule).

Section 73.1200(f) requires that each licensee subject to the provisions of 10 CFR 73.20, 73.25, 73.26, 73.27, 73.37, or 73.67 notify the NRC Headquarters Operations Center no later than 4 hours after time of discovery of a transportation security challenge (existing requirement, no new burden as a result of the final rule).

Section 73.1200(g) requires that each licensee subject to the provisions of 10 CFR 73.20, 73.45, 73.46, 73.50, 73.51, 73.55, 73.60, or 73.67 notify the NRC Headquarters Operations Center no later than 8 hours after time of discovery of facility security program failure (existing requirement, no new burden as a result of the final rule).

Section 73.1200(h) requires that each licensee subject to the provisions of 10 CFR 73.20, 73.25, 73.26, 73.27, 73.37, or 73.67 notify the NRC Headquarters Operations Center no later than 8 hours after the time of discovery of transportation security program failure (existing requirement, no new burden as a result of the final rule).

Section 73.1200(m)(1)(i) requires licensees subject to 10 CFR 73.15 with enhanced weapons authority to immediately notify the ATF upon discovery of any stolen or lost enhanced weapons (new requirement; however, no increase in burden is assumed).

Section 73.1200(m)(1)(ii) requires licensees subject to 10 CFR 73.15 with enhanced weapons authority to notify the NRC Headquarters Operations Center as soon as possible, but not later than 4 hours subsequent to the notification of the ATF after the discovery of any stolen or lost enhanced weapons (new requirement; however, no increase in burden is assumed).

Section 73.1200(m)(1)(iii) requires licensees subject to 10 CFR 73.15 with enhanced weapons to notify the appropriate LLEA within 48 hours after the discovery of any stolen or lost enhanced weapon (new requirement; however, no increase in burden is assumed).

Section 73.1200(n) requires licensees subject to 10 CFR 73.15 with enhanced weapons to notify the NRC Headquarters Operations Center as soon as possible, but not later than 24 hours after receipt of an adverse inspection finding, enforcement finding, or other adverse notice from the ATF regarding these enhanced weapons or an ATF Federal firearms license (new requirement; however, no increase in burden is assumed).

Section 73.1200(q) requires licensees desiring to retract a previous security event notification (i.e., invalid, not reportable after further evaluation, or recharacterized as recordable under 10 CFR 73.1210, "Recordkeeping of physical security events") to notify the NRC Headquarters Operations Center (new requirement—codifies current voluntary practice).

Section 73.1205 requires each licensee making a telephonic notification under 10 CFR 73.1200 to submit a written follow-up report to the NRC within 60 days of making such notifications (existing requirement, no new burden as a result of the final rule for existing notifications; however, new burden for new notifications, but no increase in burden assumed for written reports associated with 10 CFR 73.1200(m) and (n) notifications).

Section 73.1210 requires each licensee subject to the provisions of 10 CFR 73.20, 73.25, 73.26, 73.27, 73.37, 73.45, 73.46, 73.50, 73.51, 73.55, 73.60, or 73.67 to record within 24 hours of the time of discovery any less-significant physical security events and conditions adverse to security (for both facilities and transportation) that are specified in 10 CFR 73.1210(c)–(f) (existing requirement, no new burden as a result of the final rule).

Weapons Safety Assessment—The NRC has published the four-volume NUREG-2264, "Weapons Safety Assessment," issued March 2023, guidance document to assist licensees in completing the weapons safety assessment required under 10 CFR 73.15(e) and (f) as part of an application for combined preemption authority and enhanced weapons authority. Volumes 1 and 3 contain introductory and evaluatory material. Volume 2 contains the weapons safety assessment template that licensees will complete and submit with their applications under 10 CFR 73.15. Volume 4 contains a completed sample template for a hypothetical power reactor facility. A separate volume contains reference information on weapons capabilities and characteristics and is not publicly available for security reasons.

Suspicious Activity Reporting Requirements (10 CFR Part 73, Subpart T, "Security Notifications, Reports, and Recordkeeping")

The third part of the final rule requires licensees to report suspicious activity to local and Federal LLEAs, the NRC, and the Federal Aviation Administration (for suspicious aircraft activities).

Section 73.1215(d) requires each licensee subject to the provisions of 10 CFR 73.20, 73.45, 73.46, 73.50, 73.51, 73.55, 73.60, or 73.67 to report as soon as practicable, but within 8 hours of the time of discovery of suspicious facility-related activities. Category II and III SNM fuel

fabrication facilities are exempted from the requirements of 10 CFR 73.1215(d). Category II and III SNM enrichment facilities employing Restricted Data technology are exempted from the requirements of this paragraph but are subject to the requirements of 10 CFR 73.1215(f). Additionally, two sealed-source SNM licensees listed in 10 CFR 73.1215(g) are exempted from the requirements of this section (new requirement).

Section 73.1215(e) requires each licensee subject to the provisions of 10 CFR 73.20, 73.25, 73.26, 73.27, or 73.37 to report as soon as practicable, but within 8 hours of the time of discovery of suspicious transportation-related activities (new requirement).

Section 73.1215(f) requires licensees subject 10 CFR 73.67 that are engaged in Category II or III SNM enrichment (using Restricted Data technology) to report suspicious activities related to their Restricted Data information, technology, or materials (new requirement).

Appendix B to 10 CFR Part 73 sets the minimum training and qualification criteria for security personnel. Much of the information in this appendix repeats requirements listed earlier in this part with more detail. Where the appendix identifies new or additional requirements, they are captured below.

Subsection VI B.4.a.1 of Appendix B to 10 CFR Part 73 requires licensees to obtain and retain a written certification from a licensed physician that no medical conditions were disclosed by the medical examination that would preclude the individual's ability to participate in the physical fitness tests or meet the physical fitness attributes or objectives associated with assigned duties.

Subsection VI B.4.b.4 of Appendix B to 10 CFR Part 73 requires that a qualified training instructor document the physical fitness qualification of each armed member of the security organization, and that security supervisor attest to this qualification. The information collection for this requirement includes the requalification requirement contained in Section VI B.5.b of Appendix B.

Subsection VI B.5.b of Appendix B to 10 CFR Part 73 requires that a qualified training instructor document the physical fitness requalification of each armed member of the security organization, and that a security supervisor attest to this requalification. The information collection associated with this requirement appears in Subsection VI B.4.b.4 of Appendix B.

Subsection VI C.2.b of Appendix B to 10 CFR Part 73 requires that a licensee training instructor document, and a security supervisor attest to, each individual's on-the-job training.

Subsection VI C.3.a of Appendix B to 10 CFR Part 73 requires licensees to develop, implement, and maintain a documented PEP. The T&QP shall reference the PEP. This is a one-time requirement connected to 10 CFR 75.55(a).

Subsection VI C.3.g of Appendix B to 10 CFR Part 73 requires each tactical response drill and force-on-force exercise to include a documented postexercise critique in which participants identify failures, deficiencies, and other findings.

Subsection VI C.3.h of Appendix B to 10 CFR Part 73 requires documentation of scenarios and participants for all drills and exercises. The information collection associated with this requirement appears in Subsection VI C.3.g of Appendix B.

Subsection VI C.3.i of Appendix B to 10 CFR Part 73 requires licensees to enter findings, deficiencies, and failures identified in drills and exercises into the corrective action program. The information collection associated with this requirement appears in Subsection VI C.3.g of Appendix B.

Subsection VI C.3.m of Appendix B to 10 CFR Part 73 requires licensees to develop and document scenarios for drills and exercises. The information collection associated with this requirement appears in Subsection VI C.3.g of Appendix B.

Subsection VI E.1.b of Appendix B to 10 CFR Part 73 requires licensees to use firearms instructors who are certified from a national or State recognized entity. Each instructor's certification must specify the weapon type(s) for which the instructor is qualified to teach. Firearms instructors shall be recertified in accordance with the standards recognized by the certifying national or State entity, but in no case shall recertification exceed 3 years.

Subsection VI E.1.d of Appendix B to 10 CFR Part 73 requires licensees to include in their T&QP the additional standards of target identification and engagement, weapon malfunctions, cover and concealment, and weapon familiarization. This is a one-time requirement whose burden is included in 10 CFR 73.55(a).

Subsection VI F.1.b of Appendix B to 10 CFR Part 73 requires licensees to document and retain the results of weapons qualification and requalification.

Subsection VI F.2 of Appendix B to 10 CFR Part 73 requires that licensees' written T&QPs describe the firearms used, the firearms qualification program, and other tactical training required to implement their NRC-approved security plans, protective strategy, and implementing procedures. This is a one-time requirement whose burden is included in 10 CFR 73.55(a).

Subsection VI F.5.a of Appendix B to 10 CFR Part 73 requires licensees to requalify armed members of the security organization for each assigned weapon at least annually, in accordance with NRC requirements and the NRC-approved T&QP, and to document and retain the results as a record. The information collection associated with this requirement appears in Subsection VI F.1.b of Appendix B.

Subsection VI G.3.a of Appendix B to 10 CFR Part 73 requires licensees to include in the T&QP a firearms maintenance and accountability program to ensure that weapons and ammunition are properly maintained, function as designed, and are properly stored and accounted for. This is a one-time requirement whose burden is included in 10 CFR 73.55(a).

Subsection VI H.1 of Appendix B to 10 CFR Part 73 requires licensees to retain all reports, records, or other documentation required by Appendix B in accordance with the requirements of 10 CFR 73.55(q). The burden for this requirement is included in each specific recordkeeping requirement.

Appendix C, "Licensee Safeguards Contingency Plans," to 10 CFR Part 73 describes the specific requirements for the SCP required by 10 CFR 73.20 and 10 CFR 73.55(c)(5). There are no additional information collections in Appendix C.

Confirmatory Action Letter (CAL) No. NRR-02-005, dated October 28, 2002, requires research and test reactors (currently called nonpower reactors) to establish a physical security and access authorization program. The implementation plans were submitted for this CAL when the

compensatory measures were first issued in 2003 and 2005, and there are currently no submissions. Compensatory measures have now been incorporated into the PSP. Burden for ongoing recordkeeping is captured in the estimates for establishing and maintaining NRC-approved PSPs, T&QPs, and SCPs.

10 CFR PART 73 GUIDANCE DOCUMENTS

Title	Agencywide Documents Access and Management System (ADAMS) Accession No. or Link
Regulatory Guide (RG) 1.206, "Applications for Nuclear Power Plants," Revision 1, October 2018	ML18131A181
NRC Regulatory Guides—Materials and Plant Protection (Division 5)	https://www.nrc.gov/reading-rm/doc-collections/reg-guides/protection/rg/
RG 7.13, "Transportation Security Plans for Classified Matter Shipments," Rev. 0, June 2015	ML14287A484 (nonpublic)
NUREG-0561, "Physical Protection of Shipments of Irradiated Reactor Fuel," Revision 2, April 2013	ML13120A230
NUREG-1619, "Standard Review Plan for Physical Protection Plans for the Independent Storage of Spent Fuel and High-Level Radioactive Waste," July 1998	ML020720453
Generic Letter 91-03, "Reporting of Safeguards Events," March 6, 1991	ML031140131
Nuclear Energy Institute (NEI) 03-12, "Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Program]," Revision 7, October 2011	SGI document (endorsed by NRC in a memo dated November 10, 2011, ML112800379)
NEI 03-12, "Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, [and Independent Spent Fuel Storage Installation Security Program]," Revision 7.1, January 2018	SGI document (approved for use by NRC in a memo dated December 4, 2018, ML18137A359)
NEI 08-09 (NRC-endorsed), "Cyber Security Plan for Nuclear Power Reactors," Revision 6, April 2010	ML101180437
NEI 08-09 (NRC-endorsed), Addendum 7, "Evaluating and Documenting Use of Alternative Cyber Security Controls/Countermeasures," December 2018	ML19058A511
NEI 11-08 (NRC-endorsed), "Guidance on Submitting Security Plan Changes," Revision 0, August 2012	ML12216A194
NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, October 2009	ML092931123
Firearms Guidelines (see below)	
RG 5.86, "Preemption Authority, Enhanced Weapons Authority, and Firearms Background Checks," Revision 1, April 2024	ML23299A173
RG 5.87, "Suspicious Activity Reports under 10 CFR Part 73," Revision 1, May 2024	ML23299A172

Title	Agencywide Documents Access and Management System (ADAMS) Accession No. or Link
RG 5.62, “Physical Security Event Notifications, Reports, and Records,” Revision 3, September 2024	ML23299A176
NUREG-2264, “Weapons Safety Assessment,” Volume 1, March 2023	ML23061A077
NUREG-2264, “Weapons Safety Assessment,” Volume 2, March 2023	ML23061A078
NUREG-2264, “Weapons Safety Assessment,” Volume 3, March 2023	ML23061A079
NUREG-2264, “Weapons Safety Assessment,” Volume 4, March 2023	ML23061A080
NUREG/BR-0531, Revision 1, “NRC Safeguards Information Program: Helpful Resources for Applicants and Preapplicants,” February 2025	ML25038A063