

## HARRIS— Security Performance

### Case Study

<b>Client (Plant)</b>	<b>Period of Performance</b>	<b>Brief Description of Project</b>
Duke – Harris	August-October 2016	review protective strategy
<b>Problem/Issue</b>		<b>Action Taken</b>
Duke is considering revising its protective strategy to identify assets that could be repositioned or removed to find efficiencies and asset savings under 10 CFR 50.54(p) or 50.90		EXCEL dispatched a 3-person team to the site, reviewed inspection records and NRC reports, current physical security plan commitments and other documentation, and observed limited scope drills. Recommendations were captured in a written report.
<b>Solution</b>		
EXCEL team determined that certain assets could be eliminated without impacting the effectiveness of the security program performance. These were recommended to be submitted as 10 CFR 50.54(p) changes. Other recommendations were identified but were relegated to 10 CFR 50.90 changes to the PSP, and some required capital investment by the utility.		
<b>Benefits to the Client</b>		
Using standard industry computations, each human post costs about \$450K per year. Each asset reduction represents significant savings on an annual basis with no apparent cost to the plant. Even changes that cost a bit are easily paid for by the savings. And crafting a justification for the PSP change under 50.54(p) allows the plant to implement them without prior NRC approval, a process that sometimes takes 18 months.		
<b>Lessons that might apply to other clients</b>		
This review (like others before it) can provide substantial annual cost savings with no reduction in security program performance. Because the narrative is strongly regulatory, EXCEL input is necessary to successfully deliver a PSP change that the NRC is unlikely to challenge.		
<b>Feedback from Client</b>		
The Duke fleet director of security submitted the recommendations to NRC and received positive feedback. He then passed on the compliments to EXCEL and asked that we conduct similar evaluations at his other plants.		