



The Physical Protection of Nuclear Material and Nuclear Facilities through an Outcome Focused Security Regime

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Aim

Explain the possible advantages and challenges of an 'outcome focussed' regulatory regime for the protection against the unauthorised removal of nuclear material and the sabotage of nuclear material and facilities.

Scope

- Context
- Disadvantages of prescriptive security regimes
- Advantages of ‘outcome focused’ security regimes
- Challenges and limitations
- Potential benefits

Regulatory Context Within the UK

- The diverse, mature, nature of the industry
- Rapidly changing character of threats
- One nuclear regulator – safety, security, safeguards
- Nuclear safety regulation is based on a ‘non-prescriptive’ goal-setting approach.
- Security regulation is based upon approvals of security plans
- Evolution towards outcome-focussed security regulation

Disadvantages of Prescriptive Security Regimes

- Lack of ownership at senior levels
- No incentive to evolve security capacity/capability
- Focus on ‘guns, gates and guards’
- Setting precise standards across a diverse industry is resource intensive
- Greater ‘risk-ownership’ placed upon on the Regulator

Advantages of 'Outcome focussed' Security Regimes

- Encourages 'ownership' of security risks at senior levels within the industry
- Encourages cultural change
- The right security standards can be applied at the right time, with minimal delay to achieve the required security outcomes
- Reduces the resource-intensive need to frequently change prescriptive standards

Regulatory Challenges

- Markedly different approach for security regulators – no more ‘just do it’
- Few ‘defined standards’ or requirements – claims, arguments, evidence
- Increased need for regulators to use experience and judgement
- Acceptance of ‘non-traditional’ security solutions
- Assessment of ‘duty holders’ ability to manage security

Potential Challenges for Industry

- Increased demands on security professionals
- Impact of legacy systems
- Internal security assurance processes

Potential Benefits

- Regulatory resources can be more focussed
- Industry has greater ownership of security and drives forward improvements
- Security within industry can be better integrated with broader management/business processes
- Potential opportunities for innovative security solutions
- More responsive to emerging threats

Summary

- Disadvantages of prescription
- Advantages of 'outcome focussed' regulation
- Challenges
- Potential benefits

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