

UCS Comments on Force-on-Force (FOF) Inspection Tactics, Techniques and Procedures

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FOF inspections and public confidence

- Unlike safety inspections, there is little public information about the results of security inspections
 - Inspection report cover letters and color findings (either green or “greater than green”)
 - Annual compilation of security inspection findings
- In order for the public to have confidence in nuclear plant protection, there must be high confidence in the process for security oversight
 - For example, how to explain the apparent lack of visible security at the owner controlled area boundary (OCA) at some plants?



The integrity of FOF inspections

- UCS welcomes the findings of the lessons-learned review (SECY-14-0088, with redacted Enclosure 1):
 - The current policies and practices for NRC-conducted FOF inspections are consistent with all legal and regulatory requirements, guidance, and Commission direction
 - No instances were found where licensees were evaluated against an adversary force in excess of the DBT, contrary to NEI assertions
 - Tactics and techniques utilized by the Composite Adversary Force are in accordance with the DBT and Adversary Characteristics Document (ACD)

Issues that could affect public confidence

- Why have members of licensee senior management not been fully engaged in addressing FOF inspection findings?
- Why does the NRC no longer make public the FOF SDP?
 - Release of Enclosure 1 of SECY-14-0088 has revealed that a recent SDP revision has reduced the significance of a simulated loss of a complete target set from White to Green in some cases

Force-on-force versus baseline security inspections

- UCS does not agree with NEI's proposal that NRC eliminate NRC-conducted FOF inspections and rely instead only on evaluation of licensee-run FOF exercises
- UCS also opposes diluting the significance of FOF inspection findings by combining them with those of other security inspections or adjusting them based on the outcomes of other security inspections
 - Force-on-force inspections provide fundamentally different information than the results of baseline security inspections, including licensee-run drills and exercises
 - "... the working group found that licensees' self-assessment programs have not challenged many sites..." – SECY-14-0088, Enclosure 1 (redacted)
- It is important that FOF inspections remain distinct from other security inspections and, in particular, that associated findings are separately considered in the ROP

Tactics, techniques and procedures

- To maintain public confidence in FOF inspections, assurances are needed that they simulate real attacks to the maximum extent possible while maintaining site safety and security
- The element of surprise must be preserved by creative use of all tactics, techniques and procedures (TTP) consistent with the design basis threat (DBT)
- It is not only fair, but essential, for the composite adversary force (CAF) to utilize novel TTPs to assess the flexibility of licensee contingency response to respond to unfamiliar scenarios
- SECY-14-0088, Enclosure 1 (redacted) notes that “licensees are not always prepared to deal with tactics that NRC does not frequently employ during regulated exercises”

Tactics challenged by licensees

- SECY-14-0088 Enclosure 1 (redacted) lists a number of CAF tactics that have been challenged by individual licensees
 - Throwing a rock instead of a grenade
 - Scaling walls without including the time to don safety harnesses (an OSHA requirement)
 - Throwing objects from elevated positions

Other issues

- It appears from SECY-14-0088, Enclosure 1 (redacted) that in some cases, FOF scenarios have been challenged because of controller or simulation issues
 - eg. use of gas grenades
 - Credible TTPs should not be excluded merely because they are difficult to simulate, control or evaluate
- SECY-14-0088 also makes clear that licensee controller training needs improvement, especially to reduce unplanned timeouts and to address the problem of a “leaning forward” exercise posture
- The staff makes a very compelling case for restoring MILES to original condition; not clear why the Commission referred resolution of that issue to the Working Group

TTP working group

- The licensees' concerns about certain TTPs being unfair or beyond the DBT do not appear to be justified
- The TTP working group should focus on ensuring that TTPs are challenging and fully take into account real-world events, with appropriate consideration of emerging threats (e.g. so that they are not only reactive, but proactive)
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