



Revision 1 to Regulatory Guide 5.75, “Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities”

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Meeting Agenda

- ❖ Introduction and Opening Remarks
- ❖ Discussion Topics
 1. Mock Adversary Force (MAF) Training & Qualifications
 2. Medical Qualifications
 3. Use of Deadly Force
 4. Systematic Approach to Training (SAT) Process
 5. Force-on-Force Exercise Critiques
- ❖ Closing Remarks

Mock Adversary Force (MAF) Training & Qualifications

Industry Concern:

- No regulatory basis to support the training and qualification requirements for a MAF
- Requirement for licensees to hold combined enhanced weapons authority for MAF

NRC Staff Position:

- Inspection and operating experience have shown wide variation in how licensees train their personnel to perform MAF duties.
- Regulatory basis for MAF training and qualifications:
 - 10 CFR Part 73, Appendix B, Section VI, Paragraph A.5
 - 10 CFR Part 73.1 (a)(1)(A)
- The NRC staff does not intend for licensees to purchase enhanced weapons and has added clarifying language in Section 5.16.1(u) to address the potential for licensees to incorrectly interpret the guidance.

Mock Adversary Force (MAF) Training & Qualifications, Cont.

NRC Staff Position:

- Section 5.16.1(u) changed to read:
“Demonstrate firearms proficiency as stipulated in Appendix B of Part 73 and possess a thorough understanding of the characteristics and capabilities of design basis threat weapons, ammunition and munitions and apply such characteristics and capacities during drills and exercises. Licensees are not expected to purchase weapons or ammunition beyond what is currently listed in Section 9 of their physical security plan.”

Medical Qualifications

Industry Concern:

- For the performance of physicals, Regulatory Guide (RG) language is more stringent than 10 CFR 73, Appendix B language.
 - 10 CFR 73, Appendix B: “licensed health professional”
 - RG: “licensed physician or physician’s assistant”

NRC Staff Position:

- The NRC staff intended to provide a few examples of a “licensed health professional,” as learned from operating experience.
- Change to RG: “licensed health professional (e.g., licensed physician, licensed physician’s assistant, licensed nurse practitioner, or licensed nurse)”

Use of Deadly Force

Industry Concern:

- Guidance is too generic and vague
- Licensees should be left to determine how best to meet the training requirements for the use of deadly force

NRC Staff Position:

- Revision 1 of RG 5.75 incorporates content from Information Notice (IN) 89-05, “Use of Deadly Force by Guards Protecting Nuclear Power Reactors Against Radiological Sabotage” (January 1989).
- The NRC staff agrees that licensees should be left to determine how best to meet the training requirements for the use of deadly force in accordance to state law.
- No change has been made to the RG.

Systematic Approach to Training (SAT) Process

Industry Concern:

- Flawed content on SAT Process in “Discussion” should be removed
- Includes a withdrawn Institute of Nuclear Power Operators (INPO) document
- NEI 13-07, “Guidance on a Systematic Approach to Training for Nuclear Security,” is available to licensees

NRC Staff Position:

- Section B is “Discussion” and includes background information. Section C, “Staff Regulatory Guidance,” contains staff’s guidance on how to meet regulations.
- INPO-AP-921: Referenced in original RG 5.75
- NEI 13-07 has not been endorsed by the NRC staff.

Force-on-Force Exercise Critiques

Industry Concern:

- Sections on force-on-force exercise critiques should be removed
 - NEI 03-11, “Guidance for the Preparation and Conduct of Force-on Force Exercises,” (2014) includes updated guidance for the conduct of force-on-force exercise critiques.

NRC Staff Position:

- Violations have been issued to licensees for conducting exercise critiques incorrectly; Sections 5.19 and 5.20 aim to clarify expectations for exercise critiques.
- RG offers one acceptable way to conduct force-on-force exercise critiques.
- NEI 03-11 has not been endorsed by the NRC staff.

Closing Remarks



Questions?