

Status of Staff Assessment in Response to SRM-SECY-16-0073

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Office of Nuclear Security and Incident Response

Division of Security Operations
Division of Security Policy



Agenda

- Objectives
- Background
- Assessment Process
- Potential Pilot Programs
- Vulnerability Assessments
- Crediting Operator Actions and FLEX equipment
- Crediting Law Enforcement
- Next Steps
- Comments and Questions

Objectives

- Provide an opportunity to solicit and receive stakeholder feedback
- Present an overview of staff efforts
- Present the status of security baseline inspection program assessment
- Discuss the path forward

Background

SRM-SECY-16-0073, “Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088,” October 5, 2016

- Avoid a fundamental redesign of the program
- Limited to areas most likely to yield improvements and efficiencies
- Staff should include in its evaluation:
 - Protective strategy evaluation using vulnerability assessments
 - Crediting operator actions and the use of FLEX equipment
 - Crediting law enforcement to establish coping time for security events
- Legal analysis for NRC observation of licensee FOF vice conducting the exercise
- Staff response to the Commission - October 2017

Assessment Process

- Focused on power reactor security baseline inspection program
- Internal and external stakeholder feedback
- Detailed review of security baseline inspection program documents
 - Inspection Manual Chapter 2201
 - Inspection Procedure 71130
- “high assurance” is equivalent to “reasonable assurance”

Stakeholder Feedback

- NEI Letter (ML17046A218) – Supports the NRC Commission direction in SRM
 - Improve scheduling coordination between Regional and HQ inspectors
 - Removal of redundant inspection items
 - Revise FOF inspection schedule for improved efficiency
 - Developing a proposed methodology for crediting operator actions (OA), FLEX equipment and law enforcement (LE) response
 - Suggested pilot programs

Stakeholder Feedback

- **Staff Review and Input**

- Review IMC 0307, “Reactor Oversight Process Self-Assessment Program” findings
- Working Group Sessions – Regional and HQ staff identification of areas where efficiencies may be gained
- Programmatic oversight of security baseline inspection program including FOF
- Identification of current requirements for crediting OA, FLEX equipment and LE response
- Suggested pilot programs

Inspection Program Review

- Review of IMC 2201 and IP 71130 to include evaluation of:
 - Inspection periodicity
 - Redundant inspection items
 - Minimum sampling ranges for each IP
 - Improve inspection schedule coordination
- Assessment Team
 - Security Inspectors from each region
 - Headquarters staff from policy, oversight and inspection branches

Potential Pilot Programs

- Reduction of timeout's during FOF exercise
- Reduce the number of FOF exercises per inspection
- Revise FOF inspection schedule per attachment 2 of NEI letter (ML17046A218)
- Perform a defense-in-depth evaluation in lieu of second FOF exercise per attachment 3 of NEI letter (ML17046A218)

Vulnerability Assessments

- Evaluation of expanded use of vulnerability tools to improve efficiency and effectiveness of licensing and inspection activities
 - Computer based products
 - Manual calculations
 - Results are currently used as supplemental information to justify security plan changes

Operator Actions and the Use of FLEX Equipment

- Current Requirements
 - Statement of Consideration, Power Reactor Security Requirements, Final Rule, 74FR13926, 13960 (March 27, 2009)
 - Regulatory Guide 5.81, Target Set Identification and Development for Nuclear Power Reactors
 - Controlled document – Security Related Information
 - Section 6.4.1 – Preventive Actions – in-depth review of the evaluation criteria
- NEI SRM Response letter
 - Industry is developing a guidance document with a proposed assessment methodology

Crediting Law Enforcement Response

- Current Requirements
 - NRC Commission Policy - Statement of Consideration, Power Reactor Security Requirements, Final Rule, 74FR13926, 13940 (March 27, 2009)
 - Potential options
 - Use of integrated response (IR) framework as an evaluation tool for law enforcement response
 - Utilize coping time as part of a licensee's protective strategy
- NEI SRM Response letter
 - Industry is developing a guidance document with a proposed assessment methodology

Next Steps for Staff Response to SRM

- Assessment of security baseline inspection program procedures
- Feasibility review of proposed pilot programs and efficiency recommendations
- Coordination with stakeholders
- Submission of staff response to the Commission

Questions

BACK-UP SLIDES

Summary of Current Staff Actions

- Annual reactor oversight process (ROP) self assessment
- Clarification of staff position regarding armed security officer (ASO) response timelines
- Revision to the MILES equipment contract
- Implemented use of reactor program system (RPS) to streamline the FOF exercise notification process
- Data collection to support oversight and alignment of regional consistency while implementing IP71130.14¹
- Intrusion detection system challenge testing during IP71130.03²
- Use of force interviews during IP71130.03

¹ IP71130.14 – “Review of Power Reactor Target Sets”

² IP71130.03 – “Contingency Response, Force-on-Force Testing