

Resuming NRC-Conducted Force-on-Force Exercises During the COVID-19 Public Health Emergency

July 9, 2020

➤ Purpose

- To discuss the criteria for resuming NRC-conducted force-on-force (FOF) inspection activities and the plan for FOF inspection activities during the COVID-19 Public Health Emergency (PHE)

➤ Agenda

- Background
- NRC Update on Considerations for Resuming NRC-conducted FOF Inspections
- NRC Plan for FOF Inspection Activities during the PHE
- Industry Considerations for Resuming Inspections
- Stakeholder Comments/Questions

Background

- NRC has taken action to enable licensees to implement social distancing and assembly recommendations to conform to guidance from the federal government as well as state and local policies.
 - NSIR postponed all NRC-led FOF inspections scheduled through June 2020
 - Staff recognizes that social distancing measures implemented by sites present a challenge for conducting a FOF inspection per the IP 71130.03 as currently designed.
 - During a closed public meeting held on May 12, and open public meeting held on June 16, industry voiced concerns over resuming onsite inspections due to impacts to currently-implemented pandemic plans, risk of infection being introduced to sites, and the size and nature of FOF inspections (especially NRC-conducted exercise week activities)
 - Inspection concerns include challenges associated with use of personnel protective equipment (PPE) during exercises, the need to conduct multiple briefings to ensure social distancing due to conference room capacity, and having multiple individuals in a bullet resistant enclosure during exercises.

Considerations for Resuming NRC-Conducted FOF Inspections

| | Considerations for Force-on-Force Inspections during the COVID-19 Public Health Emergency | Current Status and Items for Discussion during Public Meeting |
|---|--|---|
| 1 | Access to hotels & restaurants within commuting area of site available | All 17 sites scheduled for inspection in 2020 currently have options available for food and lodging. |
| 2 | Airline travel available (as required) | Airline travel is available for all sites. |
| 3 | Out-of-State travel restrictions lifted (i.e., requirement to self-quarantine upon arrival in state) | <p>15 out of 17 sites currently meet this criteria. Two sites are impacted by quarantine requirements. (Florida has a 14-day self-quarantine requirement for individuals traveling from New York, New Jersey, or Connecticut, and Nebraska has a 14-day self-quarantine requirement for individuals traveling from international locations.)</p> <p>No inspection participants (i.e., NRC staff, contractors who provide services associated with multiple integrated laser engagement systems (MILES), SOCOM advisors, or mock adversary force directors) are currently affected by travel restrictions.</p> |
| 4 | Stay at home orders lifted | All 17 sites scheduled for inspection in 2020 currently meet this criterion. |
| 5 | Travel conditions allow DOE MILES trailer travel to inspection location in reasonable duration | All 17 sites scheduled for inspection in 2020 are in locations where the trailer can be effectively routed. |

Considerations for Resuming NRC-Conducted FOF Inspections

| | Considerations for Force-on-Force Inspections during the COVID-19 Public Health Emergency | Current Status and Items for Discussion during Public Meeting |
|---|---|--|
| 6 | Facial coverings or other protective supplies available for the inspectors | Facial coverings or other protective supplies are available for the NRC inspectors, SOCOM advisors, and MILES contractors. |
| 7 | Site conditions support inspection (less than 10 employees with active positive cases onsite) | All 17 sites scheduled for inspection in 2020 currently meet this criterion. |
| 8 | Social distancing guidance can be achieved while on-site or PPE can be effectively used | Protocols were presented during the closed meeting on May 12, 2020, regarding NRC recommendations for implementing social distancing during exercise activities. The NRC recognizes that measures for protecting staff in bullet-resistant enclosures is of high interest. Protocols for operator licensing, outages, and minimizing contact between different security shifts could be leveraged for best practices. Inspection activities in 2020 will help inform when this criterion can be met. |
| 9 | Security staff available from site shifts or other sites to support inspection positions | The NRC will coordinate with sites on an individual basis to obtain information on availability of staff to serve as players and controllers, and to ensure suitable coverage for routine shift coverage. |

Considerations for Inspections During a PHE

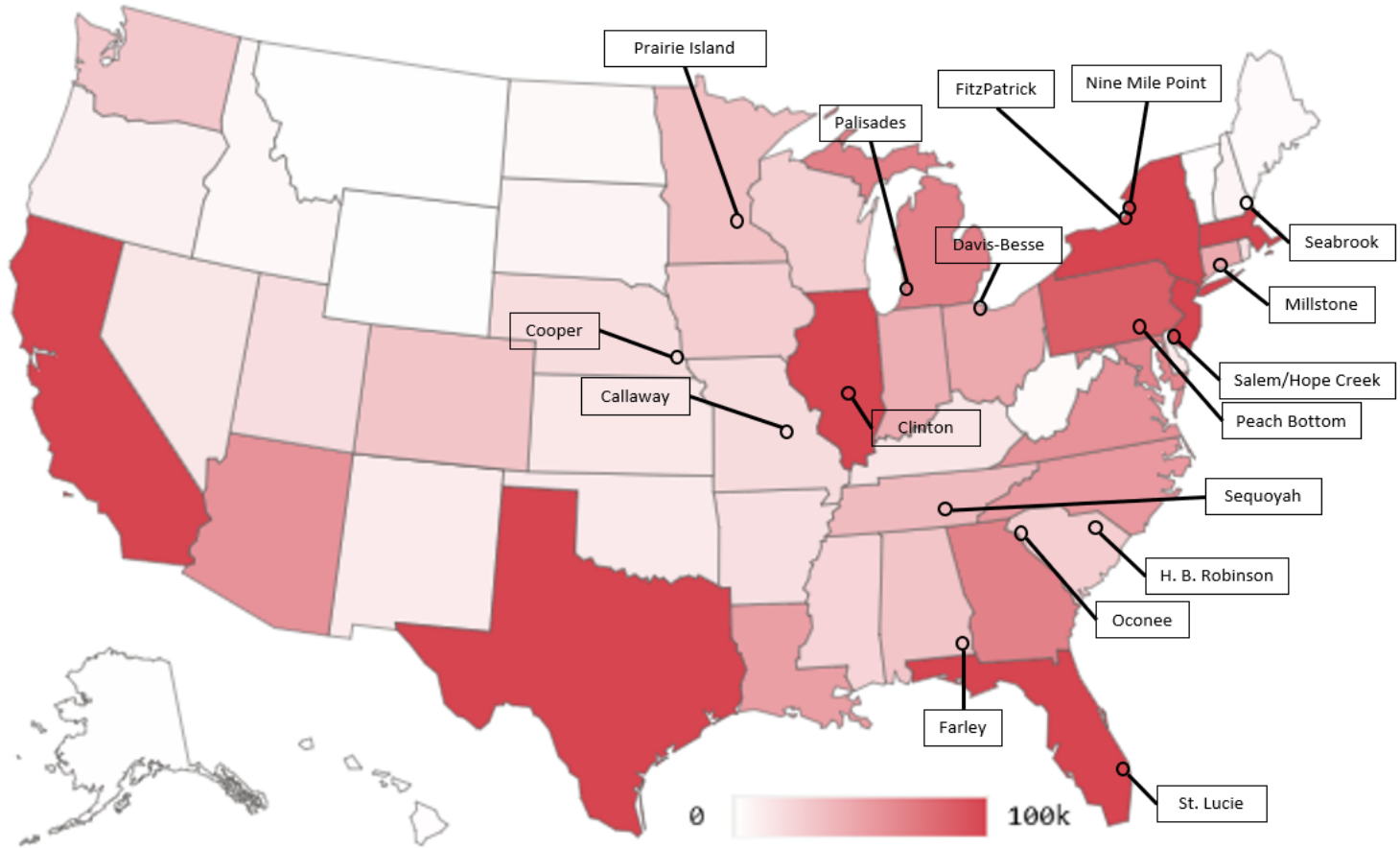
- NRC staff will monitor these conditions routinely for each site that is scheduled for inspection.
- In addition to considering travel restrictions that may be imposed on inspection participants based on their geographic location, NRC will not permit inspection team members to travel if they have symptoms associated with COVID-19, or have been in contact with a person who is presumed positive, or has tested positive for the virus within 14 days preceding the start of travel.
- NRC believes considerations 1-6 are currently met, and appreciates input from industry on all considerations, most notably considerations 7-9.

FOF Inspection Considerations

| Site | Location | Inspection Week | SAH Order Lifted | NRC PPE Available | Access Hotel/Rest | Air Travel Restrictions | No OOS Travel Restrictions | Security Staff Available for Support |
|--------------------|---------------------|-----------------|------------------|-------------------|-------------------|-------------------------|----------------------------|--------------------------------------|
| V. C. Summer | Jenkinsville, SC | - | | | | | | |
| Millstone | Waterford, CT | 24-Aug-20 | | | | | | |
| Peach Bottom | Delta, PA | 31-Aug-20 | | | | | | |
| Farley | Dothan, AL | 14-Sep-20 | | | | | | |
| Seabrook | Seabrook, NH | 14-Sep-20 | | | | | | |
| Oconee | Seneca, SC | 14-Sep-20 | | | | | | |
| HB Robinson | Hartsville, SC | 21-Sep-20 | | | | | | |
| Salem & Hope Creek | Hancocks Bridge, NJ | 21-Sep-20 | | | | | | |
| St. Lucie | Jensen Beach, FL | 28-Sep-20 | | | | | | |
| Nine Mile Point | Oswego, NY | 5-Oct-20 | | | | | | |
| Clinton | Clinton, IL | 19-Oct-20 | | | | | | |
| Sequoyah | Soddy Daisy, TN | 19-Oct-20 | | | | | | |
| Palisades | Covert, MI | 26-Oct-20 | | | | | | |
| Davis-Besse | Oak Harbor, OH | 2-Nov-20 | | | | | | |
| Fitzpatrick | Lycoming, NY | 2-Nov-20 | | | | | | |
| Prairie Island | Welch, MN | 16-Nov-20 | | | | | | |
| Cooper | Brownville, NE | 16-Nov-20 | | | | | | |
| Callaway | Fulton, MO | 7-Dec-20 | | | | | | |



FOF Heat Map



NRC PLAN FOR FOF INSPECTION ACTIVITIES DURING THE PHE

Infrequently Performed Inspections

- Inspection Manual Chapter (IMC) 2201, Appendix C
 - Inspection procedures that are implemented infrequently for special situations.
 - These inspections may be implemented in **response to events**, infrequent major activities at nuclear power plants, to evaluate emergent technical issues not related to licensee performance, to fulfill NRC's obligations under domestic interagency memoranda of understanding, or to implement the requirements of 10 CFR Part 75 for treaties between the United States and the International Atomic Energy Agency.
 - These inspections are not part of the baseline or supplemental inspection program elements.
 - Regional Administrator/Office Director authorization is required for their implementation.

Basis for Appendix C Procedure

- Uncertain duration of social distancing parameters
- Potential waves of infection rates
- 71130.03 inspection requires large number of site and inspection staff
 - Large gatherings for safety/controller briefings
 - May have difficulty maintaining social distancing protocols during exercises
- Use of modified inspection procedure supports comprehensive approach to assess readiness to defend site
 - Complements remainder of security baseline inspection program
- Potential impacts of PPE on exercise conduct is uncertain; limited scope exercises can help inform ability to use PPE in 71130.03 inspection

IMC 2201 Appendix C Procedure

- Activities to be completed by NRC inspection team in office, prior to week on-site (same as done to prepare for 71130.03, “Contingency Response – Force-on-Force Testing”) inspections):
 - Review past Triennial FOF performance for 2 cycles
 - Review drill & exercise information for site’s internal FOF program and associated corrective action program documents
 - Review current version of the site’s physical security plan
 - Review site’s protective strategy and contingency response procedures
 - Review recent or planned modifications to site’s security configuration

IMC 2201 Appendix C Procedure

- Activities to be completed by NRC inspection team during one week on-site:
 - Protective Strategy Assessment (same as done during 71130.03)
 - Owner Controlled Area, Protected Area, and Vital Area Tours (same as done during 71130.03)
 - Protective Strategy Tabletop Evaluation (same as done during 71130.03)
 - Limited Scope Tactical Response Drills (not done during 71130.03)

IMC 2201 Appendix C Procedure

- One week on-site
 - Normal FOF inspections (done in accordance with 71130.03) consists of two weeks on-site
- Minimize number of personnel that come to the site
 - Option to use licensee's Multiple Integrated Laser Engagement System (MILES) equipment or NRC-owned MILES equipment
 - Utilize site/fleet Mock Adversary Force
 - Doesn't require an entire extra security force and corresponding controllers to conduct limited scope tactical response drills
 - ~10 – 12 additional personnel (adversaries, controllers, armorers)
- Inspection guidance currently being drafted
- Sites inspected under this procedure will not receive a 71130.03 inspection during Cycle 6.
- NRC inspection team leader will coordinate with site to ensure consideration on slides 4-5 are met, as appropriate
 - Consideration 8 (PPE) will be applied, and extent to which PPE can be effectively used in limited scope exercises will inform resumption of .03

Limited Scope Tactical Response Drills

- Will conduct 3 drills
 - MAF Directors will assist with developing scenarios
- Performed to evaluate the ability of one or more security response force members to effectively implement their protective strategy responsibilities
- Conducted to validate and test the protective strategy
- Provide a structured process to train personnel and evaluate key elements of the protective strategy by focusing on specific aspects of the strategy
- Inspectors will evaluate
 - Response within appropriate timelines
 - Response personnel use appropriate protection and cover
 - Response personnel are supplied with, or have readily available, the weapons and equipment necessary to execute their responsibilities and are appropriately trained and qualified in the use of the weapons and equipment
- Inspection team will not classify outcome (effective, ineffective, marginal, indeterminate) of drills

Social Distancing Recommendations for Inspection Activities

- **Inspection Activities:**

- Entrance/Exit Meetings/Critique: conducted virtually
- Protective Strategy Briefing: NRC review presentation with minimal licensee personnel. Room large enough to exercise social distancing.
- Site Tours: Conduct tours simultaneously; limit personnel on each tour.
- Tabletop Drills: Conduct only with lead and adversary controllers to minimize personnel.
- MAF Interface: Limit number of staff interaction in room big enough to practice social distancing.

Social Distancing Recommendations for Inspection Activities

- **Inspection Activities:**

- Adversary Mission Overview and Controller Briefing: Attended by minimal personnel in room/area big enough to practice social distancing.
- Controller/Safety Briefings/Critiques/Hot Washes: Room big enough to practice social distancing, multiple briefing may be necessary due to number of personnel required. Conduct virtually, if possible.
- MILES Issue and Return: Conducted outside with social distancing practices in place. Equipment sanitized before and after each drill, as necessary.
- Limited Scope Tactical Response Drills:
 - Inspection team observe from “distant” areas
 - Limit personnel in BREs
 - Players, MAF, and observers practice social distancing and wear facemasks when unable to space.
 - Licensee consider positioning of on-duty force to minimize exposure and stay in compliance.

Summary of Path Forward

- Consider feedback received from stakeholders on considerations for resuming normal NRC-conducted exercises (in accordance with 71130.03, “Contingency Response – Force-on-Force Testing”)
- Conduct inspections using IMC 2201 Appendix C procedure
 - All sites for CY 2020 have been notified of their scheduled inspections and are updated with changes as determinations are made
 - Social distancing measures and PPE will be used to promote health and safety during inspections
 - Sites inspected under this procedure will not receive a 71130.03 inspection during Cycle 6
 - Resume inspections under 71130.03 once considerations are satisfied (See slides 4-5)

Industry Presentation

Open Discussion