

Force-on-Force Inspections During COVID-19 Public Health Emergency

- Due to the COVID-19 public health emergency (PHE), the U.S. Nuclear Regulatory Commission (NRC) modified or deferred many of its planned inspection activities to align with practices recommended by the Centers for Disease Control and Prevention to limit the spread of the virus, and to protect the health and safety of plant personnel and NRC employees.
- Among these inspections were force-on-force (FOF) inspections, which were temporarily halted due to the nature of the inspections. Specifically, the complex and performance-based nature of FOF exercises requires extensive planning, a large number of interdisciplinary participants, and a broad range of activities that require gatherings of both small and large groups (e.g., site walkdowns, meetings, interviews, and tabletop exercises) and, in some circumstances, close quarters interactions (e.g., controllers, players, and on-duty staff in a bullet-resistant enclosure).
- Due to the continued safety concerns, full NRC-conducted FOF inspections may not be reinitiated in the near term. Therefore, the staff has developed an inspection procedure, in accordance with Inspection Manual Chapter (IMC) 2201, Appendix C, “Generic, Special, and Infrequent Inspections,” that will be used to perform prudent inspection activities during the ongoing special circumstances associated with the PHE.
- The inspection is not intended to be used to satisfy the minimum sample for FOF exercises within the Reactor Oversight Process. Consistent with IMC 2201 Appendix C, this is an infrequent inspection used only in special circumstances and requires Office Director approval to perform.
- The objectives of this procedure are:
 - to verify and assess specific key elements of the licensee’s protective strategy to ensure that it has been appropriately developed and designed to meet the general performance objective of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55(b) when all elements cannot be verified and assessed in accordance with Inspection Procedure 71130.03, “Contingency Response – Force-on-Force Testing,” due to a local, State, or Federal emergency beyond the control of the licensee and NRC
 - to gather sufficient information to develop a scenario that can be segmented into limited scope tactical response drills that allows for an assessment and verification of specific key elements of the ability of licensees’ physical security systems and security organization to meet the general performance objective of 10 CFR 73.55(b) and to determine whether any changes made to the physical protection program in response to a local, State, or Federal emergency (e.g., state of emergency, disaster, or public health emergency) have not adversely impacted the licensee’s implementation of their protective strategy.
 - to verify and assess the licensees’ ability to conduct limited scope tactical response drills in accordance with Commission-approved security plans, the licensee’s protective strategy, and implementing procedures consistent with 10 CFR Part 73, Appendix B, Section VI.C.3(c).
- NRC staff will conduct walkdowns of the owner-controlled, protected and vital areas to familiarize themselves with the licensee’s procedures and processes to detect, assess, and

interdict unauthorized vehicles, personnel, and equipment attempting to gain access to target set equipment, defensive positions, or other protective measures.

- NRC staff will observe tabletop exercises to understand how the licensee's physical protection program maintains the capability to detect, assess, interdict, and neutralize threats up to and including the DBT of radiological sabotage.
- NRC staff will observe performance of licensee security forces during limited scope tactical response drills.
 - Limited scope tactical response drills are performed to evaluate the ability of one or more security response force members to effectively implement a limited portion of the protective strategy responsibilities and to verify that changes made to the physical protection program in response to the PHE do not adversely impact the response capabilities.
- Inspection team will not classify the outcome of the limited scope tactical response drills in the same manner as we would classify the outcome of full-scale FOF inspections since the drills are limited in scope and a framework has not been designed to use drills to make a determination of a licensee's overall protective strategy effectiveness.
- The NRC will assess any deficiencies identified during the inspection in accordance with the NRC's significance determination process. NRC staff will ensure that the licensee enters into its corrective action program deficiencies that adversely affect or decrease the effectiveness of the protective strategy and physical protection program.