

2021 FOF Inspection Activities

Landscape

- In 2020, NRC staff launched IP 92707
 - Enabled performance testing of limited number of responders
 - Allowed assessment of individual responder actions and limited elements of the licensee protective strategy
- Circumstances associated with COVID-19 PHE continue; implementation of safety protocols have enabled increased ability to conduct oversight activities.
- In 2021
 - Apply lessons learned from IP 92707 and other inspections conducted in 2020 to continue to perform oversight in a risk-informed manner
 - Expand to include evaluation of denial strategies
 - Balance safety with more comprehensive evaluation of integrated protective strategy
 - Leverage application of TI to inform future program evolutions

Path Forward

➤ Generate Temporary Instruction

- “A” and “B” weeks
- Hybrid evaluation
 - One exercise that includes full pathway
 - Limited number of exercise participants
- Alternative assessment process
 - Leverage licensee’s corrective action programs
- Implement strategies to address COVID-19 considerations
 - Limit time on site to minimum necessary to conduct inspection
 - Use social distancing/facial coverings
- Infrastructure
 - Use NRC-owned MILES
 - Use JCAF/CAF for adversary force and limit to necessary attendees

➤ Begin inspections in March 2021

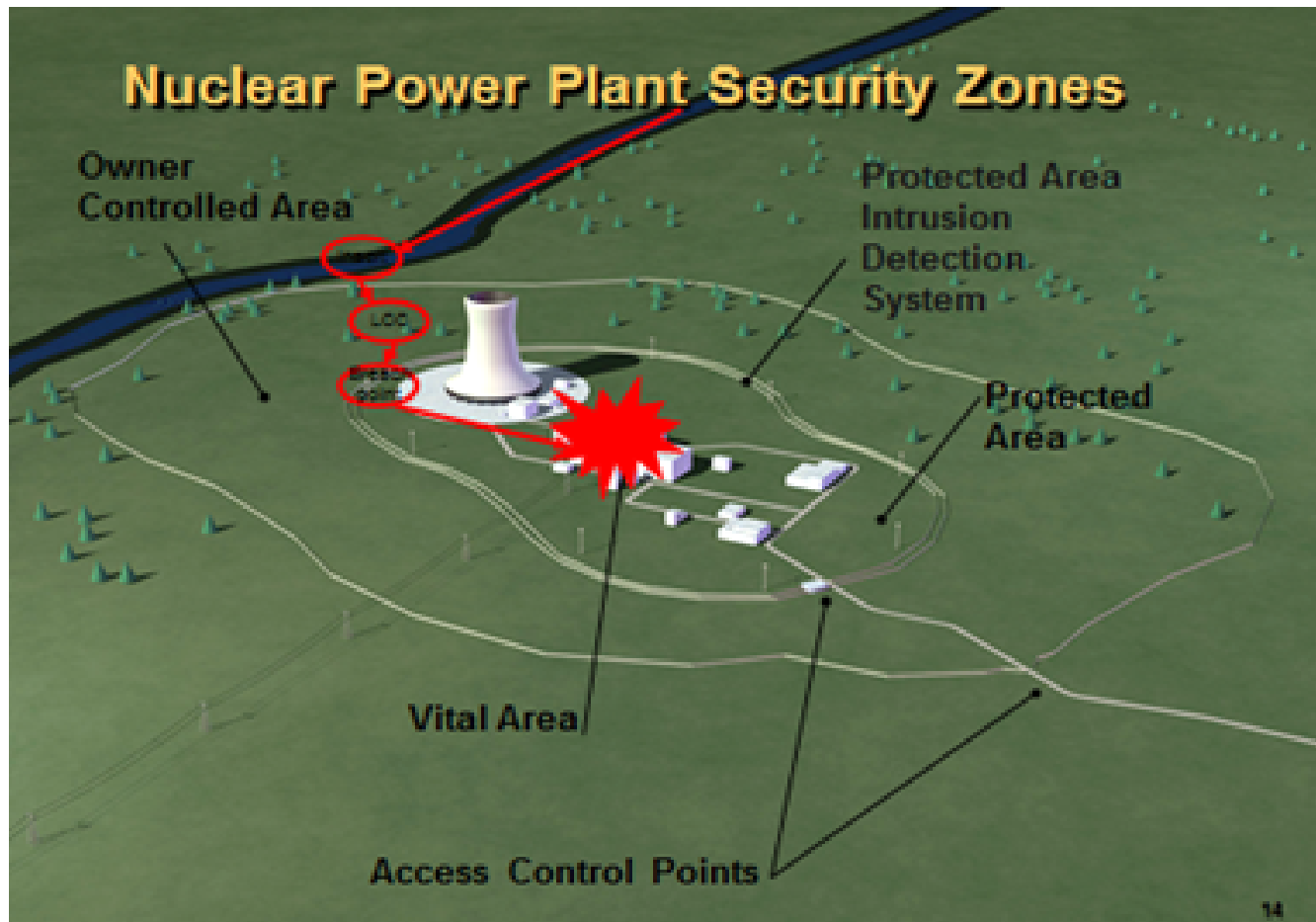
Inspection Structure

- Two-week inspection used to evaluate the licensee's security response
 - Planning week
 - Protective Strategy Briefing
 - Tabletop Drills
 - Site (Owner Controlled Area/Protected Area/Vital Area/Target Set) Tours
 - Exercise week
 - Matrix Review
 - Exercise Briefings; Safety, Controller, Adversary, Player & On-Duty
 - Exercise
 - Use the minimum number of members of the response force and the mock adversary team sufficient to execute the scenario being tested
 - a credible, realistic and thorough test of a site's protective strategy
 - evaluates the key security program performance elements bounded by the DBT
 - provides scenario controls and exercise controllers
 - tests responders in BREs with appropriate protective measures
 - Management Critique

Exercise Model

- One exercise
- Exercise begins in owner-controlled-area and progresses through the licensee's defense-in-depth

Exercise Model



Alternative Assessment Approach

- Concept was considered by staff during formulation of revised FOF framework in 2019
 - Considered eliminating the characterization of exercise outcomes
 - Use ROP security cornerstone activities to assess the ability of the licensee's physical protection program to defend against the DBT through the NRC's robust, multi-faceted inspection programs
 - NRC-conducted FOF exercise used to evaluate and assess the licensee's protective strategies

Alternative Assessment Approach

- FOF SDP will not be used for exercise outcomes
- Inspection team will use an alternative approach to assess licensee performance during exercises
 - No Vulnerabilities Identified
 - Potential Vulnerabilities Identified
- Inspection team will assess performance deficiencies related to other inspection activities using the security baseline SDP

Bullet Resistant Enclosures (BREs)

- Responders and controllers would only be in the BRE during the actual drill play. During timeouts and/or no play time the responder/controller would exit the BRE.
- Use portable/temporary BREs
- Implement compensatory measures
- Consider using available technology
- Use pods for staffing BREs
- Follow current CDC guidelines during the exercises to wear facial coverings if distance cannot be maintained.

Comparison between 71130.03, 92707, and TI

| Activity | Done during 71130.03 | 92707 | TI |
|--|----------------------|-------|----|
| Protective Strategy Briefing | ✓ | ✓ | ✓ |
| Tabletop Drills | ✓ | ✓ | ✓ |
| Site (OCA/PA/VA/Target Set) Tour | ✓ | ✓ | ✓ |
| Use NRC-owned MILES | ✓ | | ✓ |
| Use JCAF/CAF | ✓ | | ✓ |
| Exercise (with all security responders) | ✓ | | |
| Limited Scope Tactical Response Drills | | ✓ | |
| Exercise (only with security responders that would potentially have engagements during the exercise) | | | ✓ |
| Management Critique | ✓ | | ✓ |

Social Distancing Recommendations for Inspection Activities

- Entrance/Exit Meetings/Management Critique: conducted virtually
- Protective Strategy Briefing: NRC review presentation with minimal licensee personnel. Room large enough to exercise social distancing, divide people into more than one room, or use technology.
- Site Tours: Conduct tours simultaneously; limit personnel on each tour.
- Tabletop Drills: Include Ops and LLEA. Room large enough to exercise social distancing, divide people into more than one room, or use technology.
- MAF Interface: Limit number of staff interaction in room big enough to practice social distancing.

Social Distancing Recommendations for Inspection Activities

- Adversary Mission Overview and Controller Briefing: Attended by minimal personnel; room large enough to exercise social distancing, divide people into more than one room, or use technology.
- Controller/Safety Briefings/Hot Washes: Room large enough to exercise social distancing, divide people into more than one room, or use technology.
- MILES Issuance and Return: Conducted outside with social distancing practices in place. Equipment sanitized before and after each exercise.
- Exercises: Only staff necessary positions; determine compensatory/safety protocol measures for BREs

Realism/Consistency

➤ MILES Equipment

- use NRC-owned equipment
 - inconsistency in types of MILES equipment used across the industry
 - DOE calibrates equipment
- 3 DOE personnel need to come to site
- DOE staff have sanitization process for equipment

➤ MAF

- Use JCAF/CAF
- minimize number of personnel going to site

Considerations for Conducting Inspections in 2021

- Access to hotels & restaurants within commuting area of site available
- Airline travel available
- Facial coverings or other protective supplies available for the inspectors
- Site conditions support inspection
- Security staff available from site shifts or other sites to support inspection positions, as needed
- 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.