

Annual Licensee-Conducted Force-on-Force Exercises during the COVID-19 Public Health Emergency in Calendar Year 2022

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Office of Nuclear Security and Incident Response

Implementation of Annual FOF Exercises during CY 2022

- Licensee-conducted annual FOF exercises enable the security force to gain experience in tactics, protective strategy, and assigned duties within the contingency response plan.
- Part 73, Appendix B, Section VI, Subsection A.7
 - Annual requirements may be completed up to three (3) months before or three (3) months after the scheduled date.
- Regulatory Guide 5.75, "Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities", provides guidance on exercise conduct. RG is one acceptable approach and not the only means of performing evolutions.
 - Simulations and Artificialities (Section 5.7)
 - Cautions and Restrictions (Section 5.8)

Implementation of Annual FOF Exercises during CY 2022

- Recognize that circumstances associated with COVID-19 are dynamic.
- Planning for CY 2022 annual exercises continues to be complex. Considerations still include:
 - Using applicable regulatory guidance as a resource during planning
 - Benchmarking with licensees who have conducted annual exercises
 - Compensatory measures for bullet resistant enclosures
 - Continued use of facial coverings where social distancing cannot be achieved
 - Limit time spent in groups (e.g., perform safety briefings via individual study, small-group briefings)
 - Prepositioning of responders
 - Using increased artificialities and simulations as needed to improve margin of safety to protect against spread of COVID-19 and its variants.

Implementation of Annual FOF Exercises during CY 2022

- NRC understands that during the COVID-19 PHE licensees may need to implement a FOF exercise program that contains increased simulations and artificialities on a temporary basis.
- NRC further expects that once the **PHE has ended or conditions support a safe training environment** that any additional simulations and artificialities added due to COVID-19 will be removed to ensure the licensee's exercise program replicates actual plant conditions and to eliminate any unnecessary simulations and artificialities.

Documentation of Annual FOF Exercises during CY 2022

- Licensees must ensure that they appropriately document, in their planning base, the basis for implementing increased simulations and artificialities in their annual exercises.
- NRC shall inspect this documentation to ensure the licensee continues to meet the annual exercise requirements for the security response organization.

Questions