

# SRM-COMSECY-19-0006

## Implementation Plan

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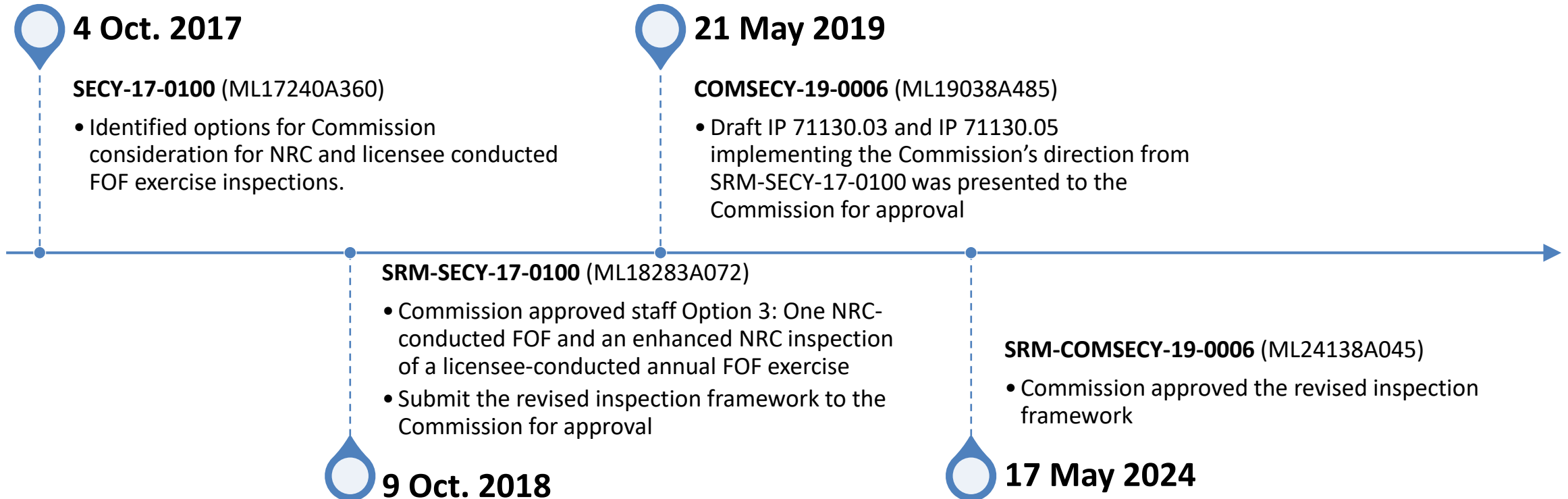
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# Agenda

- Milestones re. COMSECY-19-0006
- Force-on-force (FOF) inspection program
- Inspection Procedure (IP) 71130.03 and IP 71130.05 Review and Revision
- Implementation Timeline
- Additional Considerations
- Open discussion and questions

# Milestones re. COMSECY-19-0006



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# Force-on-Force Inspection Program

- Currently Implemented Inspection Framework
  - **2** NRC-conducted FOF exercises at each site triennially (IP 71130.03).
  - Triennial observation of **1** licensee conducted annual FOF exercise (IP 71130.05).
    - Focused on verification of licensee identification and correction of deficiencies.
- SRM Approved Inspection Framework
  - **1** NRC-conducted FOF exercise at each site triennially (IP 71130.03).
  - Enhanced inspection of **1** licensee conducted annual FOF exercise triennially (IP 71130.05).
    - Will include evaluation of the performance of the licensee adversary force and the development of the exercise scenario.

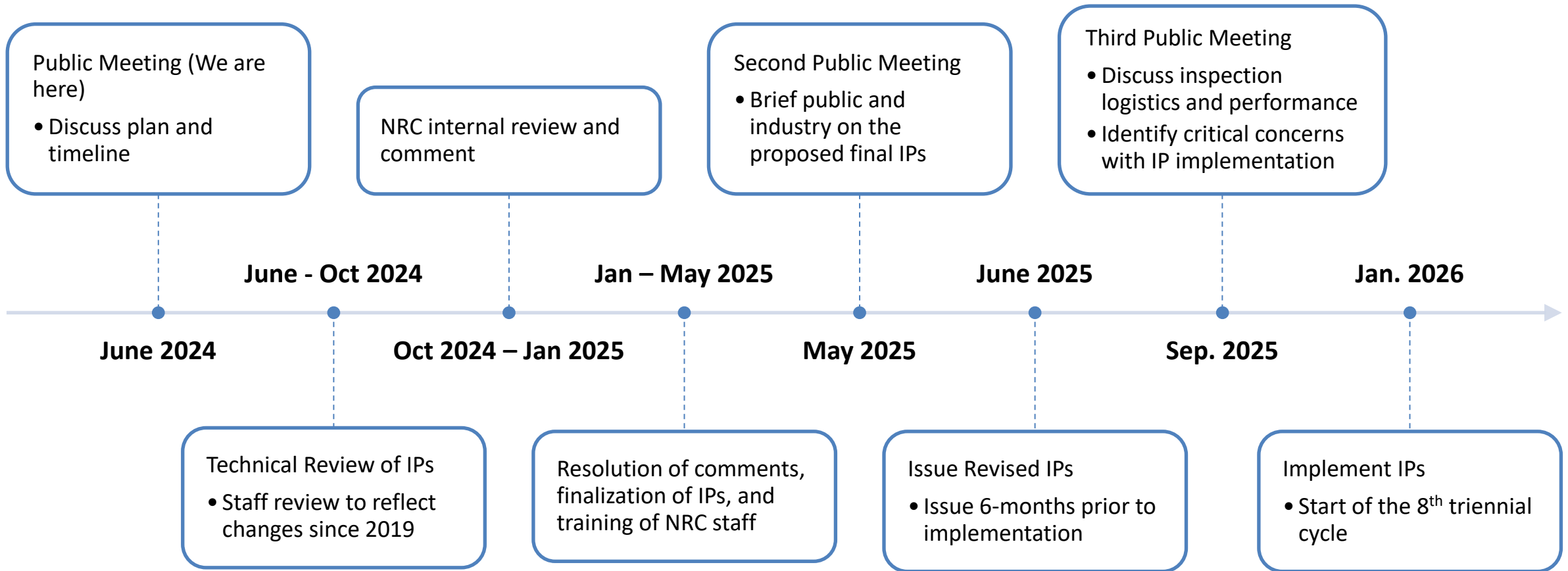
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- IP 71130.03, “Contingency Response – Force-on-Force Testing” (IP is OUO-SRI)
  - IP 71130.05, “Protective Strategy Evaluation and Performance Evaluation Program” (IP is OUO-SRI)

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# IP 71130.03 and IP 71130.05 Review and Revision

- COMSECY-19-0006 included draft revisions of IP 71130.03 and IP 71130.05
  - SRM-COMSECY-19-0006 directed staff to take “into account intervening changes to the inspection procedures...”
- Staff will assess IPs to ensure alignment with regulatory requirements.
- Staff will revise IPs to improve guidance related to the evaluation of scenario planning and adversary performance.
- Validate the resource estimate for both IPs.
- Reflect IP format and structure changes since 2019 consistent with IMC 0040.

# Implementation Timeline



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# Additional Considerations

- The COVID-19 Public Health Emergency
  - Lessons learned as a result of modifications to the FOF inspection program in response to protective health measures.
- Inspection of licensee MILES equipment in IP 71130.05
  - COMSECY version of IP 71130.05 contained inspection guidance for licensee MILES. Staff will review this guidance and verify the appropriate regulatory basis.
- Industry identified plans and challenges for implementation

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# Open Discussion and Questions

- Key Message:
  - Staff will revise IP 71130.03 and IP 71130.05 per Commission direction in SRM-COMSECY-19-0006.
  - Implementation is planned for January 2026 to coincide with the start of the next triennial inspection schedule.
  - Multiple opportunities for public engagement are planned.
  - Please identify and relay any questions, concerns, or anticipated challenges.

## Questions?

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