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# (U) NRC INSPECTION MANUAL

NSIR/DSO

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## (U) INSPECTION PROCEDURE 71130.05

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### (U) PROTECTIVE STRATEGY EVALUATION AND PERFORMANCE EVALUATION PROGRAM

(U) Effective Date: January 1, 2026

#### (U) PROGRAM APPLICABILITY: IMC 2201 A

#### 71130.05-01 (U) INSPECTION OBJECTIVES

- 01.01 (U) To verify and assess the licensee's implementation of its protective strategy in accordance with the U.S. Nuclear Regulatory Commission (NRC)-approved security plans, regulatory requirements, and any other applicable requirements.
- 01.02 (U) To verify and assess the licensee's protective strategy to ensure that it has been appropriately developed, is being effectively implemented, and designed to meet the general performance objective of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55(b).
- 01.03 (U) To verify that the licensee has developed, implemented, and is maintaining a performance evaluation program (PEP) that describes and demonstrates assessment of the effectiveness of the onsite physical protection program and protective strategy.
- 01.04 (U) To evaluate the adequacy of the licensee's conduct of the annual force-on-force (FOF) exercises and assessment of performance via the critique process in order to identify and correct deficiencies of the onsite physical protection program and protective strategy.
- 01.05 (U) To evaluate the licensee's ability to implement a PEP that supports its assessment of the effectiveness of the onsite physical protection program and protective strategy.
- 01.06 (U) To verify that the licensee's physical protection program associated with this sample is designed and implemented to meet the general performance objective of 10 CFR 73.55(b).

#### 71130.05-02 (U) INSPECTION REQUIREMENTS

##### (U) General Guidance

(U) Through verification of the inspection requirements within this inspection procedure, inspector(s) ensure that the licensee's physical protection program associated with this sample is designed and implemented to meet the general performance objective of 10 CFR 73.55(b).

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(U) To the extent practicable, inspector(s) should ensure that the samples associated with this inspection procedure are completed during the off years of the 71130.03, "Contingency Response – Force-on-Force Testing," inspection procedure. Where this scheduling recommendation cannot be met, the timeframe for the conduct of this inspection activity is left to the discretion of regional management.

(U) In preparing to complete this procedure, the inspector(s) should familiarize themselves with relevant documentation which may include, but is not limited to, the licensee's NRC-approved security plans and site-specific and/or corporate procedures. Specifically, the inspector should apply additional attention to recent security plan changes that could be relevant to the inspection activity.

(U) The guidance within this procedure is being provided as a tool which: (1) recommends to inspectors certain methods and techniques for determining licensee security program compliance and effectiveness related to an inspection requirement or; (2) clarifies certain aspects of a regulatory requirement associated with a particular inspection requirement. Where minimum sampling numbers are indicated (i.e., at least three intrusion detection system (IDS) zones shall be tested, or at least 20 percent of the total personnel on a shift will be selected for weapons firing etc.), inspectors should adhere as closely as possible to the numbers identified in the guidance. Inspectors may expand the minimum number to aid in determining the extent of the condition, should compliance concerns arise. Completion of other recommended actions contained in this guidance should not be viewed as mandatory and are only intended to assist the inspector(s) in determining whether an inspection requirement has been adequately addressed. Should questions arise regarding procedural requirements or guidance, inspectors should consult with regional management or the Office Nuclear Security and Incident Response (NSIR), the program office, for clarification.

(U) The inspector(s) should coordinate the conduct of the inspection with the licensee's staff before the inspection. Key areas of coordination would be scheduling the days and times to conduct the protective strategy overview/briefing, and any necessary tours of the owner-controlled area (OCA), protected area (PA) and vital areas (VAs). The tours should be limited to only that which are necessary to complete the inspection requirements identified in this IP. General protective strategy tours are performed during IP 71130.03 and should not be duplicated.

(U) Inspection element 02.04.c should be performed approximately 3 weeks before the onsite portion of the inspection. The inspector(s) should request a copy of the licensee's scenario for the FOF exercise and assess it for adequacy in accordance with the guidance contained in Section 02.04.c. Any comments related to exercise adequacy should be forwarded to the licensee for resolution as soon as practicable prior to the onsite inspection week to give the licensee adequate time to modify the scenario and address any concerns.

(U) One hour has been allocated within the resource estimate of this inspection procedure (IP) for the inspector(s) to conduct physical protection program status verifications. The purpose of the status verification is to ensure that the implementation of the licensee's physical protection program is maintained in accordance with regulations, licensee security plans, and implementing procedures. The inspector(s) should conduct observations of physical protection program elements other than those inspected within this procedure.

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(U) TIER I

02.01 (U) Protective Strategy Assessment

(U) For this portion of the inspection, the inspector(s) should review the licensee's documented physical security plan (PSP), safeguards contingency plan, protective strategy, and relevant implementing procedures. The inspector(s) should also request that the licensee provide a protective strategy overview/briefing that addresses its protective strategy and all supporting physical protection measures and security equipment that the licensee employs in support of its protective strategy from the outermost layer of defense working inward to the identified target sets. The review and briefing will provide detailed insights pertaining to the design of the licensee's protective strategy and should support the completion of the inspection requirements within this section.

(U) The review conducted by the inspector(s) and the protective strategy overview/briefing provided by the licensee should provide the inspector(s) with an understanding of: (1) the basis for the licensee's protective strategy; (2) how the licensee has considered elements of the design basis threat (DBT) within the design of its strategy; and (3) how the licensee implements its protective strategy. During the protective strategy overview/briefing, the inspector(s) should focus on ascertaining specific detail and conceptual validity of the aspects described by the licensee through inquiry.

- a. (U) **Verify that the licensee has documented the number of armed responders (ARs) it has determined are required to satisfy the design requirements of 10 CFR 73.55(b), and the number of armed security officers (ASOs) it has designated to strengthen the onsite response capabilities in security plans. (10 CFR 73.55(k)(5) and 10 CFR 73.55(k)(6))**

(U) Specific Guidance

(U) When inspecting this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to verify that the licensee has documented the number of ARs and ASOs it has established to implement its protective strategy within these plans as required. The inspector(s) should also ensure that the numbers identified in the security plans match the numbers provided by the licensee during the protective strategy overview/brief.

- b. (U) **Verify that the licensee's protective strategy is designed to protect systems and components that have been identified as target set equipment against the DBT of radiological sabotage. (10 CFR 73.55(b)(4) and 10 CFR Part 73, Appendix C, Section II, B.3.c.(v))**

(U) Specific Guidance

(U) To inspect this requirement, the inspector(s) should review the licensee's protective strategy paying particular attention to the response locations, areas of responsibility, and target set equipment locations identified within this document. The inspector(s) should also request that the licensee provide a document that depicts the fields of fire for each response location.

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(OUO-SR) REDACTED

- c. (U) Verify that the licensee's protective strategy includes established response timelines that ensure the response force's ability to interdict and neutralize the threat in accordance with 10 CFR 73.55 and 10 CFR Part 73 Appendix C, Section II and the licensee's Safeguards Contingency Plan. (10 CFR 73.55(k)(8)(ii) and 10 CFR Part 73, Appendix C, Section II, B.3.c.(v)(2))

(U) Specific Guidance

(U) To inspect this requirement, inspectors should review the licensee's PSP to identify the number of ARs and ASOs committed to in the site PSP that comprise the licensee's armed response team. The inspectors will then review the contingency response plan and verify the licensee has provided timelines for all ARs. Following verification of all armed response timelines, the inspector will then review the ASO positions identified in the site's contingency response plan and verify that ASOs who are required to augment the armed response team and respond to a designated position or location have an assigned timeline. These aforementioned members of the armed response team are required to have specified timelines consistent with the regulatory requirement in 10 CFR 73.55(k)(4). In addition, inspectors will review the licensee's contingency response plan and other supporting documents to verify that ASOs who respond as directed to strengthen the onsite response capabilities but have no designated response position or location are identified; however, no timeline is required for these ASO positions. The inspector should ensure that responders with assigned timelines are capable of interdicting the adversary prior to the adversary advancing beyond the interdiction capability of the assigned AR. Specifically, the inspector should ensure that the physical protection program has been developed with established timelines that support adversary interdiction.

(OUO-SR) REDACTED

(U) When verifying the methodology that the licensee used to establish its response timelines, the inspector(s) should ensure that the following factors were considered:

1. (U) the distance from the responder starting/staging location or furthest point of the responder's tour/area of responsibility to the response location/defensive position, whichever is more challenging;
2. (U) the time it takes to obtain readily available weapons and equipment if responders are not required to carry this equipment;
3. (U) the time to perform any actions, that are credited measures of defense-in-depth, in support of the protective strategy (e.g., deployment of grenade netting, deployment and securing of additional physical barriers, etc.);
4. (U) the standard rate of travel (usually derived in feet per second) for responders carrying a full complement of weapon and contingency equipment;

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5. (U) the standard rate of travel (usually derived in feet per second) for adversaries carrying a full complement of equipment as outlined in Regulatory Guide (RG) 5.69, "Guidance for the Application of the Radiological Sabotage Design Basis Threat in the Design, Development and Implementation of a Physical Protection Program That Meets 10 CFR 73.55 Requirements";
6. (U) the delays associated with the barriers that are identified as a component of the licensee's protective strategy; and
7. (U) that the response is initiated by detection and assessment at the respective perimeter barrier (which the licensee has specifically identified as the point of initiation for their protective strategy) prior to the completed breach.

(U) When validating timelines, inspector(s) should identify the point of detection and assessment which initiates the licensee's protective strategy from which the timelines were established. Timelines can be derived using calculations or through the actual performance of timeline drills conducted using various ARs that provide a reasonable representation of the response force to obtain an average response time.

(U) The inspector(s) should also verify that the licensee has developed its timelines using a methodology that considers these factors to ensure the timelines provide the response force sufficient ability to interdict and neutralize the adversary in accordance with 10 CFR 73.55, 10 CFR Part 73 Appendix C, [Section II](#), and the licensee's safeguards contingency plan. For additional guidance on physical barrier delays see Regulatory Issue Summary 2003-06, "High Security Protected and Vital Area Barrier/Equipment Penetration Manual," and NUREG/CR-7145, "Nuclear Power Plant Security Assessment Guide."

(U) Inspectors should refer to memoranda "Inspection Update Related to Contingency Response Timelines," dated October 30, 2018 (ML18236A535 (non-public)), for additional guidance related to AR and ASO timeline development and implementation.

- d. **(U) Verify that the licensee's protective strategy, as implemented, is designed to protect against characteristics, including tactics, of the external attacking force in accordance with the DBT of radiological sabotage. (10 CFR 73.1, 10 CFR Part 73, [Appendix B](#), Section VI, G., and 10 CFR Part 73, [Appendix C](#), Section II, B.3.c.(v))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to ensure the licensee's strategy contains measures to counter or account for the characteristics and tactics of the external attacking force as described in 10 CFR 73.1(a)(1) and RG 5.69.

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(U) The inspector(s) should verify that the licensee's protective strategy is designed to include and implement measures such as appropriate OCA surveillance and observation; physical barriers in the OCA for land and waterborne vehicle bomb assault; search measures at all access control points designed for authorized access (OCA and PA); channeling barriers for vehicles; PA perimeter barrier systems; isolation zones; PA perimeter intrusion detection and assessment systems; illumination and/or low light technology used to enhance assessment, interdiction, and neutralization; other physical barriers used for delay; response positions located throughout the PA that address all avenues of approach from the external perimeter as well as leading to target sets; command and control to ensure effective use of the response force; etc. This inspection requirement is intended to verify the protective strategy design only.

- e. (U) **Verify that the licensee's protective strategy, as implemented, is designed to protect against the weapons described in the DBT of radiological sabotage. (10 CFR 73.1, and 10 CFR Part 73, Appendix C, Section II, B.3.c.(v))**

(U) Specific Guidance

(~~OUO-SRI~~) REDACTED

- f. (U) **Verify that the licensee's protective strategy, as implemented, is designed to protect against the equipment, tools, and incapacitating agents described in the DBT of radiological sabotage. (10 CFR 73.1, 10 CFR 73.55(i)(3), 10 CFR Part 73, Appendix C, Section II, B.3.c.(v), and 10 CFR Part 73, Appendix B, Section VI, G.2.(b))**

(U) Specific Guidance

(U) When inspecting this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to ensure the licensee's strategy incorporates the use of security systems, equipment, and measures that provide protection against use of equipment, tools, and incapacitating agents by an adversary as identified in RG 5.69. The inspector(s) should verify that the licensee's protective strategy is designed to incorporate surveillance activities and IDS and assessment systems (surveillance frequency, tamper indicating, and self-checking system design, etc.) that account for the use of equipment and tools as identified in the DBT of radiological sabotage.

(U) The inspector(s) should also verify that the licensee implements the use of equipment (i.e., gas masks, etc.) to protect response force personnel from the use of incapacitating agents and that the licensee's implementation (i.e., donning) of this equipment is based on practical application that is consistent with the manufacturers' recommendations to ensure equipment effectiveness and the survivability of the individual.

- g. (U) **Verify that the licensee's protective strategy, as implemented, is designed to protect against the land vehicles described in the DBT of radiological sabotage. (10 CFR 73.1, and 10 CFR 73.55(e)(3))**

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(U) Specific Guidance

(U) When inspecting this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to ensure the licensee's physical protection program and protective strategy includes the use of vehicle control measures such as physical barriers in accordance with its site-specific analysis to protect against the use of vehicles as identified in the DBT of radiological sabotage. The inspector(s) should verify that the licensee has addressed the use of vehicles in the design of its physical protection program and protective strategy by employing physical barriers that deter, delay and channel vehicles to areas such as access control points that enable the licensee to control these vehicles and the personnel they may carry.

- h. **(U) Verify that the licensee's protective strategy, as implemented, is designed to protect against the insider threat described in the DBT of radiological sabotage. (10 CFR 73.1, and 10 CFR 73.55(b)(9))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, insider mitigation program, and associated implementing procedures to ensure the licensee's physical protection program and protective strategy are designed to incorporate measures that protect against insider activity which is outlined in the DBT of radiological sabotage. The inspector(s) should verify that the security force:

1. (U) conducts periodic patrols of exterior areas of the PA to include physical barriers and VA portals,
  2. (U) conducts periodic patrols of VAs,
  3. (U) conducts random patrols of target set equipment,
  4. (U) is trained to recognize obvious indications of tampering,
  5. (U) initiates a response in accordance with the licensee's security plans upon detection of tampering,
  6. (U) conducts OCA vehicle searches (if applicable) in accordance with regulations, licensee security plans, and implementing procedures.
- i. **(U) Verify that the licensee's protective strategy, as implemented, is designed to protect personnel, equipment, and systems necessary to prevent significant core damage and spent fuel sabotage against the effects of a vehicle bomb assault in accordance with the DBT of radiological sabotage. (10 CFR 73.1, and 10 CFR 73.55(e)(10)(i)(A))**

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(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to ensure the licensee's physical protection program and protective strategy is designed to include the implementation of a vehicle barrier system for the protection of vehicle bomb assaults as outlined in RG 5.69.

(U) The inspector(s) should also verify through inquiry that the licensee used the guidance in NUREG/CR-6190, "Protection Against Malevolent Use of Vehicles at Nuclear Power Plants," regarding standoff distances or the distances determined via a site-specific analysis when developing its protective strategy and determining the location for its vehicle barrier system(s). The inspector should also verify that the vehicle search measures implemented at vehicle access control points prevent the introduction of explosive devices consistent with the intended function of the physical barrier.

- j. **(U) Verify that the licensee's protective strategy, as implemented, is designed to protect against a waterborne vehicle bomb assault in accordance with the DBT of radiological sabotage. (10 CFR 73.1, and 10 CFR 73.55(e)(10)(ii))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to ensure that the licensee has designed the physical protection program and protective strategy with consideration of physical protection measures that restrict waterborne vehicle access to and provide periodic surveillance and observation of waterway approaches.

(U) The inspector(s) should verify through inquiry the type of physical protection measures the licensee has implemented to protect against waterborne vehicles in accordance with the DBT of radiological sabotage as outlined in RG 5.69. If physical barrier systems have been implemented to protect against a waterborne vehicle bomb threat, the inspector(s) should verify through inquiry that the licensee used the guidance in NUREG/CR-6190, regarding standoff distances or the distances determined via the site-specific analysis when determining the location for its waterborne vehicle barrier system(s).

- k. **(U) Verify that the licensee's protective strategy includes notification to law enforcement agencies (local, State, Federal, etc.) in accordance with site procedures. (10 CFR 73.55(k)(8)(iii))**

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(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee PSP and safeguards contingency plan to determine that the licensee has made liaison with law enforcement agencies (local, State, Federal) in its area. The inspector(s) should verify through inquiry that the licensee has established a liaison with law enforcement agencies to provide assistance for contingency events. The level of support from law enforcement will be dependent on the law enforcement agency's willingness to provide support and the resources it has available. Though the NRC requires licensees to establish and document liaison with law enforcement agencies, the NRC does not possess regulatory or jurisdictional authority over law enforcement agencies and cannot mandate their support or level of support.

02.02 (U) Components of the Protective Strategy

(U) For this portion of the inspection, the inspector(s) should physically verify, through observation, the implementation of the response force, physical protection measures, and security equipment that the licensee has identified as components of the protective strategy in its PSP plans, implementing procedures, and its protective strategy overview/briefing. While conducting the observations, the inspector should assess the components of the protective strategy and how they are implemented to verify the ability of the components to perform their intended function as stated by the licensee.

(U) This portion of the inspection focuses on the physical verification of all components that the licensee has identified in its PSP, safeguards contingency plan, protective strategy, and implementing procedures that the licensee uses to implement its protective strategy and that support protective strategy implementation.

- a. **(U) Verify that the physical barriers the licensee employs provide deterrence, delay or support access control and the effective implementation of the protective strategy. (10 CFR 73.55(e)(3)(ii) and 10 CFR 73.55(e)(3)(iii))**

(U) Specific Guidance

(U) During the conduct of OCA and PA tours, the inspector(s) should observe the physical barriers (channeling barriers, nuisance fence, delay fencing, concertina wire, doors, turnstiles, etc.) that the licensee uses to support the implementation of its physical protection program and protective strategy to verify that these barriers are located in accordance with the licensee's security plans and protective strategy overview/briefing and that they provide the function and delay intended by the licensee.

- b. **(U) Verify that a single act, in accordance with the DBT of radiological sabotage, cannot remove the capabilities of both alarm stations to detect and assess alarms, initiate and coordinate an adequate response to alarms, summon offsite assistance, and provide command and control. (10 CFR 73.55(i)(4)(i))**

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(U) Specific Guidance

(U) The functions that must be maintained within either alarm station after a single act are:

1. (U) detection and assessment of alarms,
2. (U) initiation and coordination of an adequate response to alarms,
3. (U) summoning offsite assistance,
4. (U) providing effective command and control.

(U) A single act does not refer to the number of acts committed during a security contingency event; rather it pertains to any one act that alone could remove the licensee's capability to retain at least one alarm station and/or its functions as required (74 FR 13943).

(U) The inspector(s) should interview appropriate licensee personnel who are familiar with the central alarm station (CAS), secondary alarm station (SAS) and perimeter IDS and assessment systems design. The inspector(s) should determine through inquiry that the CAS, SAS and the perimeter IDS and assessment systems have no single junction (single-point vulnerability) or the location where these junctions exist.

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(U) The review of the licensee's protective strategy should determine whether the licensee has specifically accounted for this area with physical protection measures and that the measures would enable the protective strategy to be initiated without loss of this single-point vulnerability. If the review determines that this junction is specifically accounted for within the protective strategy, this inspection requirement has been satisfied.

- c. **(U) Verify that the licensee maintains the appropriate number of ARs available at all times inside the PA (may include the PA access control point) within the specified predetermined timelines per the licensee's security plans and safeguards contingency plan. (10 CFR 73.55(k)(4), 10 CFR 73.55(k)(5) and 10 CFR Part 73, Appendix C, Section II, B.3.c.(iv))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should conduct a verification to ensure that the security force members who are designated as ARs for the on-shift security force are staffed to the documented number; are in the PA (may include the PA main access control point) within their areas of responsibility and their predetermined timelines; and are provided with required weapons and contingency equipment within their possession or are readily available in accordance with the licensee's PSP, safeguards contingency plan, and the licensee's protective strategy.

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- d. **(U) Verify that ARs are not assigned other duties or responsibilities that could interfere with their assigned response duties. (10 CFR 73.55(k)(5)(iii))**

(U) Specific Guidance

(U) The inspector(s) should verify that the security force members that are designated as ARs for the on-shift security force are not performing duties that would interfere with their armed response duties. ARs may conduct walk-downs of their areas of responsibility within their timelines; they may perform patrols of VAs within their area of responsibility and timelines; they may perform patrols of areas that contain target set equipment that is within their area of responsibility and timeline; etc. ARs should not perform duties outside of their area of responsibility and timeline and should not be assigned to any post that could not be left during a contingency event or that could make them susceptible to small arms fire in external areas of the PA without protection.

- e. **(U) Verify, through observation of armed response personnel performing a timeline response drill, a sample of responder timelines. (10 CFR 73.55(k)(4), 10 CFR Part 73, Appendix C, Section II, B.3.c.(v)(2))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) may choose to verify timelines during the conduct of the licensee exercises or may select a sample of the ARs who are on-shift (no more than three) to demonstrate their specific assigned response timeline. The inspector(s) should ensure that the responders staging or starting location, weapon(s), and equipment configuration are consistent with their daily operations (i.e., in ready room, at a pre-selected position in the officer's patrol path, seated, with equipment either in their possession or in a readily available location, etc., in accordance with the licensee's PSP, safeguards contingency plan, and protective strategy).

(U) The inspector(s) should request that a licensee security force evaluator facilitate the drill to include establishing required preliminary safety measures (i.e., posting support personnel along the route of travel, outfitting the responders with helmet, knee and elbow pads, etc., in accordance with licensee safety procedures). For the conduct of the drill, the inspector(s) should observe the responder from starting location to the response location keeping time with a timepiece. The inspector(s) should verify that the response timeline for each of the selected positions provides the responder the ability to arrive at their response location with all required weapons and contingency equipment and within the specified time as outlined in the licensee's security plans, safeguards contingency plan and protective strategy.

- f. **(U) Verify that the licensee has provided the firearms, ammunition, and equipment necessary to implement the protective strategy to ARs and ASOs designated to strengthen the onsite response capabilities and that this equipment is of sufficient supply, is in working condition, and is readily available. (10 CFR 73.55(k)(2))**

(U) Specific Guidance

(U) No inspection guidance.

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02.03 (U) Protective Strategy Evaluation

- a. (U) Verify that the licensee's protective strategy provides a basis of information that demonstrates that the protective strategy was designed to effectively interdict and neutralize the threats up to, and including, the DBT of radiological sabotage as defined in 10 CFR 73.1, to prevent significant core damage and radiological sabotage. (10 CFR 73.55(k)(1) and 10 CFR Part 73, Appendix C, Section II, B.3.c.(v))

(U) Specific Guidance

(U) For this portion of the inspection, the inspector(s), after receiving the protective strategy overview/briefing and verifying the inspection requirements within the "Components of the Protective Strategy" section of this procedure, may request the performance demonstration of the protective strategy through the conduct of tabletop drills. The inspector(s) should select the target from the licensee-provided target sets and should then provide the licensee with a scenario for the drill. In developing the scenario, the inspector(s) should consider potential weaknesses identified during this inspection effort. After providing the necessary input, the inspector(s) should assess elements of the protective strategy while conducting the tabletop drills. The inspector(s) should assess the following:

1. (U) responder assignments and re-directions,
2. (U) response routes,
3. (U) response timeliness,
4. (U) protected positions,
5. (U) fields of fire,
6. (U) command and control,
7. (U) contingency weapons and equipment,
8. (U) alarm assessment,
9. (U) physical barrier integrity,
10. (U) delays provided by physical barriers,
11. (U) task time for adversary actions,
12. (U) other protective measures and security equipment that the licensee has identified as a component of its protective strategy per the PSP and implementing procedures.

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02.04 (U) Performance Evaluation Program

- a. (U) **Verify that the licensee has developed, implemented, and is maintaining a PEP that is documented in procedures which describes how the licensee will demonstrate and assess the effectiveness of its onsite physical protection program and protective strategy through tactical response drills and FOF exercises. (10 CFR Part 73, Appendix B, Section VI, C.3.(a))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, implementing procedures, and associated training documentation to verify that the licensee has established measures to implement and maintain a PEP that is documented and describes how the licensee will demonstrate and assess the effectiveness of its onsite physical protection program and protective strategy through tactical response drills and FOF exercises. The PEP shall be referenced in the site's training and qualification plan and include procedures for the conduct of tactical response drills and FOF exercises designed to demonstrate and assess the effectiveness of the licensee's PSP, protective strategy, and contingency event response by all individuals with responsibilities for implementing the safeguards contingency plan.

(U) The inspector(s) should determine that the conduct of the exercise supports that the licensee is capable of implementing its PEP. If the inspector(s) determine that the exercise did not support the assessment and evaluation of the licensee's protective strategy, the inspector(s) should determine what aspect of the licensee's PEP was deficient. Some determining factors to consider:

1. (U) Substandard training for licensee adversaries which resulted in a scenario that did not challenge the response team capabilities;
2. (U) Potential adversary tactics were underutilized;
3. (U) Controllers failed to provide timely communications to exercise players;
4. (U) Controllers failed to make timely decisions (neutralizing players or allowing players to continue) following engagements involving false cover;
5. (U) Licensee failed to reduce the number or magnitude of artificialities (e.g., excessive timeouts used); or;
6. (U) Licensee systems and equipment used for FOF exercises did not provide adequate controls (radio system performance, Multiple Integrated Laser Engagement System (MILES) gear performance, ineffective use of bomb cards (generating simulated alarms for SAS and or CAS response)).

- b. (U) Verify that the licensee has developed, implemented, and is maintaining a maintenance, testing, calibration, and training program for MILES equipment that is used in the performance of licensee conducted FOF exercises. (10 CFR 73.55(n)(1)(i) and 10 CFR Part 73, Appendix B, Section VI, C.3.(k)(3))**

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(U) Specific Guidance

(U) MILES gear is relied upon as the primary means to provide accurate data and conclusive results in the portrayal of firearms engagements during FOF exercises. The inspector(s) should evaluate the methodologies implemented by the licensee to ensure that the MILES equipment used in licensee-conducted exercises performs as intended and that MILES implementation, maintenance, and calibration is consistent with manufacturer's specifications. When inspecting licensee MILES protocols, inspector(s) should review, evaluate and as applicable observe the following:

1. (U) A sample (no more than six exercises) of prior FOF exercise after action documentation (including MILES reports) to identify potential MILES performance issues or trends.
2. (U) Licensee corrective actions over the last 3 years related to MILES including the status and proposed or final resolution.
3. (U) Training provided to exercise participants (MILES users) and exercise controllers.
4. (U) Licensee procedures and processes for maintenance, testing, and calibration of the MILES equipment.
5. (U) Documentation of completed MILES maintenance, testing, and calibration over the last 3 years.
6. (U) Licensee MILES testing protocols implemented prior to FOF exercises.
7. (U) MILES reports generated for the FOF exercise conducted during the inspection.
8. (U) Any MILES malfunction validation test firing or harness/headset testing for the FOF exercise conducted during the inspection.
9. (U) Post exercise "hot wash" for exercise participants and mock adversary force (MAF) for MILES-related issues, deficiencies, or failures.
10. (U) MILES-related corrective actions generated for the FOF exercise conducted during the inspection.

(U) The inspector(s) should consider conducting interviews with exercise participants and exercise controllers to obtain insights regarding MILES implementation, issues experienced during exercises, and any previous MILES issues experienced during exercises as well as resolutions implemented.

- c. (U) Verify the licensee's exercise scenario for the NRC-observed licensee-conducted FOF exercise is designed to challenge the site protective strategy against elements of the DBT; minimizes the number and effects of artificialities; and provides a credible and realistic challenge to the protective strategy. (10 CFR Part 73, Appendix B, Section VI, C.3(d), C.3(k)(2), and C.3(k)(4))**

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(U) Specific Guidance

(U) Approximately 3 weeks prior to the onsite inspection, review the licensee's scenario for the FOF exercise that will be conducted during the onsite inspection week. The exercise should be reflective of the DBT of radiological sabotage and constructed to challenge the licensee's protective strategy.

(U) The inspector(s) should review the scenario to identify MAF equipment, tactics, and strategy to verify that the scenario is reflective of the DBT capability. Additionally, the inspector(s) should evaluate any identified simulations and artificialities to verify adverse effect on the exercise is avoided to the extent practicable. Finally, the inspector(s) should assess whether the scenario includes identification of attractive target sets and advantageous methods of destruction; potential routes and pathways to target sets; security systems, barriers, patrols, and response personnel which must be bypassed or negotiated; and applicable adversary composition, characteristics, tactics, techniques, tools, and procedures to employ against responders and target sets. Additional considerations can be found in Addendum 2 of IP 71130.03.

(U) If the inspector(s) identify concerns that the scenario is not reflective of attributes of the DBT or is sufficiently challenging to the licensee's protective strategy, the inspector(s) should raise the concerns to the responsible licensee personnel to discuss the characteristics and objectives of the exercise. The inspector(s) should discuss any concerns with the licensee as soon as possible to allow the licensee sufficient time to revise the scenario, if necessary. Inspector(s) should be mindful of information protection during scenario discussions with the licensee. If discussions take place over the phone or via nonsecure email the inspector(s) should make sure that safeguards information is not disclosed.

(OUO-SRI) REDACTED

**b.d.** (U) Verify, through observation of a licensee FOF exercise, that the licensee conducts FOF exercises in accordance with the licensee's PSP, protective strategy, and implementing procedures. (10 CFR Part 73, Appendix B, Section VI, C.3.(c))

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, implementing procedures, exercise scenario, controller matrix, and associated training documentation to verify that the licensee has established measures to conduct tactical response drills and FOF exercises in accordance with licensee's PSP, protective strategy, and implementing procedures.

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(U) During the licensee's FOF exercise, the inspector(s) should be in a position to directly observe and assess player, adversary, and controller performance. At a minimum, one inspector should be in position to directly observe the adversaries and controller actions and performance. One additional inspector should be in position to directly observe a player and controller actions and performance. The inspector(s) should be flexible and try to observe as much player, adversary, and controller performance as possible. As adversaries are neutralized, the inspector should make best efforts to continue to observe the remaining adversary force until the last adversary is neutralized. If adversaries advance past a player, the inspector(s) should consider relocating to an area where they can observe other players and controllers. Inspector(s) should use good judgment when relocating and consider waiting until there is a timeout to move positions. The inspector(s) need to be mindful while relocating as to not flag the area to other players or adversaries.

(U) If the inspector(s) observes deficient performance by any group or individual, the inspector(s) should not share those observations or findings with the licensee until after the licensee's post-exercise critique is complete and documented. Any inspector-observed deficiencies, observations, or findings that are not identified by the licensee in the documented post-exercise critique must be shared with the licensee and assessed in accordance with IMC 0612, Appendix B, "Issue Screening Directions," as appropriate. Licensee self-identification of deficiencies during drills and exercises is a necessary component of the PEP and failure to identify deficiencies at an appropriate threshold can negatively impact the effectiveness of the PEP and physical protection program.

e. (U) Verify that the licensee uses a MAF during tactical response drills and FOF exercises that replicate, as closely as possible, the adversary characteristics and capabilities of the DBT described in 10 CFR 73.1 (a)(1), and is capable of exploiting and challenging the site's security program. (10 CFR Part 73, Appendix B, Section VI, C.3.(I)(2))

(U) Specific Guidance.

(U) The performance of the licensee's MAF is a key factor in creating an FOF exercise environment that simulates, as closely as practicable, the specific conditions under which security personnel are required to perform assigned duties and responsibilities. MAF performance standards help ensure that MAF performance is credible, and members are sufficiently well-trained so that challenges are realistic and provide means for effective evaluation of a licensee's contingency response performance capabilities during a licensee-conducted FOF exercise.

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(U) For the inspection of this requirement, the inspector(s) should first gain an understanding of whom the licensee uses to perform mock adversary duties during tactical response drills and FOF exercises. Some licensees may use personnel from the licensee's own site to act as the MAF, where other licensees may use external personnel from other licensees or local law enforcement tactical response units to perform MAF duties. The licensee (who is being inspected) is responsible to ensure that the MAF used during tactical response drills and FOF exercises is capable of replicating, as closely as possible, the adversary characteristics and capabilities of the DBT as described in 10 CFR 73.1(a)(1) and RG 5.69, "Guidance for the Application of the Radiological Design-Basis-Threat in the Design, Development, and Implementation of a Physical Security Program that meets 10 CFR 73.55 Requirements."

(U) To verify the licensee employs a MAF that is capable of closely replicating the DBT, the inspector(s) should request the licensee provide its training and qualification plan for its MAF. Some methodologies that licensees may use include internal or external training programs that are intended to prepare individuals to act as adversary force members in accordance with 10 CFR 73.1(a)(1). Once the licensee's methodology is understood, the inspector(s) should then compare the methodology with the adversary characteristics described in 10 CFR 73.1(a)(1) and RG 5.69 to verify equivalency. Dependent upon personnel availability, the inspector(s) should interview MAF team members to assist in understanding the level of knowledge that the members possess. The adversary mission and controller brief prior to the exercise is a good opportunity, time permitting, to question the adversary team as a whole and assess level of understanding. Additionally, inspectors should also observe the MAF during the conduct of the exercise.

(U) Licensee adversaries that are current qualified members of the Composite Adversary Force (CAF) or the Joint Composite Adversary Force (JCAF) receive training that is validated by the NRC through separate oversight activities. The training content for these adversaries should not be reinspected during this inspection procedure. Inspectors should instead only verify that adversaries are active CAF or JCAF members and have received appropriate qualification or requalification certification.

(U) The guidance from RG 5.75 describes one method the licensee can use to meet the requirement of 10 CFR Part 73, Appendix B, Section VI, C.3.(1)(2). The inspectors should assess if the licensee MAF training and qualification program is equivalent to the following best practices:

1. (U) Demonstrate qualifications consistent with the requirements applicable to an AR as provided in Section VI of Appendix B to 10 CFR Part 73. The licensee should ensure that site-specific requirements needed to ensure individual MAF member performance or participation in site activities have been completed prior to performance or participation in any site activity.
2. (U) Demonstrate competency in individual and team tactical movement under both day and night conditions and in various environmental conditions.

3. (OUO-SRI) REDACTED

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4. (U) Understand the entire exercise scenario up to and including the DBT. This includes positioning and exercise/drill pace (timelines).
5. (U) Understand the application of the no-play area (to include radiation boundaries) and control measures.
6. (OUO-SRI) REDACTED
7. (OUO-SRI) REDACTED
8. (U) Demonstrate the tactical use of drill/exercise equipment and weapons, including their effective range and capabilities (including specialized equipment and weapons).
9. (U) Understand target identification, acquisition, and engagement by players, including rules of engagement.
10. (OUO-SRI) REDACTED
11. (U) Understand the effectiveness of body armor employed by players and its ballistic protection during the exercise.
12. (U) Understand the rapid, violent, individual and small-unit movement, maneuver, and attack characteristics.
13. (OUO-SRI) REDACTED
14. (U) Understand the use, effects, and dispersal characteristics of chemical agents and smoke grenades.
15. (OUO-SRI) REDACTED
16. (U) Understand operational planning including the analysis of a site-protective posture and in planning a mission with available resources (e.g., collusion with an insider).
17. (U) Understand the differences between the various types of insiders and how to use each type of insider effectively to obtain intelligence information and collect data.
18. (U) Understand the use of MILES equipment.
19. (U) Understand red gun equipment usage, application and safety.
20. (U) Demonstrate firearms knowledge, including safety, marksmanship, and manipulation skills with all weapons described in the DBT. Training should include a course of fire to enhance proficiency to shoot on the move and while wearing a gas mask. Firearms training should also include manipulation and malfunction-clearing techniques, fire discipline, and precision-shooting techniques.
21. (OUO-SRI) REDACTED

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(a) (OUO-SRI) REDACTED

(b) (OUO-SRI) REDACTED

(c) (OUO-SRI) REDACTED

(d) (OUO-SRI) REDACTED

(e) (OUO-SRI) REDACTED

22. (U) Understand applicable site-specific delay barriers and movement timelines.

23. (U) Understand the site's policy on the use of deadly force.

24. (U) Understand exercise and site safety procedures including procedures, guidelines and references, and the procedures for the use and control of safeguards information.

25. (U) A licensee's MAF should also possess the following FOF exercise-specific knowledge, skills, and abilities. MAF training should include site-specific information, industrial safety requirements, weapons safety requirements, radiological safety, delay barrier movement timelines and use of deadly force. It should also address the following topics:

(a) (U) drill timeline coordination (situational awareness and proper cue injects);

(b) (U) cover and concealment assessment;

(c) (U) individual and team tactical movement;

(d) (U) physical security systems and barriers;

(e) (U) any specialized equipment;

(f) (U) MILES equipment usage and safety;

(g) (U) red gun equipment usage and safety;

(h) (U) weapons/explosives capabilities and simulation methods; and

(i) (U) safety control.

**c.f. (U) Verify that the licensee documents a post-exercise critique, the scenario, and participants for all tactical response drills and annual FOF exercises. (10 CFR Part 73, Appendix B, Section VI, C.3.(g) and (h))**

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(U) Specific Guidance

(U) To inspect this requirement, the inspector(s) should review the licensee's training documentation to ensure the licensee has established measures to maintain drill and exercise documentation to include: post-exercise critique, the scenario, and participants for all tactical response drills and annual FOF exercises.

**d.g. (U) Verify that each member of each shift who is assigned duties and responsibilities required to implement the site's safeguards contingency response plan and protective strategy participates in tactical response drills and FOF exercises at the frequency prescribed in 10 CFR Part 73, Appendix B, Section VI. (10 CFR Part 73, Appendix B, Section VI, C.3.(l)(1))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's training documentation (to include a sample of individual training records) to verify that the licensee has established measures to ensure that each member of each shift, who is assigned duties and responsibilities required to implement the site's safeguards contingency plan and protective strategy participates in at least one tactical response drill quarterly and one FOF exercise annually.

(U) The triennial FOF exercise conducted by the NRC may be counted as the annual FOF exercise for the contingency response personnel involved. Individuals may participate in one of the following roles to satisfy this requirement as a player: response team leader, alarm station operator, AR, or ASO designated as a component of the protective strategy. Additionally, individuals who are trained and qualified to perform contingency duties for multiple-response team duty positions should participate as a player in drills or exercises for each position for which they are qualified. This requirement can be satisfied by participating in each position during the course of four quarterly drills and one annual exercise during the year (e.g., a security force member can serve as a response team leader in the first quarter drill, a CAS or SAS operator during the second quarter drill, and an AR in the annual exercise).

(U) The inspector(s) should reference Regulatory Guide (RG) 5.75, "Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities," to understand acceptable methods that a licensee may employ for security personnel who are unable to fulfill the annual FOF exercise participation requirement.

**e.h. (U) Verify that findings, deficiencies, and failures identified in the training program to include tactical response drills and FOF exercises that adversely affect or decrease the effectiveness of the site's protective strategy are entered into the licensee's problem identification and resolution program. (10 CFR 73.55(b)(10), 10 CFR Part 73, Appendix B, Section VI, C.3.(i))**

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(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should understand the methodology the licensee uses to disposition each deficiency identified in a drill or exercise and what mechanism(s) the licensee uses to correct those deficiencies. The inspector(s) should ensure that the licensee has established measures to handle deficiencies identified during a drill or exercise consistent with the site's problem identification and resolution, self-assessment, or training program. All deficiencies should be evaluated to ensure proper management, action, and resolution of the deficiencies. Some deficiencies (training and human performance related) may be addressed through the training program as long as the licensee's evaluation demonstrates that the deficiencies do not adversely affect or decrease the effectiveness of the protective strategy and physical protection program.

(U) Deficiencies that the licensee determines to adversely affect or decrease the effectiveness of the protective strategy and physical protection program, for example, a failure of any of the PEP key elements below, must be entered into the site's problem identification and resolution program. Specific factors of the drill, i.e., scenarios that are above DBT requirements, do not negate the requirement to document and assess findings, deficiencies, and failures that are identified during drills and exercises. Key program elements include:

1. (U) Responding with sufficient numbers of security personnel – the licensee has the required number of response personnel to effectively implement the protective strategy and protect the target sets against the DBT.
2. (U) Responding within appropriate timelines – response personnel have adequate time to reach their response positions in advance of the adversary timelines.
3. (U) Responding to protected positions – response personnel use appropriate protection and cover.
4. (U) Responding with appropriate armament – 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.
5. (U) Providing target set protection – response plan and response personnel prevent the DBT from completing sabotage of all components of any target set.

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(U) To verify that the licensee is meeting this requirement, the inspector(s) should request that the licensee provide tactical response drill or FOF exercise reports that document deficiencies. The inspector(s) should also request to review the documentation pertaining to the licensee's evaluation of the deficiencies to understand fully the licensee's method to disposition identified deficiencies and determine whether or not the deficiencies adversely affect or decrease the effectiveness of the protective strategy and physical protection program. The inspector(s) should also query site personnel ~~on the basis for determining to determine~~ how the licensee disposes deficiencies. The inspector(s) should then further request to see the associated documentation that indicates that the failure(s) were entered into the site's corrective action program and verify that the licensee evaluates, tracks, and resolves the failure(s). The NRC considers the critique process complete when all draft conclusions related to the identified weaknesses have been presented to licensee senior management, and any management questions or comments have been documented.

(U) TIER II

02.05 (U) Protective Strategy Assessment

- a. (U) **Verify that the licensee's protective strategy is designed to ensure that each alarm station is continuously staffed with at least one trained and qualified alarm station operator who is not assigned other duties and responsibilities that would interfere with the ability to execute the functions described in 10 CFR 73.55(i)(4)(i). (10 CFR 73.55(i)(4)(ii)(B))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and protective strategy to determine that the licensee has identified that both alarm stations (CAS and SAS) are continuously staffed by at least one trained and qualified alarm station operator. The inspector(s) should also verify that the assigned alarm station operators are not performing duties outside of the scope of:

1. (U) the detection and assessment of alarms,
2. (U) the initiation and coordination of an adequate response to alarms,
3. (U) the summoning of offsite assistance,
4. (U) providing effective command and control.

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(U) The assigned alarm station operators shall not be included in or respond as one of the minimum numbers of ARs and ASOs as currently outlined in the NRC-approved security plans. Assigned alarm station operators must remain within the immediate vicinity of their alarm station console (a distance that ensures their ability to perform the four functions identified above). If the alarm station operators are armed, trained and qualified with assigned weapon(s) in accordance with the NRC-approved security plans, then they may use the force continuum including the use of deadly force, in accordance with applicable State law, for defense of their alarm station console and self-defense during contingency events.

#### 02.06 (U) Components of the Protective Strategy

(U) For this portion of the inspection, the inspector(s) should physically verify, through observation, the implementation of the response force, physical protection measures, and security equipment that the licensee has identified as components of the protective strategy in security plans, implementing procedures and its protective strategy overview/briefing. While conducting the observations, the inspector should assess the components of the protective strategy and how they are implemented to verify the ability of the components to perform their intended function as stated by the licensee.

- a. **(U) Verify that the licensee implements continuous surveillance, observation, and monitoring activities in the OCA to detect and deter intruders and ensure the integrity of physical barriers or other components and functions of the onsite physical protection program. (10 CFR 73.55(i)(5)(ii))**

##### (U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should observe the conduct of OCA surveillance, observation, and monitoring by:

1. (U) observing a member of the security organization performing the OCA vehicle patrol;
2. (U) observing security force members conducting OCA patrol activities utilizing camera systems; or
3. (U) both; consistent with the OCA surveillance methodology the licensee implements.

(OUO-SRI) REDACTED

(OUO-SRI) REDACTED

- b. **(U) Verify that the licensee implements measures to restrict waterborne vehicle access to areas as identified by their site-specific analysis. (10 CFR 73.55(e)(10)(ii)(A))**

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(U) Specific Guidance

~~(OUO-SRI)~~ REDACTED

- c. (U) Verify that the licensee implements periodic surveillance and observation measures (in accordance with its site-specific analysis) of waterway approaches and adjacent areas. (10 CFR 73.55(e)(10)(ii)(B))

(U) Specific Guidance

~~(OUO-SRI)~~ REDACTED

- d. (U) Verify that the licensee employs vehicle barrier systems to protect personnel, equipment, and systems necessary to prevent significant core damage and spent fuel sabotage against the effects of the DBT of radiological sabotage land vehicle bomb assault. (10 CFR 73.55(e)(10)(i)(A))

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should verify that the licensee has utilized either the guidance in NUREG/CR-6190, regarding standoff distances or the distances determined via a site-specific analysis when developing its protective strategy and determining the location for its respective vehicle barrier system(s).

(U) The licensee's site-specific analysis must also consider and demonstrate that the other barriers (such as VA barriers) utilized to protect these assets from the DBT vehicle bomb provide assurance that these systems, components, and assets would not be compromised by the vehicle bomb. The inspector should conduct spot checks of standoff distances to verify proper vehicle barrier placement and may have to coordinate with NSIR and the U.S. Army Corps of Engineers for a review of the licensee's site-specific analysis to verify barrier placement and standoff distance.

- e. (U) Verify that the licensee has implemented protective measures (i.e., train derailer, removal of a section of track, or restrict access to railroad sidings) for areas where there is rail access to the PA and provides periodic surveillance of these protective measures. (10 CFR 73.55(e)(10)(i)(D))

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should observe the placement of train derailleurs or where the licensee has removed a section of track for train tracks that intersect the PA perimeter to verify that these measures are in place in accordance with the licensee's PSP and that they provide the level of protection intended by the licensee.

(U) The inspector should also verify that these protective measures are provided periodic observation in accordance with the licensee's PSP and implementing procedures to ensure the continued integrity and functionality of the protective measure.

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- f. **(U) Verify that unattended openings (UAOs) that intersect a security boundary (such as underground pathways) are protected by a physical barrier and are monitored by intrusion detection equipment or observed by security personnel at a frequency that prevents exploitation. (10 CFR 73.55(i)(5)(iii))**

(U) Specific Guidance

~~(OUO-SRI)~~ REDACTED

~~(OUO-SRI)~~ REDACTED

- g. **(U) Verify that openings in any physical barrier or barrier system are secured and monitored to prevent exploitation of the opening. (10 CFR 73.55(e)(4))**

(U) Specific Guidance

(U) Due to functional and operational necessity, penetrations and openings in barriers are required or may have to be made to facilitate access to the OCA, PA, and VAs for various purposes. These openings and penetrations are usually designed for access of personnel or vehicles.

(U) During the conduct of OCA and PA tours, the inspector(s) should observe the physical barriers (vehicle barriers, PA perimeter barrier, VA barriers) that the licensee uses to support the implementation of its physical protection program and protective strategy to verify that openings in these barriers are secured in a manner that provides delay consistent with the delay provided by the barrier and that these openings are monitored by intrusion detection equipment or observed at a periodicity that prevents exploitation.

- h. **(U) Verify that the licensee provides periodic surveillance and observation of vehicle barriers and barrier systems adequate to detect indications of tampering and degradation. (10 CFR 73.55(e)(10)(i)(C))**

(U) Specific Guidance

(U) Review licensee procedures to ensure these barrier systems are monitored (by physical inspection or CCTV, or both) at a frequency that will detect potential exploitation of the barrier system.

- i. **(U) Verify that the PA perimeter barrier is designed and constructed to limit access into the PA to only those personnel, vehicles, and materials required to perform official duties and support the effective implementation of the protective strategy. (10 CFR 73.55(e)(3) and 10 CFR 73.55(e)(8)(i)(A))**

(U) Specific Guidance

~~(OUO-SRI)~~ REDACTED

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- j. (U) Verify that the licensee has armed security patrols perform periodic checks of all exterior areas within the PA to include physical barriers and VA portals in accordance with its security plans and implementing procedures. (10 CFR 73.55(i)(5)(iv))

(U) Specific Guidance

(U) Security patrols of external areas of the PA shall be conducted to detect the presence of unauthorized personnel, materials, vehicles, or activities and should include observations and verifications of physical protection program equipment and measures to ensure the integrity of the equipment and the proper implementation of security measures.

- k. (U) Verify that the licensee has armed security patrols perform periodic inspections of VAs to include the physical barriers used at all VA portals in accordance with the licensee's PSP and implementing procedures. (10 CFR 73.55(i)(5)(v))

(U) Specific Guidance

(U) Armed security patrols of VAs should be conducted to ensure the integrity of physical protection program equipment and proper implementation of security measures.

(U) The integrity of vital equipment should also be observed and verified (as practicable) during these patrols.

- l. (U) Verify that the licensee performs random patrols of all accessible areas containing target set equipment in accordance with the licensee's PSP and implementing procedures. (10 CFR 73.55 (i)(5)(vi))

(U) Specific Guidance

(U) Security patrols of areas containing target set equipment should be conducted to support the prevention of unauthorized activities and should include observations and verifications of physical protection program equipment and measures to ensure integrity of equipment and proper implementation of security measures. The integrity of target set equipment should also be observed and verified (as practicable) during these patrols.

- m. (U) Verify that the licensee maintains the appropriate number of ASOs that are designated in its security plans and safeguards contingency plan to strengthen their onsite response, are onsite and available at all times to carry out assigned response duties as designated in the licensee's PSP, safeguards contingency plan, and protective strategy. (10 CFR 73.55(k)(6), and 10 CFR Part 73, Appendix C, Section II, B.3.c.)

(U) Specific Guidance

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(U) For the inspection of this requirement, the inspector(s) should conduct observations to verify that the security force members for the on-shift security force who are designated as ASOs to strengthen the licensee's onsite response are staffed to the documented number; are onsite (within the OCA), and are provided with required weapons and contingency equipment within their possession; or readily available in accordance with the licensee's security plans, safeguards contingency plan and protective strategy.

- n. **(U) Verify that the licensee provides and maintains measures that limit the exposure of security personnel to possible attack, including the incorporation of bullet-resisting protected positions that provide protection against the firearms identified in the DBT of radiological sabotage. (10 CFR 73.55(e)(3), 10 CFR Part 73, Appendix C, Section II, B.3.c.(v)(3))**

(U) Specific Guidance

(U) For the inspection of this requirement the inspector(s) should conduct a walkdown of the PA response locations to verify that these positions provide responders with the minimum protection (i.e., bullet-resisting) against the firearms of the DBT of radiological sabotage consistent with the standards identified in RG 5.76 and licensee security plans and protective strategy.

02.07 (U) Performance Evaluation Program

- a. **(U) Verify that the licensee designs and conducts tactical response drills and FOF exercises in accordance with the requirements set forth in 10 CFR Part 73, Appendix B, Section VI. (10 CFR Part 73, Appendix B, Section VI, C.3.(d), C.3.(e), C.3.(f), and C.3.(k))**

(U) Specific Guidance

(U) To inspect this requirement, the inspector(s) should review samples of drill and exercise documentation to verify that the licensee designs and conducts drills and exercises to meet the following requirements:

1. (U) Uses no more than the total number of ARs and ASOs documented in the licensee's security plans.
2. (U) Minimizes the number and effects of artificialities.
3. (U) Implements the use of systems or methodologies that simulate the realities of armed engagement (MILES gear should replicate on-duty equipment, sighting systems, weapon style, and layout) through visual and audible means and reflect the capabilities of armed personnel to neutralize a target through the use of firearms.
4. (U) Ensures that each scenario used provides a credible, realistic challenge to the protective strategy and the capabilities of the security response organization.

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- b. (U) Verify the licensee's controllers, used for tactical response drills and FOF exercises, are trained and qualified to ensure that each controller has the requisite knowledge and experience to control and evaluate exercises. (10 CFR Part 73, **Appendix B**, Section VI, C.3.(I)(4))

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should review the licensee's security plans, implementing procedures, and training documentation to verify that the licensee's exercise controllers are trained and qualified. Through this review, the inspector(s) should develop an understanding of the licensee's process for which personnel are trained and qualified to perform as controllers.

(U) Once the training and qualification process is understood, the inspector(s) should then verify through the review of lesson plans and records that personnel who perform controller duties are trained and qualified in accordance with the licensee's processes and procedures. The licensee must ensure that drill and exercise controllers are trained and qualified to ensure that each controller has the requisite knowledge and experience to control and evaluate player actions during drill or exercises in the following areas:

1. (U) response team duties,
2. (U) use-of-force,
3. (U) tactical movement,
4. (U) cover and concealment,
5. (U) defensive positions,
6. (U) fields of fire,
7. (U) re-deployment,
8. (U) communications (primary and alternate),
9. (U) use of assigned equipment,
10. (U) target sets,
11. (U) tabletop drills,
12. (U) command and control duties,
13. (U) licensee protective strategy.

(U) The inspector(s) should also conduct interviews with personnel who perform controller duties to assist in understanding the requisite knowledge and experience of the individual(s) who is/are responsible to control and evaluate exercises.

(U) Additionally, the inspector(s) should ensure controllers possess specific knowledge and experience in the implementation of controller duties during FOF exercises such as controller actions related to:

1. (U) time outs;
2. (U) providing earned information to players;
3. (U) safe drill play;
4. (U) red gun activities;
5. (U) MILES limitations;
6. (U) false cover;

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7. (U) simulations related to protective masks;
8. (U) simulations related to smoke, CS/CN or other chemical agents;
9. (U) explosive and incendiary devices and their effects; or
10. (U) ballistic capabilities of exercise weapons.

**c. (U) Verify that the licensee's tactical response drills and FOF exercises are conducted safely and in accordance with site safety plans. (10 CFR Part 73, Appendix B, Section VI, C.3.(l)(5))**

(U) Specific Guidance

(U) To inspect this requirement, the inspector(s) should review the licensee's PSP, implementing procedures, associated drill and exercise documentation, and associated corrective action reports to verify that the licensee has established measures to ensure that drills and exercises are conducted in accordance with site safety plans. In general, the drill and exercise program should include provisions for the following: weapons/ammunition safety, exercise participant safety, site personnel safety, and consideration for radiological safety. Safety measures should be documented in the licensee's implementing procedures.

**d. (U) Verify the licensee's scenarios used during tactical response drills and FOF exercises are developed, designed, and documented in accordance with 10 CFR Part 73, Appendix B VI. (10 CFR Part 73, Appendix B, Section VI, C.3.(m))**

(U) Specific Guidance

(U) To inspect this requirement, the inspector(s) should review a sample of drill and exercise scenarios to ensure the scenarios are developed and designed in accordance with the following requirements:

1. (U) Multiple scenarios are developed and documented for use in conducting quarterly tactical response drills and annual FOF exercises; and
2. (U) The scenario must be designed to test and challenge any component or combination of components of the onsite physical protection program and protective strategy.
3. (U) Each scenario must use a unique target set or target sets, and varying combinations of adversary equipment, strategies, and tactics, to ensure that the combination of all scenarios challenge components of the onsite physical protection program and protective strategy to include, but not limited to, equipment, implementing, procedures, and personnel.

(U) The inspector(s) should review and evaluate previously conducted FOF exercise documentation, e.g., FOF scenario narratives and exercise controller matrices. When evaluating the FOF scenarios, the inspector(s) should use the following guidance to ensure the licensee has developed FOF exercise scenarios consistent with applicable requirements.

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1. (U) Varying target sets
2. (U) Varying DBT attack methodologies (e.g. coordinated vehicle assault and external ground assault, external ground assault only, etc.)
3. (U) Varying attack locations (e.g. locations from which the MAF initiates the assault on the applicable perimeter barrier(s) from which the licensee initiates response)
4. (U) Varying DBT attack configurations (e.g. single or multiple entry points and pathways)
5. (U) Varying barrier breaching methodologies
6. (U) Varying DBT initiating actions conducted by the MAF (e.g. stealth, deceptive actions, diversionary actions, etc.)
7. (U) Varying DBT hand carried equipment, including incapacitating agents
8. (U) Varying DBT explosives and varying DBT tactics for the deployment of explosives
9. (U) Varying DBT weapons, including automatic weapons, sound suppressed weapons, and long-range weaponry
10. (U) Varying plant operating modes and conditions
11. (OUO-SRI) REDACTED
- (OUO-SRI) REDACTED

(U) TIER III

02.08 (U) Reviews.

**(U) Events and Logs.** Review and evaluate the licensee's physical security event log for the previous 12 months or since the last inspection, for events associated with the protective strategy and the PEP and follow up, if appropriate. In conjunction with IP 71153, "Follow up of Events and Notices of Enforcement Discretion," review any written follow-up reports of physical security events associated with the protective strategy and the PEP. (10 CFR 73.55(b)(10), and 10 CFR 73.1205, 10 CFR 73.1210)

**(U) Security Program Reviews.** Verify that the licensee is conducting security program reviews in accordance with 10 CFR 73.55(m) and that the licensee's protective strategy and PEP was included in a review as required by the regulation. (10 CFR 73.55(m), and 10 CFR Part 73, Appendix C, Section II C.)

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**(U) Identification and Resolution of Problems. Verify that the licensee is identifying issues related to its protective strategy and PEP at an appropriate threshold and entering them in the licensee's problem identification and resolution program. Verify that the licensee has appropriately resolved the issues regarding regulatory requirements for a selected sample of problems associated with its protective strategy and PEP. (10 CFR 73.55(b)(10))**

(U) Specific Guidance.

(U) Before the inspection, the inspector should determine if a Security Event Report (SER), in accordance with 10 CFR 73.1205, has been submitted to the NRC by the licensee. Closeout of SERs is performed under Section 03.02 of IP 71153; however, the inspector should assess if additional follow-up under this IP is warranted for the conditions or corrective actions associated with the SER.

(U) The inspector(s) should review and evaluate licensee physical security event log entries documented in accordance with 10 CFR 73.1210 relating to the licensee PEP and responses or response capabilities for follow-up at the site. If discrepancies or deficiencies are identified during this review, the inspector(s) should follow up as necessary.

(U) The inspector(s) should review the documented results of the security program reviews or audits performed by the licensee to ensure the continued effectiveness of its protective strategy and PEP. The inspector(s) should ensure that the reviews have been conducted in accordance with the requirements of 10 CFR 73.55(m). The inspector(s) should also request that the licensee provide a copy of the report that was developed and provided to licensee management for review. The inspector(s) should review the report to identify any findings that were identified via the review or audit to ensure the findings were entered in the licensee's problem identification and resolution program.

(U) The inspector(s) should review a sample of entries in the licensee's problem identification and resolution program associated with the protective strategy and PEP. The intent of this review is to verify that the licensee is identifying deficiencies at the appropriate threshold, tracking deficiencies for trending, and correcting deficiencies commensurate with their security significance. Inspectors can follow-up on select samples in accordance with this procedure to ensure corrective actions are commensurate with the significance of the issue. Refer to IP 71152, "Problem Identification and Resolution (PI&R)," Section 03.01 for additional guidance.

02.09 (U) Protective Strategy Assessment

- a. (U) **Verify that there is at least one member of the security organization, onsite and available at all times, who has the authority to direct the activities of the security organization and who is assigned no other duties that would interfere with the individual's ability to perform these duties in accordance with the licensee's PSP, and protective strategy. (10 CFR 73.55(d)(2)(ii))**

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(U) Specific Guidance

(~~OUO-SRI~~) **REDACTED**

(U) If this individual is armed, trained, and qualified with their assigned weapon(s) and equipment in accordance with the licensee's PSP, then they may use the force continuum including the use of deadly force, in accordance with applicable State law, for targets of opportunity and self-defense during contingency events when implementing the site's protective strategy.

- b. (U) **Verify that both the licensee's plant operations staff and security organization participate in assessing and managing changes to plant configurations, facility conditions, or security before implementing changes such as physical modifications, procedural changes, changes to operator actions or security assignments, maintenance activities, system reconfigurations, access modifications or restrictions, and changes to the security plans and its implementation. (10 CFR 73.58(b) and (c))**

(U) Specific Guidance

(U) When inspecting this requirement, the inspector(s) should review the licensee's PSP, safeguards contingency plan, and implementing procedures which demonstrate the licensee's practices for safety/security interface.

(U) The inspector(s) should also interview plant operations and security personnel responsible for communicating changes such as physical modifications, procedural changes, changes to operator actions or security assignments, maintenance activities, system reconfigurations, access modifications or restrictions, and changes to the security plans to verify that these changes are evaluated for impact to plant safety and security before implementation. For further information see RG 5.74, "Managing the Safety/Security Interface."

02.10 (U) Components of the Protective Strategy

- a. (U) **Verify that the licensee maintains a documented copy of liaison that it established with local law enforcement agencies. (10 CFR 73.55(k)(9))**

(U) Specific Guidance

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(U) For the inspection of this requirement the inspector(s) should request that the licensee provide a copy of its documented liaison that it has established with local (local, State, Federal) law enforcement agencies. The liaison should be in the form of a written document (i.e., letter, agreement, memorandum of understanding, etc.) that demonstrates that the licensee has requested the assistance of these agencies to support its security force with contingency events. Though the NRC requires licensees to establish and document liaison with law enforcement agencies, the NRC does not possess regulatory or jurisdictional authority over law enforcement agencies and cannot mandate their support or the level of support they provide to a licensee. The inspector(s) should verify the licensee's established law enforcement liaison to the extent documented in the PSP and implementing procedures and as discussed during the presentation of the protective strategy overview/briefing.

02.11 (U) Performance Evaluation Program

- a. **(U) Verify that the licensee has established measures to ensure performance evaluations conducted at an operating reactor do not pose the potential for adverse effects on safety and security. (10 CFR Part 73.58(b))**

(U) Specific Guidance

(U) For the inspection of this requirement, the inspector(s) should ensure that the licensee has established procedures that account for both physical and procedural restraining measures required to be in place during exercises conducted in the licensee PEP. These procedures should demonstrate the licensee's practices for safety/security interface to ensure PEP activities do not impede or impair the safe operation of the site.

(U) The inspector should ensure that the licensee has established a briefing structure that supports its performance and evaluation program and that discuss safety/security interface issues adequately.

71130.05-03 (U) RESOURCE ESTIMATE

(U) The resource estimate for the completion of this procedure consists of approximately **80** hours for the inspection of the minimum range of inspection requirements, approximately **99** hours for the inspection of the nominal range of inspection requirements, and **118** hours for the inspection of the maximum range of inspection requirements. The sample size for this procedure is two.

(U) Observation of the licensee's FOF exercise requires participation by a minimum of two NRC inspectors in order to complete the necessary observations of players and adversaries.

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#### 71130.05-04 (U) PROCEDURE COMPLETION

(U) The inspection of the minimum number of inspection requirements will constitute completion of this procedure. The total number of Tier I inspection requirements (26) constitutes the minimum number of inspection requirements for completion of this procedure. The inspection requirement range for completion is as follows: minimum range – 26 inspection requirements, nominal range – 44 inspection requirements, maximum range – 50 inspection requirements. The inspection of the nominal range of inspection requirements within this procedure is the target range for this sample and should be completed to the extent practicable.

(U) The nominal range of inspection requirements for this inspection activity is defined as 26 Tier I inspection requirements, 14 Tier II inspection requirements, and 4 Tier III inspection requirements (total 44 inspection requirements).

(U) Inspector(s) are required to observe, at a minimum, one licensee-conducted annual FOF exercise over the triennial inspection cycle in order to complete this inspection procedure. NRC-evaluated exercises do not count as an annual licensee-conducted FOF exercise for the purpose of completing this inspection procedure. This inspection procedure consists of two samples; one sample is defined as the protective strategy evaluation while the other sample is defined as the PEP.

(U) The frequency at which this inspection activity is to be conducted is triennially (once every 3 years).

#### 71130.05-05 (U) REFERENCES

Implementation Guidance for Interim Safeguards & Security Compensatory Measures for the Order dated February 25, 2002, Revision 1, dated July 24, 2002

Inspection Update Related to Contingency Response Timelines. (Agencywide Document and Management System (ADAMS) Accession No. ML18236A535 (non-public))

Regulatory Issue Summary 2003-06, "High Security Protected and Vital Area Barrier/Equipment Penetration Manual"

NUREG/CR-6190, "Protection Against Malevolent Use of Vehicles at Nuclear Power Plants", Revision 1

NUREG/CR-7145, "Nuclear Power Plant Security Assessment Guide"

IP 71130.03, "Contingency Response – Force-on-Force Testing"

IP 71152, "Problem Identification and Resolution (PI&R)"

Regulator Guide (RG) 5.69, "Guidance for the Application of the Radiological Design-Basis-Threat in the Design, Development, and Implementation of a Physical Security Program that meets 10 CFR 73.55 Requirements", Revision 1

RG 5.74, "Managing the Safety/Security Interface", Revision 1

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RG 5.75, "Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities", Revision 1

RG 5.76, "Physical Protection Programs at Nuclear Power Reactors", Revision 1

(U) END

**DRAFT**