

SRM-COMSECY-19-00006

Implementation: IP & IMC Revision

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Agenda

- Background
- Revised Implementation Timeline
- Revision Summary
 - IP 71130.03, “Contingency Response – Force-on-Force Testing.”
 - IP 71130.05, “Protective Strategy Evaluation and Performance Evaluation Program.”
 - IMC 0609, Appendix E, Part II, “Force-on-Force Significance Determination Process.”
 - IMC 0308, Attachment 6, “Basis Document for Security Cornerstone of the Reactor Oversight Process.”
- Open Discussion and Questions

Force-on-Force Inspection Framework

- On May 17, 2024, the Commission issued SRM-COMSECY-19-0006 approving a revised force-on-force (FOF) 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).
 - Corresponding revision to the FOF Significance Determination Process to reflect the approved changes to IP 71130.03.

Summary of Resource Changes to IPs

IP 71130.03

- Current
 - 393 hours direct inspection.
- Revised
 - 275 hours direct inspection.
 - Team composition specified to 1 team lead, 2 HQ-based inspectors, 1 region-based inspector.

IP 71130.05

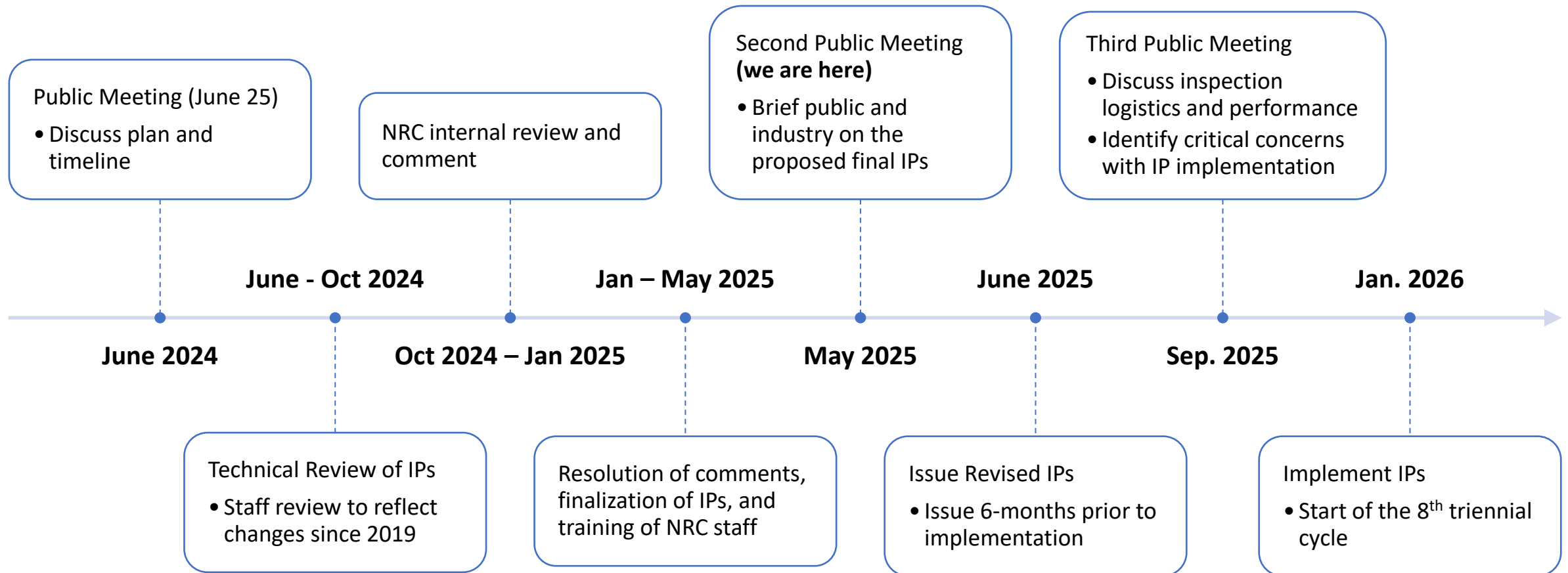
- Current
 - 89 hours nominal direct inspection.
- Revised
 - 99 hours nominal direct inspection.
 - Guidance added that exercise observation requires a minimum of 2 inspectors.

This revision results in a net 108-hour reduction in overall inspection effort per site

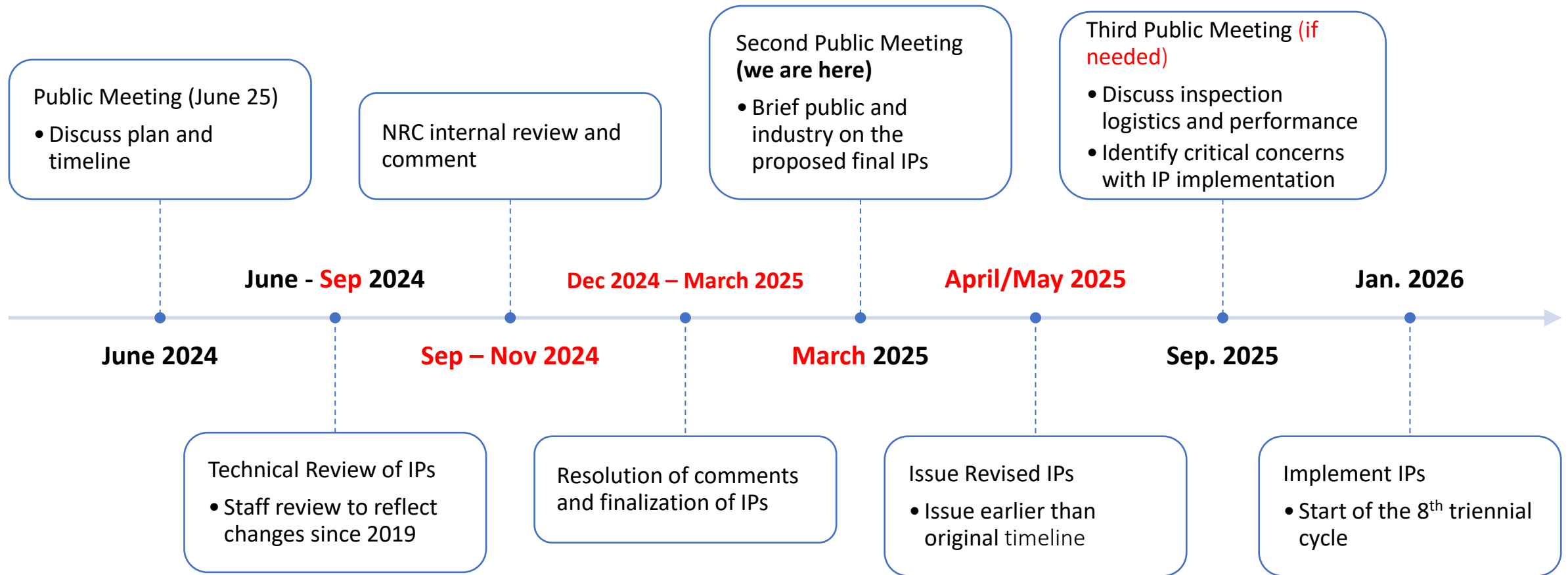
Inspection Procedure Review and Revision

- The staff have revised IP 71130.03 and IP 71130.05 to implement the revised FOF framework and take “into account intervening changes to the inspection procedures...” since the COMSECY was provided to the Commission.
- Included in the staff revision:
 - Verified all changes aligned with regulatory requirements.
 - Improved guidance related to the evaluation of scenario planning and adversary performance.
 - Validated the resource estimate for both IPs.
 - Revised in accordance with administrative format and structure changes since 2019 consistent with IMC 0040.

Implementation Timeline (original)



Implementation Timeline (**updated**)



IP 71130.03, “Contingency Response – Force-on-Force Testing”

IP revision details.

IP 71130.03 (1 of 5)

- Changed to 1 NRC conducted FOF exercise, revised resource estimate accordingly.
 - As directed by the Commission, selection of Option 3 in SRM-SECY-17-0100 (ML18283A072).
 - Inspection is still conducted over a 2-week on-site period (separate planning and exercise weeks) with an offsite portion between.
- Eliminated redundancy with other baseline IPs.
 - Inspection requirements were refocused on those necessary for successful scenario development and exercise performance.
 - Removed inspection requirements were confirmed to be contained in other inspection procedures (e.g., protective strategy evaluation, equipment testing).
- Revised the inspection objectives to align with COMSECY direction to place a greater focus on mission planning and exercise evaluation.

IP 71130.03 (2 of 5)

- Inspection requirements were separated to improve readability and inspection tracking.
 - Requirements were split into discrete steps for preparation, planning, development, and exercise performance.
- Added guidance related to scenario development and conduct of the exercise.
 - Inspection guidance was adjusted to better focus activities on exercise scenario development and performance.
 - Inspectors will still develop two exercise scenarios in the event that one scenario cannot be used or if a Re-Visit Inspection is required.

IP 71130.03 (3 of 5)

- Revised the definition of an Effective Exercise.
- Original:
 - Effective Exercise – An exercise where the licensee demonstrated effective implementation of its protective strategy in accordance with plans approved by the NRC and related implementation procedures, regulatory requirements, or other Commission requirements, such as orders or confirmatory action letters affecting protective strategy for the conduct of the FOF exercise.
- Revised:
 - Effective Exercise – An exercise where the licensee's protective strategy successfully protected the selected target set from simulated destruction and compromise by the mock adversary force in order to prevent significant core damage and spent fuel sabotage in accordance with implementation procedures, regulatory requirements, or other Commission requirements.

IP 71130.03 (4 of 5)

- Revised the definition of an Ineffective Exercise.
- Original:
 - Ineffective Exercise – An exercise where the licensee did not demonstrate effective implementation of its protective strategy in accordance with plans approved by the NRC and related implementation procedures, regulatory requirements, or other Commission requirements, such as orders or confirmatory action letters affecting protective strategy for the conduct of the FOF exercise. This exercise outcome results from demonstrated performance less than a marginal exercise.
- Revised:
 - Ineffective Exercise – An exercise where the licensee's protective strategy failed to adequately protect the selected target set from simulated destruction and compromise by the mock adversary force in accordance with implementation procedures, regulatory requirements, or other Commission requirements such that all components of the selected target set were simulated destroyed or compromised.

IP 71130.03 (5 of 5)

- Improved guidance for Re-Visit inspections.
 - Added links to appropriate inspection guidance for Re-Visit inspection activities (e.g., IP 71152 and IP 71130.05).
 - Added link to IMC 0609, Appendix E, Part II for exercises that may not result in a performance deficiency but require a Re-Visit inspection determination.
- Added guidance for steps to prevent an indeterminate exercise.
 - Added guidance for the inspection team on additional measures that can be taken to gather sufficient information to make an exercise determination.
- Recategorized as Official Use Only – Security Related Information.

IP 71130.05, “Protective Strategy Evaluation and Performance Evaluation Program”

IP revision details.

IP 71130.05 (1 of 5)

- Added a Tier I inspection element to verify maintenance, testing, and calibration of MILES equipment.
 - Separated into an independent inspection requirement.
 - Moved to Tier I so that performance is required for minimum completion of the procedure, consistent with COMSECY direction.

IP 71130.05 (2 of 5)

- Inspection of MILES equipment
 - 10 CFR 73.55(b)(6): “licensee shall establish, maintain, and implement a performance evaluation program in accordance with appendix B.”
 - 10 CFR 73, App B, Section VI.C.3(k)(3): “licensees shall: Implement the use of systems or methodologies that simulate the realities of armed engagement through visual and audible means...”
 - 10 CFR 73, App B, Section VI.C.3(k)(2): “licensees shall: Minimize the number and effects of artificialities associated with tactical response drills and force-on-force exercises.”
 - 10 CFR 73.55(n)(1)(i): “licensee shall establish, maintain, and implement a maintenance, testing and calibration program to ensure that security systems and equipment... are capable of performing their intended functions.”

IP 71130.05 (3 of 5)

- Added a Tier I inspection element to review licensee developed FOF exercise scenario.
 - Added inspection guidance to perform this element prior to on-site inspection week.
 - Allows the inspectors sufficient time to raise concerns about the adequacy of the planned exercise or simulations prior to inspection week.

IP 71130.05 (4 of 5)

- Added guidance on exercise observation.
 - Clarified inspector roles during exercise observation and that both responders and mock adversaries should be observed during the exercise.
- Added a Tier I inspection element on mock adversary force (MAF) training and qualification.
 - Added guidance for assessing MAF training equivalency to the DBT adversary.
 - Added guidance from RG 5.75 as an example, not a requirement.
 - Credit for separate NRC verification of training and qualification of current CAF and JCAF members.

IP 71130.05 (5 of 5)

- Added guidance on review of previous exercise scenarios.
 - Enhanced an existing Tier II inspection requirement with additional guidance.
 - Documentation review to verify exercises met regulatory requirements.
- Adjusted the resource estimate to reflect new inspection requirements.
 - Added 10 hours to the resource estimate.
 - Clarified that the inspection should be conducted by a minimum of 2 inspectors.

IMC 0609, Appendix E, Part II, “Force-on-Force Significance Determination Process”

IMC revision details.

IMC 0609, Appendix E, Part II (1 of 2)

- Revised to reflect performance of one exercise.
 - Each exercise is independently assessed for significance. No aggregation for current performance or Re-Visit Actions.
- All findings related to ineffective exercise performance are screened Green.
 - All other findings are screened by IMC 0609, Appendix E, Part I.
- Eliminated “marginal exercise” outcomes.
 - Based on a determination that all marginal exercises are effective.
- Eliminated Performance Threshold Criteria (PTC).
 - Based on a determination that PTC aggregated inputs that were already part of the overall baseline assessment program.

IMC 0609, Appendix E, Part II (2 of 2)

- Revised the definition of an Effective and Ineffective exercise.
 - Same definitions contained in IP 71130.03.
- Clarified guidance on the determination of the Re-Visit Action following an Ineffective or Indeterminate exercise outcome.
 - Ineffective exercises will receive an NRC-conducted exercise Re-Visit Action.
 - Indeterminate exercise may receive one of three potential Re-Visit Actions:
 - NRC-conducted exercise.
 - NRC observation of a licensee-conducted exercise.
 - Review of the corrective actions that caused the indeterminate exercise.
- Publicly available.

IMC 0308, Attachment 6, “Basis Document for the Security Cornerstone of the Reactor Oversight Process”

IMC revision details.

IMC 0308, Attachment 6

- Revised to reflect SRM-COMSECY-19-0006 changes to the FOF Inspection Framework.
- Revised to reflect other changes to the baseline inspection program since the last revision.
 - Addition of IP 71130.07EW for sites with enhanced weapons preemption authority.
 - Addition of IP 71130.09 for inspection of security plan changes.
 - Addition of IP 71130.10 for inspection of licensee cybersecurity.
 - Addition of IP 92707 as an alternate to IP 71130.03 for situations that represent hazardous conditions for inspection and licensee staff.
 - Removal and renumbering of inspection of licensee protection of safeguards information from IP 71130.06 to 2201, Appendix C procedure IP 81822.

Next Steps

- Issue the Revised IPs and IMCs in April or May.
- Conduct internal training for NRC staff on the revised inspection procedures in May.
- Hold an additional public meeting, if requested, in September to discuss inspection logistics and implementation.
- Implement the revised IPs on January 1, 2026.

Open Discussion and Questions

Thank you for attending this Public Meeting. If you have any additional questions following the meeting, I can be reached at Jeffrey.Bream@nrc.gov