



# NRC Security Status Update for the ADVANCE Act Section 507



May 21, 2025

# Security Response to Section 507 of the ADVANCE Act:

In response to Section 507 of the ADVANCE ACT, the Office of Nuclear Security and Incident Response (NSIR) conducted a thorough review and assessment of the physical and cybersecurity oversight and inspection program to identify efficiencies, eliminate redundancies, and standardize routine processes while ensuring a risk-informed, performance-based approach to security oversight and inspection functions.



# Status of Security Initiatives for Operating Reactors

# NSIR Oversight and Inspection Initiative 1 for Operating Rx

- **Revise the inspection frequency for IP 71130.07 “Security Training” from biennial to triennial.**
- Status: Complete - IP 71130.07 has been revised
- Implementation: Start of 10<sup>th</sup> ROP triennial cycle CY 2026
- Link to ADVANCE Act: Travel resources, inspection planning/preparation, use of technology/data, preparation/documentation time (Section 507 (d)(1)(A), (B), and (C))

# NSIR Oversight and Inspection Initiative 2 for Operating Rx

- **Perform a risk-informed evaluation of all inspection requirements in security baseline IPs to validate prioritization (i.e., Tier I, II, and III)**
- Minimum samples will constitute procedure completion.
- Status: In progress - IP revisions are underway.
- Implementation: January 2026
- Link to ADVANCE Act: Risk-inform procedures, balance level of resources with safety significance, review inspection resources based on licensee performance (Section 507 (d)(3)(A) and (B))

# Industry Proposed Initiative

- **Apply risk-informed and performance-based principles.**
  - Prioritize and scope each inspection to be commensurate with risk and licensee performance, considering previous inspection findings, performance indicators, and corrective action program reviews.
- Aligns with NSIR initiative 1 and 2
  - Inspection frequency and risk informed evaluation
- NRC Evaluation: Accepted for implementation
- Status: In progress
- Implementation: January 2026

# NSIR Oversight and Inspection Initiative 3 for Operating Rx

- **Develop an inspection schedule for security baseline inspections to reduce travel costs and maximize time on-site.**
  - For instance, IPs 71130.02, .05, and .14 would be inspected during the same week, possibly reducing two additional trips to the site.
- Status: In progress
- Implementation: CY 2027
  - Inspection schedules and licensee drill dates are already developed for CY 2026. This timeline will allow the regions to coordinate with licensees.
- Link to ADVANCE Act: Travel resources, inspection preparation/documentation time, documentation collection time (Section 507 (d)(1)(A),(B)and (C))

IP 71130.02- Access Control

IP 71130.05- Protective Strategy Evaluation and Performance Evaluation Program

IP 71130.14- Review of Power Reactor Target Sets

# Industry Proposed Initiative

- **Optimize the use of fleet-level inspections.**
- Aligns with NSIR Initiative 3
  - Inspection schedule
- NRC Evaluation: Accepted for implementation
- Status: Not started
  - For inspections that involve the corporate office, the region will coordinate inspections with the site and corporate office to maximize resources and reduce duplicate effort.
- Implementation: CY 2027



# Industry Proposed Initiative

- **Re-allocate inspection resources to gain efficiencies in travel resources.**
  - Assess current inspection scope for the resident inspectors, region, and headquarters and divide the scope to gain efficiency (e.g., target sets, lock and key, evaluated Force on Force).
- Aligns in part with NSIR Initiative 3
  - Inspection schedule
- NRC Evaluation: Accepted in part for implementation
- Status: In progress
  - This initiative will be implemented in part by creating efficiencies through the scheduling and resources of inspections.
  - Example: Resident inspectors who are target set qualified, may conduct that inspection thus reducing travel resources.
  - Inspectors must hold qualifications for the program area they inspect.
- Implementation: CY 2026

# NSIR Oversight and Inspection Initiative 4 for Operating Rx

- **Develop a standard request for information template for each IP.**
- Status: Complete - Templates have been developed for each IP
- Implementation: Effective July 1, 2025, and January 1, 2026
- Link to ADVANCE Act: Inspection Preparation/documentation time, documentation collection time (Section 507 (d)(1)(B)and (C))

| July 1, 2025                    | January 1, 2026  |
|---------------------------------|--|
| 71130.01 - Access Authorization | 71130.03 - Contingency Response Force-on-Force Testing                       |
| 71130.02 - Access Control       | 71130.04 - Equipment Performance, Testing, and Maintenance                   |
|                                 | 71130.05 - Protective Strategy Evaluation and Performance Evaluation Program |
|                                 | 71130.07 - Security Training   |
|                                 | 71130.08 - Fitness-for-Duty  |
|                                 | 71130.14 - Review of Power Reactor Target Sets                               |

# Industry Proposed Initiative

- **Standardize requests for information to support baseline inspection activities.**
- Aligns with NSIR Initiative 4
  - Request for information template
- NRC Evaluation: Accepted for implementation
- Status: In progress
- Implementation: July 1, 2025, and January 1, 2026

# NSIR Oversight and Inspection Initiative 5 for Operating Rx

- **Expand the language in Inspection Manual Chapter (IMC) 0612 and 0612 App B for Very Low Safety Significance Issue Resolution (VLSSIR) to add clarity for security related inspection issues of concern.**
- Status: Completed- Revisions have been made to associated IMCs
- Implementation: May 2025
- Link to ADVANCE Act: Level of resources commensurate with the safety significance (Section 507 (d)(3)(A))

# NSIR Oversight and Inspection Initiative 6\* for Operating Rx

- **SRM-COMSECY 19-0006 (FOF Revisions)**

- Reduces inspection procedure (IP) 71130.03 Force-on-Force (FOF) inspection program from 2 NRC conducted exercises to 1 exercise.
- Reduction of hours in IP 71130.03 from 393 hours to 275 hours.

- SRM was underway prior to the ADVANCE Act; implementation will incorporate the ADVANCE Act goals.

- Incorporated additional enhancements to eliminate inspection redundancies, enhance guidance for inspection planning and performance, reduce impact of licensee and NRC resources.

\*Commission Approval Received

# NSIR Oversight and Inspection Initiative 6\* for Operating Rx (cont.)

- Status: In progress- revisions to the inspection procedures are close to completion.
- Implementation: January 1, 2026, Start of Triennial FOF Cycle 9
- Link to ADVANCE Act: Travel resources, inspection planning/preparation, preparation/documentation time, elimination of duplicative activities (Section 507 (d)(1)(A), (B), and (C) and (d)(2)(A))

# Industry Proposed Initiative

- **Review inspection procedures and eliminate duplicative inspection requirements.**
  - 71130.03 and 71130.05
- Aligns with NSIR Initiative 6
  - SRM-COMSECY-19-0006
- NRC Evaluation: Accepted for implementation
- Status: In progress- revisions to the inspection procedures are close to completion.
- Implementation: January 2026

# Industry Proposed Initiative

- **Credit for licensee performance during force-on-force inspections.**
  - Implement an inspection model like the emergency preparedness (EP) evaluated exercises as an approach to demonstrate reasonable assurance in FOF inspections if a licensee's baseline performance warrants (e.g., no action matrix movement due to security performance).
- In part, aligns with NSIR initiative 6
  - SRM-COMSECY-19-0006
- NRC Evaluation: Accepted in part for implementation.
  - All FOF related exercise performance deficiencies will screen as green, thus no action matrix movement.
  - Implementation of EP model is not within the existing Commission direction outlined in SRM-COMSECY-19-0006.
    - NEI provided a letter to NSIR proposing an EP-like approach for scenario development. As a next step, NSIR will conduct a public meeting to discuss the specifics of the proposal.
- Status: Complete
- Implementation: January 1, 2026



- **Revise the Baseline Security Significance Determination Process (BSSDP).**
- Status: In progress- draft BSSDP is being developed.
  - Commission approval required. On track to submit a SECY paper in October 2025. A public meeting will be conducted in late spring 2025 to provide an update.
- Implementation: TBD pending Commission approval
- Link to ADVANCE Act: Risk-informed, performance-based assessment, preparation/documentation time, inspection approach with the level of resources commensurate with safety significance (Section 507 (d)(1)(B), (C), and (3)(A))

\*Commission Approval Required

# Industry Proposed Initiative

- **Simplify the BSSDP for power reactors.**
- Aligns with NSIR initiative 7
  - BSSDP
- NRC Evaluation: Accepted for implementation
- Status: In progress, on track for the SECY to go to the Commission in October 2025.
- Implementation: TBD

# NSIR Oversight and Inspection Initiative 8 for Operating Rx

- **Enhance the Security Issues Forum (SIF) process.**
- Status: In progress, draft SIF Charter has been developed, will be issued in July 2025.
- Implementation: July 2025
- Link to ADVANCE Act: Improve oversight and inspections (Section 507 (d)(2))

# NSIR Oversight and Inspection Initiative 9 for Operating Rx

- **Removed IP 71130.06 “Protection of Safeguards Information” from the baseline inspection program and placed it in IMC 2201, Appendix C, Generic, Special, and Infrequent Inspections.**
- Status: Complete
- Implementation: September 1, 2024, and redesignated as IP 81822
- Link to ADVANCE Act: Improve oversight and inspections (Section 507 (d)(2)(A))

## Cybersecurity Inspection

- **Evaluate the inspection frequency and resources.**
- **Revise the inspection procedure (IP) and request for information (RFI) document .**
- **Use of risk informed principles for sampling as much as possible.**
- **Streamline/reduce amount of information requested for inspections.**

# NSIR Oversight and Inspection Initiative 10 for Operating Rx (cont.)

## Status:

- Final stages of the evaluation to determine the inspection frequency and resources.

Implementation: January 2026

- Link to ADVANCE Act: Improve oversight and inspections (Section 507 (d)(2)(A))

# Industry Proposed Initiative

- **Revise the cybersecurity inspection procedure to reflect the maturity of licensee programs.**
- Aligns with NSIR Initiative 10
- NRC Evaluation: Accepted for revision
- Status:
  - IP 71130.10 currently under revision (risk-informed sampling, inspection requirements guidance).
  - RFI: Evaluation of proposed ideas to achieve effectiveness and use of modern tools to reduce amount of information requested.
- Implementation: January 2026

# Industry Proposed Initiative

- **Credit existing performance indicators (PI) for inspection efficiencies.**
  - Remove inspection elements that are already being assessed with PIs.
- Aligns with an NRR initiative for Section 507 of the ADVANCE Act
- NRC Evaluation: Accepted
- Status: In progress, working group has been established.
  - Public meeting scheduled for June 5, 2025.
- Implementation: TBD



# Industry Proposed Initiative

- **Eliminate blind performance test sample submittals to HHS laboratories.**
- Revisions to the blind testing program included in “SECY-24-0058, Rulemaking Plan on Drug and Alcohol Testing: Technical Issues and Editor Changes.”
- Status: In progress, plan submitted to the Commission in July 2024
- Implementation: TBD

# Industry Proposed Initiative

- **Augment current urine testing with oral fluid testing for all testing conditions.**
- Aligns with “SECY-24-0058, Rulemaking Plan on Drug and Alcohol Testing: Technical Issues and Editor Changes.”
- Status: In progress, plan submitted to the Commission in July 2024
- Implementation: TBD

# Industry Proposed Initiative

- **Redefine the minor/more-than-minor threshold.**
- Aligns with the NRR initiative for Section 507 of the ADVANCE Act.
- Evaluation: Accepted
- Status: In progress
- Implementation: 1<sup>st</sup> Quarter 2026

# Industry Proposed Initiative

- **Optimize qualifications for armed response force member that continue to meet the reasonable assurance standard.**
  - Consider NEI Annual FOF Exercise Whitepaper
- NRC Evaluation: Complete
  - NEI provided for the whitepaper to the NRC for information only, not approval.
- Status: Concerns with regulatory compliance were communicated during a public meeting on 3/27/25. Currently, with NEI to decide path forward.
- Implementation: TBD



# Status of Security Initiatives for Fuel Cycle Facilities

# NSIR Oversight and Inspection Initiative 1 for Fuel Cycle Facilities

- **Evaluate all CAT I physical security IPs to identify and remove any redundancies.**
- **Evaluate the combination and elimination of three protective strategy-specific IPs.**
  - Keep IPs 81700.05 and 81700.11.
  - Eliminate IP 81700.06.
  - Disperse elements of IP 81700.06 into 81700.05 and 81700.11.
- Status: In progress- revisions are underway to associated IPs
- Implementation: CY 2027
- Link to ADVANCE Act: Reduction in inspection effort (20+ hours), preparation/documentation and reduce travel costs. (Section 507 (d)(1)(A), (B), (C) and (d)(2)(A))

IP 81700.05, "Category I Fuel Cycle Facility Physical Protection and Protective Strategy"

IP 81700.06, "Licensee Conducted Force-on-Force Exercises at Category I Fuel Cycle Facilities"

IP 81700.11, "Annual Observation of Licensee Conducted Force-on-Force Exercises at Category I Fuel Cycle Facilities"

# NSIR Oversight and Inspection Initiative 2 for Fuel Cycle Facilities

- **Redesignate IP 81700.10 “Safeguards Information” (SGI) to an “as needed” IP.**
- Status: In progress- revisions are underway to the associated IPs
- Implementation: CY 2026
- Link to ADVANCE Act: Improve oversight and inspections, eliminate duplicative activities (Section 507 (d)(2)(A))

# NSIR Oversight and Inspection Initiative 3 for Fuel Cycle Facilities

- **Revise template language in the reactor program system (RPS) for CAT I fuel facilities to align with power reactor template language for physical security reports.**
- Status: In progress- revision underway
- Implementation: June 2025
- Link to ADVANCE Act: Increase use of templates in documentation (Section 507 (d)(2)(B))



# NSIR Oversight and Inspection Initiative 4 for Fuel Cycle Facilities

- **Revise IMC 0616, “Fuel Cycle Safety and Safeguards Inspection Reports” to include language that would allow physical security inspection reports to contain different information than non-security reports.**
- Status: Complete- revisions have been made to IMC 0616
- Implementation: June 2025
- Link to ADVANCE Act: Increase use of templates in documentation (Section 507 (d)(2)(B))



# Questions?