

Reactor Oversight Program Security Baseline Inspection

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Rebaseline Proposal and Concept

- In concert with NRR efforts, NSIR performed an assessment of the security baseline inspection program
 - Enhance efficiency
 - Improve resource utilization
 - Reduce unnecessary burden
 - Maintain a strong risk-informed regulatory presence
- Inspection should be those activities necessary for verification that licensee performance represents reasonable assurance of adequate protection.

Applicable Statutory Requirements

- Atomic Energy Act of 1954, as amended, Section 170D
 - The NRC must perform a security evaluation every 3 years to assess the ability of a private security force of a licensed facility to defend against the design basis threat.
 - The security evaluation must include a Force-on-Force exercise.
 - The NRC must mitigate any potential conflict of interest that could influence the results of a force-on-force exercise.
 - The NRC must verify that deficiencies identified during the security evaluation are corrected by the licensee.

Current 71130 Security Baseline Inspection Suite

Inspection Procedure	Frequency	Hours
71130.01, Access Authorization	T	25
71130.02, Access Control	A	28
71130.03, Contingency Response – Force-on-Force Exercise	T	393*
71130.04, Equipment Performance, Testing, and Maintenance	B	37
71130.05, Protective Strategy Evaluation and Performance Evaluation Program	T	89*
71130.07, Security Training	B	27
71130.08, Fitness for Duty Program	T	24
71130.09, Security Plan Changes	A	7
71130.10, Cybersecurity	B	70
71130.11, Material Control and Accounting	T	16
71130.14, Review of Power Reactor Target Sets	T	10

* SRM-COMSECY-19-0006 approved changes to IP 71130.03 and IP 71130.05 that are scheduled to be implemented in January 2026. The revised IPs will be 275 hours for IP 71130.03 and 99 hours for IP 71130.05.

Security Baseline Inspection Proposal

- The majority of the existing procedures will be retired and replaced with new procedures.
 - The existing procedures will be retained as inspector reference.
- New procedures will focus on licensee security performance and compliance with general performance objectives.
- Risk significant elements of the existing procedures will be extracted and combined into the appropriate new procedures.
- All of the new procedures will be triennial, except for one that will be annual

Licensee Security Performance and Problem Identification and Resolution

- In field observation of licensee security officer performance
 - E.g., searches, patrols, alarm station operations, etc.
- Walkdowns of a sample of security equipment
 - Verify deficiencies are identified and corrected
- Problem identification and resolution program review
- Security plan change review, as needed
- Security event report review, as needed

Number	Frequency	Title	Samples	Hours
71130.15	Annual	Licensee Security Performance and Problem Identification and Resolution	5	24

Security Equipment and Training

- Sample of testing and maintenance records for security equipment
 - E.g., physical barriers, weapons, OCA surveillance equipment, etc.
- Observation of testing of perimeter intrusion detection systems
- Security training and qualification plan and implementing procedures
 - Verification of security officer training implementation
- Initial and annual training
- Tactical qualification and physical fitness test

Number	Frequency	Title	Samples	Hours
71130.16	Triennial	Security Equipment and Training	5	50

Design and Implementation of the Protective Strategy

- Verification of the design of the protective strategy
- Sample of protective strategy implementation through walkdown
 - E.g., Barrier placement and configuration, defensive positions, etc.
- Observation of a performance evaluation program exercise
 - Scenario development, adversary training, FOF exercise observation
- Review of target set implementation and maintenance
 - Utilize the resident inspector for this activity

Number	Frequency	Title	Samples	Hours
71130.17	Triennial	Design and Implementation of the Protective Strategy	4	80

Access Authorization and Fitness for Duty

- Sample of records for access authorization and fitness for duty
- Verification of licensee performance of implementing procedures
- Observation of collection facilities
- Designed specifically to facilitate corporate/centralized inspection, if appropriate.
- Resource estimate adjustments identified for single site or multi-site performance

Number	Frequency	Title	Samples	Hours
71130.18	Triennial	Access Authorization and Fitness for Duty	4	35

Cybersecurity

- Inspection frequency will be changed to triennial (currently biennial).
- Team composition: reduction of 1 cybersecurity SME.
 - This is not reflected in the inspection hours because only NRC resources are counted in the IP. However, this represents a reduction in overall inspection effort.
- Inspection procedure revision includes:
 - Elimination of two requirements from the current IP.
 - Include guidance for sample selection based on risk informed principles and consequence assessment for the number of CDAs to inspect.
 - Adjusting request for information (RFI) to require only necessary documentation for completing inspection activities.

Number	Frequency	Title	Samples	Hours
71130.10	Triennial	Cybersecurity	3	70

Material Control and Accounting

- This procedure will be unchanged from current version.
- The procedure will remain in the security cornerstone based on synergy with information protection requirements (OUO-SRI).
- Can be performed by either resident or regional engineering inspectors based on regional determination.

Number	Frequency	Title	Samples	Hours
71130.11	Triennial	Material Control and Accounting	1	16

Contingency Response - Force-on-force Exercise

- Week one: planning
 - Scenario identification and development
- Week two: exercise
 - Performance of one exercise
- Consistent with SRM-COMSECY-19-0006 direction
- Additional efforts to enhance this IP will be part of a future Commission paper

Number	Frequency	Title	Samples	Hours
71130.03	Triennial	Contingency Response - Force-on-force Exercise	1	275*

* Hours reflect SRM-COMSECY-19-0006, effective January 2026

Enhancements to the Force-on-Force Inspection Program

- Exploring improvements to the scenario development process to identify procedure efficiencies. Options under consideration include:
 - Reducing inspector time on site by simplifying scenario development to 1-1.5 days on site
 - Reducing the number of inspectors performing scenario development
 - Licensee development of the exercise scenario with NRC input and ultimate approval
- Expect to reduce the Force-on-Force inspection to ~180 hours based on early projections of improved efficiencies

Proposed 71130 Security Baseline Inspection Suite

Inspection Procedure	Frequency	Hours
71130.03, Contingency Response – Force-on-Force Exercise	T	180*
71130.10, Cybersecurity	T**	70
71130.11, Material Control and Accounting	T	16
71130.15, Security Performance and Problem Identification and Resolution	A	24
71130.16, Security Equipment and Training	T**	50
71130.17, Design and Implementation of the Protective Strategy	T	80
71130.18, Access Authorization and Fitness for Duty	T	35

- This change represents a 42% reduction in baseline security inspection from the current nominal inspection program.
- Or a 33% reduction if you apply the SRM-COMSECY-19-0006 revisions that were approved by the Commission that were scheduled for implementation in 2026.

* Anticipated final hours after revision

** Denotes a change to the periodicity of the current IP or current related IP

Expected Timeline

- Security ROP Rebaseline
 - Major work will be complete by September 2025
 - Will be included in the NRR SECY to the Commission October 2025
 - Implementation upon Commission approval anticipated for January 2026
- Force-on-Force
 - Separate SECY to the Commission due to the history and attention of FOF
 - Timeline for SECY is TBD
 - Implementation upon Commission approval

Final Message

- The development of the draft proposal focused on those inspection activities necessary for verification that licensee performance represents reasonable assurance of adequate protection.
- The development of the draft proposal used risk-informed insights to identify and prioritize inspection activities of greatest significance.
- The proposal simplifies the inspection program to a triennial model for all or most IPs with inspection effort equalized across the inspection cycle.

Questions?