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Potential Force-on-Force Inspection Enhancements

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Security Inspection Program Rebaseline

- On August 19, 2025, the NRC held a public meeting to discuss an assessment of the security baseline inspection program to:
  - Enhance efficiency
  - Improve resource utilization
  - Reduce unnecessary burden
  - Maintain a strong risk-informed regulatory presence
- The assessment includes a review and development of potential changes to the NRC Force-on-Force inspection program.

Potential Enhancements to the Force-on-Force Inspection Program

- Exploring improvements to the scenario development process to identify procedure efficiencies.
- Development and implementation of scenario scoring methodology.
- Increased licensee engagement in the exercise scenario development process.
- Three potential paths under consideration
  - Database of Industry-Developed Generic Exercise Scenarios
  - Database of Licensee-Developed Site-Specific Scenarios
  - Licensee-Developed Inspection-Specific Exercise Scenarios

Public Engagement

- NRC introduced this topic on July 23rd and discussed in more detail on August 19th
- Comments received during the public meetings and after have been reviewed
  - NEI Letter: “Industry Recommendations on Force-on-Force Program Modernization in Response to August 19, 2025, Public Meeting” (ML25245A250)

Scenario Scoring Methodology

- All options under consideration will include a scenario scoring methodology
- Design basis threat (DBT) attributes would be assigned a numerical value
- An upper and lower threshold would be established to bound complexity
- Scoring would ensure the developed scenario does not exceed the adequate protection standard

Potential Path 1: Database of Industry-Developed Generic Exercise Scenarios

- Industry would develop high-level generic exercise scenarios based on general attack methodologies.
  - External assault, land vehicle assault, waterborne, coordinated, etc.
- Scenarios would include the core DBT elements and base scoring value for the mission profile.
- NRC would choose one of the generic scenarios, a target set, and the attack vector. Additional DBT attributes could also be chosen.
  - Additional attributes would be bounded by the scoring threshold
- Licensee would develop the detailed mission narrative based on the NRC input.

Potential Path 2: Database of Licensee-Developed Site-Specific Scenarios

- Licensees would develop a database of scenarios based on site-specific conditions and configuration.
- NRC would choose a pre-developed scenario.
- NRC could alter the route and DBT attributes due to conditions that are perceived to be advantageous to the adversary.
  - Changes would be bounded by the scoring threshold
- Licensee would then develop the detailed mission narrative based on NRC's input.

Potential Path 3: Licensee-Developed Inspection-Specific Exercise Scenario

- NRC would review licensee protective strategy and site-specific conditions.
- NRC would select target set, attack vector, DBT attributes, and any other necessary starting conditions.
  - Conditions would be bounded by scoring threshold.
- Licensee would develop the detailed mission narrative based on the NRC's input.
  - Licensee development of the narrative as opposed to MAF director in current process.

Key Messages

- Per the requirements of the Atomic Energy Act, the NRC FOF inspection program will mitigate potential conflicts of interest that could influence the results of the exercise.
- The options under consideration can still change as internal and external feedback is assessed.
- The NRC will engage with internal and external stakeholders to develop any necessary inspection and implementation guidance following the Commission decision.

Questions?