

February 11, 2014

MEMORANDUM TO: Mark A. Satorius  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS – COMGEA/COMWCO-14-0001 –  
PROPOSED INITIATIVE TO CONDUCT A LESSONS-LEARNED  
REVIEW OF THE NRC'S FORCE-ON-FORCE INSPECTION  
PROGRAM

The staff should conduct a lessons-learned review of the NRC's force-on-force inspection program to evaluate whether any adjustments are necessary to ensure efforts in this area are accomplishing intended objectives effectively and whether NRC's and licensees' efforts are focused on the most important issues to ensure security and safety at the sites. Based on the experience to date, the review should include answers to the following questions:

1. Are current policies and practices for the conduct of force-on-force exercises consistent with the Energy Policy Act of 2005, the requirements of 10 CFR 73.1 and 73.55, and the design basis threat, as described in Regulatory Guide 5.69?
2. Are current policies and practices for immediate notifications of all deficiencies to State and Congressional stakeholders consistent with the Energy Policy Act of 2005? Have there been any unintended consequences? For the first two questions, the staff should also address whether these policies and practices are required by the Energy Policy Act of 2005. If they are not, the staff should describe the methods by which staff determines that such policies and practices - or proposed new practices - are assessed to be consistent with the Act.
3. The staff should explain its view of the specific role of force-on-force exercises in assuring compliance. Are they intended to assure licensee preparation for a myriad of specific scenarios or are they intended to assure licensees overall capability to respond appropriately to a broad range of potential threats?
4. Are the current composite adversary force (CAF) tactics in accordance with the design basis threat and the adversary characteristics document? The same should be addressed for CAF techniques. In addition, the staff should include the process used to determine the nexus to threat information received from Title 50 agencies, to conduct cost/benefit analyses (if any), the opportunities for feedback or insights from the regulated community prior to finalizing any changes in CAF tactics and techniques, as well as the metric(s) used by the staff to determine the increase or improvement in security posture when new tactics and techniques are implemented.
5. Are the level of knowledge of the CAF and the information it is provided by the licensee in accordance with the design basis threat? The staff should address whether the level of knowledge and site awareness provided to both the CAF and other NRC contractors involved in the preparation for and conduct of the force-on-force are commensurate with or in excess of the "well-trained, including military training and skills" standard set forth in 10 CFR Part 73.

6. Is the realism of the force-on-force exercises affected significantly by the number of timeouts? The staff should also address the extent to which it believes additional timeouts are being caused by overly complex scenarios with multiple controller injects and simulation(s).
7. Is the current guidance for unattended openings realistic? The staff should also address whether this guidance is commensurate with threat information and how such determinations are made. For example, the staff should provide any performance testing information developed by NRC, other Federal agencies, or the regulated community that has been used to support changes in the CAF tactics and techniques with respect to the unattended openings criteria.
8. Are the deficiencies identified by force-on-force exercises prioritized with respect to their significance? The staff should also provide the method and basis for any prioritization scheme currently in use, if any.
9. Is the practice of requiring immediate compensatory measures (i.e., before the inspection team leaves the site) appropriate? Have there been any unintended consequences? Also, the staff should address whether the current practice of requiring immediate compensatory measures should be augmented to establish a threshold for determining which deficiencies require immediate corrective action and which deficiencies, if any, could be appropriately prioritized and addressed through the licensee's corrective action program. If so, how would this be done?

Based on the lessons-learned review, the staff should provide a voting paper to the Commission with options and any staff plans or recommendations for revising the NRC security inspection program for commercial nuclear power plants.

(EDO)

(SECY Suspense:

6/11/14)

cc: Chairman Macfarlane  
Commissioner Svinicki  
Commissioner Apostolakis  
Commissioner Magwood  
Commissioner Ostendorff  
OGC  
CFO  
OCA  
OPA  
Office Directors, Regions, ACRS, ASLBP (via E-Mail)  
PDR