

December 19, 2014

MEMORANDUM TO: Mark A. Satorius
Executive Director for Operations

FROM: Rochelle C. Bavol, Acting Secretary **/RA/**

SUBJECT: STAFF REQUIREMENTS – SECY-14-0088 – PROPOSED
OPTIONS TO ADDRESS LESSONS LEARNED REVIEW OF THE
NRC'S FORCE-ON-FORCE INSPECTION PROGRAM IN
RESPONSE TO STAFF REQUIREMENTS –
COMGEA/COMWCO-14-0001

The Commission has approved the staff's recommendation to establish an NRC working group to determine how to better integrate knowledge of adversary training methodologies and actual attacks with the tactics, techniques, and procedures used by the NRC composite adversary force. The staff should use a formal change control process with stakeholder input before implementing changes. In doing so, the staff should ensure that force-on-force exercises continue to be realistic and consistent with the design basis threat. The staff should provide periodic updates to the Commission on this activity, and the working group should report its findings to the Commission in a notation vote paper, with recommendations regarding the need to continue its research and, if the study is complete, any revisions to be made to Composite Adversary Force tactics, techniques and procedures.

(EDO)

(SECY Suspense: 18 months)

The Commission has disapproved the staff's recommendation to restore the Multiple Integrated Laser Engagement System (MILES) equipment to its original condition. Rather, the staff should use the existing change management process – coordinating through the Nuclear Security Working Group – to fully evaluate the pros and cons of this change to determine whether the MILES equipment configuration change would result in an overall enhancement to force-on-force (FOF) exercises. The staff should inform the Commission of the results of this review and does not need Commission approval to change the MILES gear unless a policy matter is identified. If the MILES equipment is to be restored, however, the staff has noted that "updates to responder training and controller guidance will be required to address the concerns that prompted the initial reprogramming of the MILES equipment." Consequently, any change to the MILES equipment configuration should only be made concurrent with the availability of the revised guidance.

With respect to unattended openings, in the near term, the staff should account for the realistic ability for specific opening configurations to be exploited when evaluating inspection findings and assessing licensee corrective actions. In the longer term, the staff should evaluate the NRC requirements for unattended openings through the same NRC working group that is being established to evaluate tactics and any changes should be evaluated through a formal change control process with stakeholder input.

The Commission supported the staff's commitment to several actions not requiring Commission approval. As such, the staff should:

1. Continue working with industry to review and reduce the number of extensive simulations used in developing and executing FOF scenarios by identifying, validating, and benchmarking mechanisms, such as the use of simulation software, to evaluate potential vulnerabilities that may be inappropriate for performance testing during an NRC-conducted FOF exercise;
2. Review and update the physical protection significance determination process;
3. Issue a generic communication to licensees to clarify the NRC's expectations regarding the implementation of compensatory measures; and
4. Enhance guidance, training, and inspection program documents in the effort to improve the realism and effectiveness of FOF exercises.

The staff should move forward with these improvements, including moving forward without delay on its planned generic communication and with high priority on its proposed actions to reduce the number of extensive performance simulations. If the staff proposes to alter, discontinue, or delay these actions, the staff should utilize existing agency mechanisms to keep the Commission fully and currently informed of such proposals. The staff should provide an information paper to the Commission, annually, providing the status of these actions.

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