



Enhancements to FOF Inspection Processes and Documentation

October 2015

Approval of COMSECY-15-0025 “Proposed Revision to the Notification Process for Force-on-Force Inspections”

On October 6, 2015, the Commission approved the staffs proposal to revise the notification to licensees of Force-on-Force (FOF) inspections from 8 to 12 weeks prior to the inspection, to a new period of 9 to 15 months prior to the inspection.

The approval of COMSECY-15-0025 provides an opportunity to re-align and enhance the FOF inspection preparation process to address some of the challenges the program has experienced during exercise scenario development, use of a dedicated insider, and target set inspection activities.

To accomplish this, NRC staff is reviewing potential updates to applicable FOF inspection procedures and internal guidance documents to support the revisions to the notification process. The following proposed revisions include:

- Inspection Notification Process
- Consolidated Information Request
- Security Risk Analyst
- Insider Selection
- Inspection Preparation Process
- Noticeable Program Enhancements

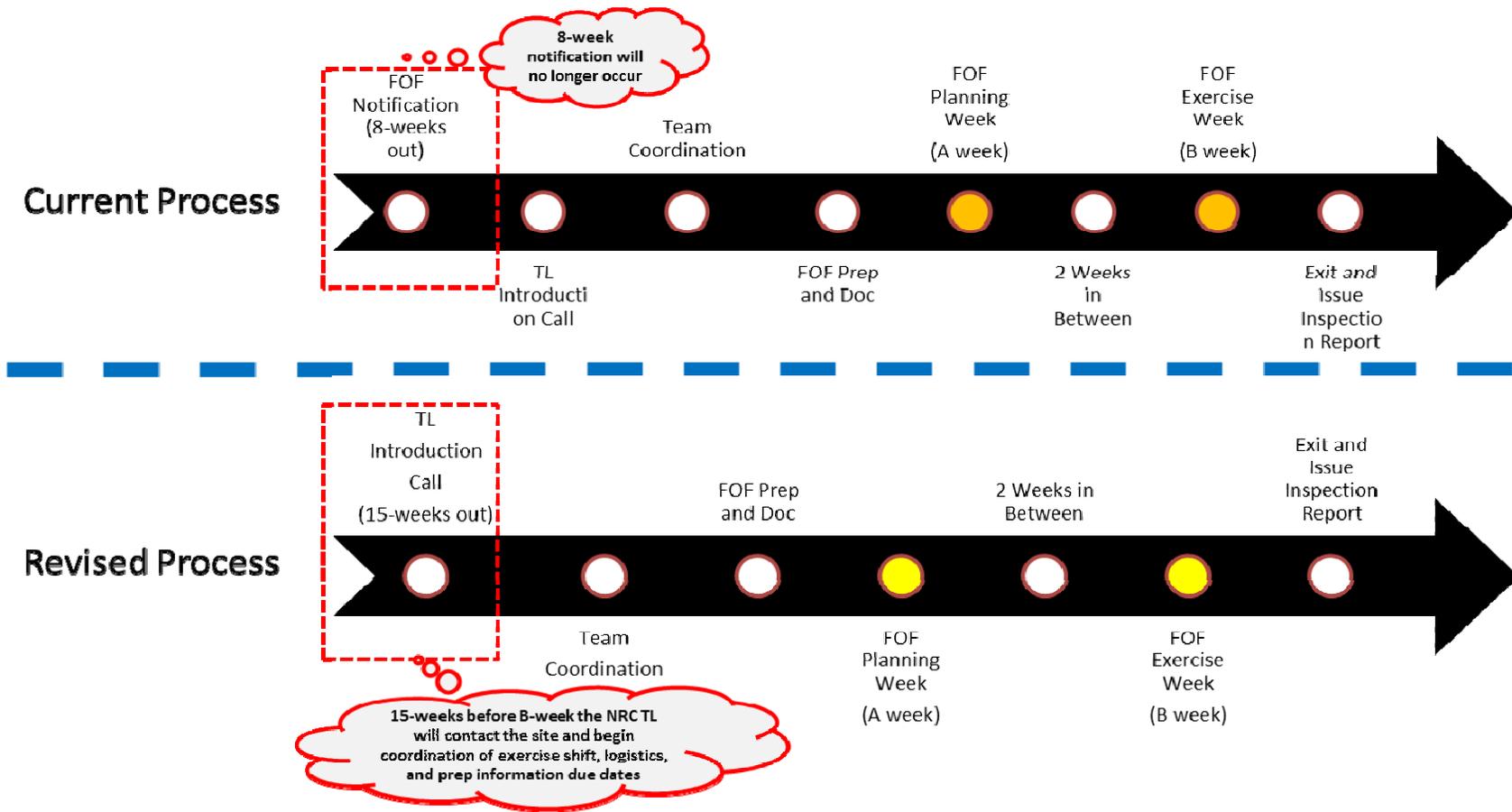
Key Positives

The proposed program revisions are key to ensure an enhanced NRC security inspection program. This will be accomplished through several initiatives to include:

- Efficiencies in the preparation process resulting in additional cost savings to licensees.
- Allows for earlier identification of potential control and safety concerns.
- Enhanced communication with NRC management on the inspection details at each site – This should lead to more credible and realistic scenarios resulting in a decrease in escalated items.

It is important to emphasize that the NRC is open to NRC, NEI and industry feedback on any new process and each will be critically and closely reviewed to ensure that continued adjustments and improvements can be accomplished.

FOF Inspection Process Overview



Notification Process

- Notification via annual Reactor Oversight Process (ROP) assessment letter (should take affect in March 2016) indicating the NRC inspection schedules. Not a separate site-specific notification at the 8-week timeframe.
- Inclusion of the FOF inspection schedule into the Reactor Process System (RPS).
- FOF Team Leader will conduct an inspection introductory call 15 weeks prior to exercise week. This call will cover the same topics as the current call conducted at 8 weeks.
- During the 15-week introductory call the Team Lead will communicate with the site which shift will participate in the FOF inspection.

Consolidated Information Request

Merge Enclosures 2 “Document Request List” and Enclosure 4 “Mission Planning Information Packet”

- Merging Enclosure 2 and 4 will eliminate redundant submittals thus reduce the amount of information requested.
- Requested information will be submitted to the NRC 10 weeks before exercise week. It is key to note that although the information will be received sooner it will not constitute an increase in preparation time but increase flexibility in preparation to accommodate the teams inspection schedule.
- This allows for a licensee to have an extended time period to assemble the requested information versus only 2 weeks.

Security Risk Analyst

Effective January 2016, the Security Risk Analyst (SRA) will no longer travel with the NRC FOF inspection team to the site.

- SRA's will continue to support the FOF team in the preparation and documentation portion of the FOF inspection.
- This will allow for the HQ SRA's to assist in the resolution of questions related to target sets by regional staff well before the sites scheduled FOF.
- Eliminates the perception of receiving multiple target set inspections.
- Provides the opportunity to increase consistency between each region through more effective reviews of the program.

Insider

Effective January 2016, a site staff member will no longer be chosen to act in the capacity of an insider.

The effort to obtain the appropriate inside information may be achieved in multiple ways, to include:

- The enhancements to the consolidated information request.
- Through the use of normally selected site trusted agents (which could include multiple staff such as the lead controllers and adversary controllers).
- Information may be provided by the NRC inspection team as required. It is key to note that **all** information will be communicated through the approval of the NRC Team Lead to ensure it is information that would meet the threshold of available inside information.
- Any method agreed upon between the NRC Team Lead and the appropriate licensee staff to obtain the information.

Preparation Process

Effective January 2016, NRC staff will implement the following process changes to their preparation portion of the FOF inspection.

- Prior to the FOF inspection planning week the NRC inspection team will develop a “Heads Up” briefing for NSIR management. The briefing should, if possible, include the following:
 - An overview of the techniques, tactics, and procedures it preliminarily intends to focus on during the inspection
 - Include any potential vulnerabilities identified.
 - The potential for new or additional control measures.
 - What previous target sets or locations will be used in the scenarios and why.
- Increased engagement and communication with the NRC Advisors and CAF Planner to ensure the validity and scope of techniques and tactics used during the inspection.
- There will be no change in preparation hours or assigned personnel. The hours will remain consistent with our current process.

Noticeable Program Enhancements

The above program enhancements will create a more informed process to ensure there is increased communication with NRC management related to planned scenarios, that scenarios are credible, are a realistic challenge to the protective strategy, and that the mock adversary force replicates, as closely as practicable, adversary characteristics and capabilities of the Design Basis Threat.

The below items are those that will be the most readily noticeable.

- Addition of FOF inspections in RPS. (resulting in increased flexibility for site activities)
- Conduct of 15-week Team Lead introductory call.
- SRA's not on site for the inspection.
- No selection of an Insider.
- Moving IDS testing from Thursday to Tuesday of planning week.
- Team Lead communication related to which shift is tested.

Current Process vs. Proposed Enhancements

Notification Process

Current

- **Sites notified of inspection by letter 8 weeks prior to Exercise Week.**
- **Team Lead conducts introductory call with site security manager shortly after notification letter.**
- **Tested shift selected by site and NRC selected team rotation.**

Proposed

- **FOF Inspection schedule will be included in the ROP assessment letters.**
- **FOF inspection schedule will be added into RPS.**
- **Tested shift and team rotation will be selected by the NRC Team Lead and communicated at the 15-week introductory call.**

Current Process vs. Proposed Enhancements

Information Request

Current

- **Enclosures 2 “Document Request List” and Enclosure 4 “Mission Planning Information Packet” submitted individually to NRC and CAF.**
- **Information request was due to the NRC 2 weeks prior to exercise week.**
- **Sites are only afforded approximately 2 weeks to compile the data.**

Proposed

- **Enclosures 2 and 4 will be combined into one enclosure resulting in less burden to the licensee.**
- **Information request will be submitted approximately NLT 10 weeks before exercise week.**
- **Sites will have up to the 15 months notification timeframe to assemble the data.**

Current Process vs. Proposed Enhancements

Security Risk Analyst

Current

- **SRA's travel to the sites for planning week.**
- **Perception that sites were being inspected multiple times for target sets.**
- **SRA's had limited preparation time in the office due to other travel requirements.**
- **SRA's had less time to review and assess the target set inspection process conducted by regional staff.**
- **SRA's incurred travel expenses for planning week.**

Proposed

- **SRA's will not travel to the sites for planning week.**
- **This should result in eliminating the perception of receiving multiple target set inspections.**
- **SRA's will have the ability to spend the scheduled time preparing for inspections.**
- **There will be increased time for SRA's to review and assess the target set inspection program.**
- **There will be little to no travel expense for planning week.**

Current Process vs. Proposed Enhancements

Insider

Current

- **The site would develop and provide a list of potential insiders to the NRC.**
- **NRC inspection team would select a specific person to function as an insider and sit with the CAF planner during planning week.**

Proposed

- **Site will not long need to develop a list of potential insiders. This will result in a small burden reduction.**
- **Information needed to plan missions will occur in several potential ways.**
 - **Use of the consolidated information package.**
 - **Use of trusted agents such as the lead controllers or adversary controllers.**
 - **Information at times may need to be provided by the NRC inspection team. This information will always be evaluated by the NRC Team Lead to ensure it meets the criteria of insider information.**

Current Process vs. Proposed Enhancements

Preparation Process

Current

- **Teams typically conduct up to 40 hours preparing for each inspection.**
- **The NRC inspection team has no interaction with SOCOM related to inspection preparation.**
- **The NRC inspection team has no interaction with the CAF related to inspection preparation.**

Proposed

- **Teams will continue to conduct up to 40 hours preparing for each inspection.**
- **SOCOM will participate in an in-office brief with the inspection team to include the SRA.**
- **The CAF will participate in an in-office brief with the inspection team to include the SRA.**
- **The NRC Team Lead will provide a “Heads Up” brief to NRC management about expected tactics, techniques, and procedures to be used and in an effort communicate any potential control issues.**