



Force on Force - Tactics, Techniques and Procedures Working Group Background, Tasks and Commitments, Findings & Recommendations

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Force on Force - Tactics, Techniques and Procedures Working Group

Agenda

- Background of the NRC Force on Force (FOF) Performance Inspection Program Assessment
- FOF Tactics, Techniques, and Procedures (TTP) Working Group Taskings:
 - Analyses
 - Findings
 - Recommendations
- Other Activities of Interest
- Next Steps



Background

Staff Requirements Memorandum (SRM) COMGEA/ COMWCO-14-0001 - FOF Lessons-Learned Review

- In February of 2014 the Commission Directed the NRC staff to undertake a lessons learned review of the Force-on-Force performance inspection program
- A working group was formed and completed the review
- The staff provided the Commission with options and recommendations based on its review. The staff also identified a number of commitments that did not require Commission action.



Background

SRM SECY-14-0088 Commission Direction:

1. 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, using a formal change control process with stakeholder input.
2. 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.
3. Provide to the Commission with recommendations regarding the need to continue its [FOF TTP WG] research and, if the study is complete, any revisions to be made to Composite Adversary Force tactics, techniques, and procedures.
4. Coordinate through the Nuclear Security Working Group to fully evaluate the pros and cons of implementing changes to the current configuration to the MILES used during NRC FOF performance inspections and if it would result in an overall enhancement to FOF exercises.
5. Evaluate the NRC requirements for unattended openings.



Background

SRM SECY-14-0088 Staff Commitments:

The Commission supported the staff's commitment to the following actions not requiring Commission approval:

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 (for evaluating the security significance of unattended openings);
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.



FOF TTP Working Group Actions

The FOF TTP Working Group was tasked with:

- Determining 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.
- Reviewing the NRC's requirements for unattended openings.
- Issuing a Regulatory Issue Summary on compensatory measures.



Adversary TTPs

Tasking:

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.

Analysis:

- Reviewed Intelligence reporting on adversary training and actual TTPs used
- Reviewed inspection reports from all four FOF inspection cycles to identify the TTPs used by the CAF in the NRC-evaluated performance tests and compared them to actual intelligence reporting
- Reviewed NRC guidance and inspection program documents to identify potential gaps
- Reviewed and analyzed licensee-developed FOF lessons learned (corrective action reports and FOF executive lessons learned presentations)
- Received briefings from internal and external subject matter experts on FOF topics
- Conducted two public meetings to receive input from the public and stakeholders
- Conducted a closed Federal Partners meeting to solicit input from agencies that conduct similar inspections



Adversary TTPs

Findings:

- NRC's DBT is consistent with actual terrorist TTPs
- The CAF TTPs are consistent with the NRC's DBT and actual terrorist TTPs.
- There are inconsistencies ~~and confusion~~ across multiple licensees regarding adversary TTPs employed during licensees' own drills and exercises.
- These inconsistencies are attributable to the absence of guidance regarding:
 - Mock adversary force training and qualification
 - Mission planning training and qualification
 - Controller and simulation training and qualification
 - Post-exercise critiques
 - An NRC program for sharing FOF operational experience information



Adversary TTPs

Recommendations:

- Develop mock adversary force training and qualification guidance
- Improve controller/simulation guidance and include training and qualification guidance
- Develop a user need to develop a standard reference guide for weapons and explosives characterization and effects
- Develop guidance for post-exercise critiques
- Develop mission planning training and qualification guidance for use by both the NRC and licensees
- Develop a program for sharing NRC FOF operational experience information
- Update and ensure consistency in all NRC guidance
- Enhance the FOF disputed item resolution (escalation) process



Unattended Openings

Tasking:

Evaluate the NRC's requirements for unattended openings (UAOs) and account for the realistic ability for specific opening configurations to be exploited when evaluating inspection findings and assessing licensee corrective actions.

Analysis:

- Reviewed past inspection findings dealing with UAOs.
- Reviewed standards applied by other federal agencies and the private sector against the threat environment.
- Developed options for addressing UAOs.



Unattended Openings

Findings:

- The Working Group found no basis to support a change to the NRC's UAO requirements.
- The Working Group found that the significance determination process (SDP) for UAOs was too subjective.

Recommendations:

- Revise SDP to remove subjective factors and improve the repeatability of UAO SDP outcomes.
- Provide credit for existing barriers and detection systems (including those implemented voluntarily).

Status

- Completed: SDP revision issued on October 26, 2015



Compensatory Measures

Tasking:

Issue a generic communication to licensees to clarify the NRC's expectations regarding the implementation of compensatory measures following the identification of security vulnerabilities during FOF exercises.

Analysis:

- Reviewed past licensee actions regarding compensatory measures.

Findings:

- Staff identified that licensees were applying immediate compensatory measures in certain cases where such measures are not required under NRC regulations and guidance.

Recommendations:

- Issue RIS, "Clarification on the Implementation of Compensatory Measures for Protective Strategy Deficiencies or Degraded or Inoperable Security Systems, Equipment, or Components."

Status

- In-Progress: RIS will be issued for public comment in February of 2016



Other Activities of Interest

1. FOF Notification Schedule Change – FOF notifications are now under the ROP schedule.
2. Inside information provided to CAF – licensees are no longer asked to identify a dedicated “insider” to support the FOF inspection.
3. Project AIM – NEI Letter
4. NEI Performance Metrics White Paper
5. Office of Nuclear Security and Incident Response White Paper review process.



Next Steps

- Evaluate stakeholder feedback
- Finalize recommendations for response to SRM SECY-14-0088
- Present final recommendations NRC management NLT January 31, 2016