

# **Status of Staff Assessment in Response to SRM-SECY-16-0073**

March 2, 2017

Office of Nuclear Security and Incident Response

Division of Security Operations  
Division of Security Policy



# Agenda

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- Objectives
- Background
- Assessment Process
- Potential Pilot Programs
- Vulnerability Assessments
- Crediting Operator Actions and FLEX equipment
- Crediting Law Enforcement
- Next Steps
- Comments and Questions

# Objectives

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- Provide an opportunity to solicit and receive stakeholder feedback
- Present an overview of staff efforts
- Present the status of security baseline inspection program assessment
- Discuss the path forward

# Background

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SRM-SECY-16-0073, “Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088,” October 5, 2016

- Avoid a fundamental redesign of the program
- Limited to areas most likely to yield improvements and efficiencies
- Staff should include in its evaluation:
  - Protective strategy evaluation using vulnerability assessments
  - Crediting operator actions and the use of FLEX equipment
  - Crediting law enforcement to establish coping time for security events
- Legal analysis for NRC observation of licensee FOF vice conducting the exercise
  
- Staff response to the Commission - October 2017

# Assessment Process

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- Focused on power reactor security baseline inspection program
- Internal and external stakeholder feedback
- Detailed review of security baseline inspection program documents
  - Inspection Manual Chapter 2201
  - Inspection Procedure 71130
- “high assurance” is equivalent to “reasonable assurance”

# Stakeholder Feedback

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- NEI Letter (ML17046A218) – Supports the NRC Commission direction in SRM
  - Improve scheduling coordination between Regional and HQ inspectors
  - Removal of redundant inspection items
  - Revise FOF inspection schedule for improved efficiency
  - Developing a proposed methodology for crediting operator actions (OA), FLEX equipment and law enforcement (LE) response
  - Suggested pilot programs

# Stakeholder Feedback

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- **Staff Review and Input**

- Review IMC 0307, “Reactor Oversight Process Self-Assessment Program” findings
- Working Group Sessions – Regional and HQ staff identification of areas where efficiencies may be gained
- Programmatic oversight of security baseline inspection program including FOF
- Identification of current requirements for crediting OA, FLEX equipment and LE response
- Suggested pilot programs

# Inspection Program Review

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- Review of IMC 2201 and IP 71130 to include evaluation of:
  - Inspection periodicity
  - Redundant inspection items
  - Minimum sampling ranges for each IP
  - Improve inspection schedule coordination
- Assessment Team
  - Security Inspectors from each region
  - Headquarters staff from policy, oversight and inspection branches



# Potential Pilot Programs

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- Reduction of timeout's during FOF exercise
- Reduce the number of FOF exercises per inspection
- Revise FOF inspection schedule per attachment 2 of NEI letter (ML17046A218)
- Perform a defense-in-depth evaluation in lieu of second FOF exercise per attachment 3 of NEI letter (ML17046A218)

# Vulnerability Assessments

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- Evaluation of expanded use of vulnerability tools to improve efficiency and effectiveness of licensing and inspection activities
  - Computer based products
  - Manual calculations
  - Results are currently used as supplemental information to justify security plan changes

# Operator Actions and the Use of FLEX Equipment

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- Current Requirements
  - Statement of Consideration, Power Reactor Security Requirements, Final Rule, 74FR13926, 13960 (March 27, 2009)
  - Regulatory Guide 5.81, Target Set Identification and Development for Nuclear Power Reactors
    - Controlled document – Security Related Information
    - Section 6.4.1 – Preventive Actions – in-depth review of the evaluation criteria
- NEI SRM Response letter
  - Industry is developing a guidance document with a proposed assessment methodology

# Crediting Law Enforcement Response

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- Current Requirements
  - NRC Commission Policy - Statement of Consideration, Power Reactor Security Requirements, Final Rule, 74FR13926, 13940 (March 27, 2009)
  - Potential options
    - Use of integrated response (IR) framework as an evaluation tool for law enforcement response
    - Utilize coping time as part of a licensee's protective strategy
- NEI SRM Response letter
  - Industry is developing a guidance document with a proposed assessment methodology

## Next Steps for Staff Response to SRM

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- Assessment of security baseline inspection program procedures
- Feasibility review of proposed pilot programs and efficiency recommendations
- Coordination with stakeholders
- Submission of staff response to the Commission

# Questions

# BACK-UP SLIDES

# Summary of Current Staff Actions

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- Annual reactor oversight process (ROP) self assessment
- Clarification of staff position regarding armed security officer (ASO) response timelines
- Revision to the MILES equipment contract
- Implemented use of reactor program system (RPS) to streamline the FOF exercise notification process
- Data collection to support oversight and alignment of regional consistency while implementing IP71130.14<sup>1</sup>
- Intrusion detection system challenge testing during IP71130.03<sup>2</sup>
- Use of force interviews during IP71130.03

<sup>1</sup> IP71130.14 – “Review of Power Reactor Target Sets”

<sup>2</sup> IP71130.03 – “Contingency Response, Force-on-Force Testing”