

Potential Options for Force-on-Force Inspection Procedure

SRM-SECY-16-0073, "Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088" (ADAMS Accession Number ML16279A345), directed the NRC staff to conduct an assessment of the security baseline inspection program, including the Force-on-Force (FOF) program. In response to the Commission's direction, the NRC staff is evaluating three potential options regarding revisions to the FOF inspection program¹. These three potential options are summarized in Table 1 of this document. The NRC staff has not decided on a preferred option to submit to the Commission and implementation of any of these options, other than Option 1, will require Commission approval.

As this document has not been subject to all levels of NRC management review, it may be subject to revision before the staff presents the options to the Commission in a SECY paper. The SECY paper is currently scheduled to be provided to the Commission in October 2017.

The NRC staff is making this information public prior to the NRC public meeting to allow stakeholders to review the material in advance, facilitate discussion during the meeting, provide stakeholders an opportunity to submit written comments to the NRC, and further the NRC staff's understanding of stakeholder views on these potential options. In particular, the NRC staff is interested in stakeholder views on:

- Potential impact on resources needed to support FOF inspections for each option.
- How evolutions (e.g., defense-in-depth evaluations, performance evaluation of licensee conducted FOF exercises), other than NRC conducted FOF exercises, would be conducted.
- Addressing performance deficiencies that are identified during a defense-in-depth (DID) exercise.

The NRC staff is prepared to discuss these options and associated issues at the upcoming public meeting that is scheduled for July 12, 2017.

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¹ The FOF inspection program is conducted in accordance with Inspection Procedure (IP) 71130.03 "Contingency Response – Force-on-Force Testing".

TABLE 1

	Option 1	Option 2		Option 3
		A	B	
	Maintain 2 NRC Conducted FOF Exercises	One NRC Conducted FOF Exercise + Defense in Depth (DID)	One NRC Conducted FOF Exercise + one DID Based on NEI Proposal (compiled from January and May 2017 input)	One NRC Conducted FOF Exercise + Evaluate a Licensee Exercise
Inspection Procedure	IP71130.03	Modified IP71130.03	Modified IP71130.03 (NRC Led) New Inspection Procedure (for Licensee DID demonstration)	- Modified IP71130.03 (NRC Led) - New Inspection Procedure (to evaluate a licensee led exercise)
Planned Inspection Activity	<ul style="list-style-type: none"> • Conduct 2 NRC FOF exercises • Implement Enhancements to the existing program: <ul style="list-style-type: none"> - Elimination of IP redundancies - Add 1 week between A and B weeks - Embed CAF director with NRC for A week - CAF Team onsite 1 week earlier 	<ul style="list-style-type: none"> • Implement Enhancements (from Option 1) • Plan 2 NRC FOF exercises. • Conduct 1 NRC FOF exercise. If 1st exercise is effective, then 2nd exercise will be a DID. <ul style="list-style-type: none"> ○ The DID exercise will be a truncated version of the second FOF exercise. • If the 1st exercise is indeterminate or ineffective, then the 2nd exercise will be the full NRC FOF exercise. 	<ul style="list-style-type: none"> • Implement Enhancements (from Option 1) • Conduct 1 NRC FOF exercise • Conduct 1 DID exercise 	<ul style="list-style-type: none"> • Implement Enhancements (from Option 1) • Conduct 1 NRC FOF exercise • Evaluate 1 Licensee conducted FOF exercise for Protective Strategy Implementation
Evaluation and Enforcement Process	The inspection evaluation using the Significance Determination Process (SDP) is based on the outcome of the 2 FOF exercises.	The inspection evaluation using the SDP is based on the outcome of either: 2 FOF exercises; or 1 FOF and 1 DID exercise.	The inspection evaluation using the SDP is based on the outcome of the FOF and DID exercises.	The inspection evaluation using the SDP is based on the outcome of the NRC FOF exercise and a performance evaluation of the licensee's FOF exercise.