




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 9, 2018

SECRETARY

MEMORANDUM TO: Margaret M. Doane  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary 

SUBJECT: STAFF REQUIREMENTS – SECY-17-0100 – SECURITY  
BASELINE INSPECTION PROGRAM ASSESSMENT RESULTS  
AND RECOMMENDATIONS FOR PROGRAM EFFICIENCIES

The Commission has approved the staff's recommended Option 3, to modify the force-on-force (FOF) inspection program to include one NRC-conducted FOF exercise and an enhanced NRC inspection of a licensee-conducted annual FOF exercise. Option 3 should be put in place no sooner than the beginning of the next triennial security inspection cycle.

The staff should assess whether there exist any obstacles to the acceptance by NRC of the use of licensee MILES equipment in both the NRC-conducted and the licensee-conducted FOF exercise and, if none, should adopt this practice.

The staff should discontinue any work to develop rulemaking options for the integrated response program. Also, the staff should not pursue any proposal to end all NRC-conducted FOF exercises at nuclear facilities absent further direction from the Commission.

The staff should develop and submit a framework for a revised security inspection program to the Commission for review and approval within 6 months from the date of this SRM. The paper transmitting the proposed framework should include a discussion of how the new inspection regime would address an indeterminate exercise, including how the staff would determine what, if any, additional inspection activities are warranted to ensure NRC can still meet its oversight responsibilities even in the case of an indeterminate exercise outcome. The paper should also include recommendations for providing credit for a broader set of operator actions, including the use of FLEX equipment, and providing credit for response by local, State, and Federal law enforcement in our security inspection program.

The staff's paper should take into consideration that the NRC has already codified its recognition of "the reality that in an actual emergency, state and local government officials will exercise their best efforts to protect the health and safety of the public" in 10 CFR 50.47(c)(1)(iii)(B).

cc: Chairman Svinicki  
Commissioner Baran  
Commissioner Burns  
Commissioner Caputo  
Commissioner Wright  
OGC  
CFO  
OCA  
OPA  
ODs, RAs, ACRS, ASLBP (via e-mail)  
PDR