

Inspection Procedure Assessment Summary and Outline of Proposed Changes

Inspection Procedure (IP):	71130.03, "Contingency Response – Force-on-Force Testing"
Inspection Procedure Lead:	Stacy Prasad
Date Completed:	10/05/2018
Estimated Hours to Complete Review:	6

1. Results and assessment of review of IMC 0308, ROP basis document review

Credit is being given for this item because of recent IP effectiveness initiatives associated with the security baseline inspection program assessments (ML17223A279).

2. Results and assessment of review of any applicable changes to PIs

Credit is being given for this item because of recent IP effectiveness initiatives associated with the security baseline inspection program assessments (ML17223A279).

3. Results and assessment of review of any applicable changes to Rules and STSs

Credit is being given for this item because of recent IP effectiveness initiatives associated with the security baseline inspection program assessments (ML17223A279).

4. Results and assessment of review of recent Operating Experience

Credit is being given for this item because of recent IP effectiveness initiatives associated with the security baseline inspection program assessments (ML17223A279).

5. Results and assessment of review based on RRPS data

Adverse trends or outliers noted: Yes

Contingency Response – Force on Force Testing is a triennial inspection. The Summary of PIM Findings for calendar years (CY) 2013-2017 shows the number of findings identified were 24 in CY 2013, 22 findings in 2014, 27 findings in CY 2015, 20 findings in CY 2016 and 9 findings in CY 2017. Of the 102 findings issued, 101 were identified by the inspector (99%). Of the 102 findings, 98 was a Green NCVs, 1 were Green FIN, and 3 were White NOVs. During the 5 years, the findings per 1,000 hours was 1.9 and the inspector identified per 1,000 hours was 1.5. Reported hours show 7,276 hours (5-year average) of the total allotted of 9,194 hours per year. The IP currently has an inspection effort of 393 hours (note: the IP was revised in CY 2017 to adjust the resource estimate to reduce the target range for completion from 435 hours). A review of the average inspection hours for the CY 2013-2017 review identifies 87.56 hours under the hours allotted per inspection. Additionally, the inspection hours since the CY 2017 IP adjustment identifies 68.25 hours under the hours allotted per inspection. This IP is consistently underutilizing the resources allotted.

6. Feedback Forms

Credit is being given for this item because of recent IP effectiveness initiatives associated with the security baseline inspection program assessments (ML17223A279).

7. Other Considerations

Credit is being given for this item because of recent IP effectiveness initiatives associated with the security baseline inspection program assessments (ML17223A279).

8. Results of discussions with regions

The regions agreed that this IPs underutilized its resources and could be reduced. They also agreed that it would be premature to reduce the DIE for this inspection before the working group revised the IP based on the results of the SRM to SECY-17-0100.

Recommendations

On October 4, 2017, SECY-17-0100, "Security Baseline Inspection Program Assessment Results and Recommendations for Program Efficiencies," (ML17223A279) was sent to the Commission to provide the results of the staff's assessment of the security baseline inspection program, including the force-on-force (FOF) program.

In September 2018, the Commission completed their vote to approve the staff's recommendation to modify the force-on-force (FOF) program to include one NRC conducted FOF exercise and an enhanced NRC inspection of a licensee-conducted annual FOF exercise. On October 9, 2018, staff was issued SRM-SECY-17-0100, "Security Baseline Inspection Program Assessment Results and Recommendations for Program Efficiencies." To date, NSIR has developed a Task Force to respond to the Commission's SRM.

NSIR and the regions are in alignment to decrease the resource estimate by at least 68 hours (from 393 to 325 hours); however, we recommend holding off changes to the resource estimate until the SECY-07-0100 working group revises the IP.