

2021 FOF Inspection Activities

2/3/2021

Landscape

- January 14, 2021 meeting discussion:
 - Issue an Addendum to IP 71130.03 to provide guidance for use of existing framework with special protocols to mitigate COVID-19 impacts
 - Update IP 92707 to include e.g., follow-on actions to improve assessment, and retain as fallback option in case licensee demonstrates hardship
 - Develop force-on-force (FOF) Hardship Criteria to be applied consistently
 - Begin inspections in March 2021, or at discretion of sites if sooner is desired and conditions permit

Current FOF Approach

- For schedule certainty, all plants have confirmed Inspection Procedure (IP) 71130.03 inspection dates, which includes a confirmed planning week and exercise week.
- NRC will plan to use IP 71130.03 with Addendum 5, Interim Guidance Related to the Implementation of Inspection Procedure 71130.03, Contingency Response Force-on-Force Testing, during the COVID-19 PHE.
- When conditions do not permit use of IP 71130.03, due to hardship, NRC will use revised IP 92707, “Security Inspection of Facilities Impacted by a Local, State, or Federal Emergency Where the NRC’s Ability to Conduct Triennial Force-on-Force is Limited.”

Criteria for Use of IP 71130.03 or IP 92707

- Lessons Learned from 2020, industry input and NRC experience were used to develop the criteria
- Determine the appropriate FOF inspection to be conducted based on a review of COVID-19 considerations such as those discussed below.
 - State, local, and/or site conditions that may have an unreasonable burden on the licensee from supporting their scheduled inspection utilizing IP 71130.03 with the COVID-19 PHE protocols listed in Addendum 5.
 - This criteria would review how the scheduled inspection is impacted due to positive COVID-19 tests, quarantining, or restrictions that may impact staffing and/or individuals traveling to the site, etc.
 - COVID-19 protocols in place and what impact they may have on site's ability to staff positions (e.g., Central Alarm Stations, Secondary Alarm Station, Ready Room(s), and/or Bullet-Resistant Enclosures) in a safe manner to abide by site COVID-19 restrictions (i.e., social distancing).
 - Regional/Resident Inspector coordination of site conditions
 - Site-specific discussions and input from scenario development during planning week
- Decision made at Branch Chief level to ensure consistency (email documentation); appeals to Division Director, and Office Director

Use of IP 71130.03 or IP 92707

Step 1	At the 30 day window (prior to planning week) – TL contact site or site contacts NRC and provides update
Step 2	At 14 day mark (prior to planning week) – site will report COVID-related conditions to NRC
	Conditions are unsuitable (COVID-related): NRC would plan to forgo visiting site for A Week; plan to use the 92707 during site B Week. (Note: If conditions are still unsuitable prior to B Week, NRC would reschedule 92707)
	Conditions are reasonable: NRC will arrive at A Week; plan for 71130.03 modified

Use of IP 71130.03 or IP 92707 (cont'd)

Step 3	If following planning week, it is determined site unable to use CAS/SAS, BREs, or alternatives due to COVID-19, (14 days prior to return for B Week) NRC will decide if appropriate to use 92707
	If during planning week, scenario can be run safely, NRC will return for B Week to use 71130.03 modified
Step 4	If conditions change from A to B Week (COVID-related):
	If cannot use 71130.03 due to COVID, revert to use 92707 for B Week
	If site A or B Week cannot be used for 92707 due to COVID, NRC will look to reschedule later in calendar year or 2022

Scenario-Specific Information During A Week

- Considerations should be given to scenario-specific information that may impact the licensee's ability to perform the given FOF exercise.
- This should include the use of lessons learned from conducting the IP 92707 inspections in 2020, including the use of compensatory measures for staffing issues, the use of "PODS" for staffing during the planned exercise, temporary BREs, and the use of time-outs to reposition exercise participants.

Scenario-Specific Information During A Week (cont'd)

- The NRC Team Lead should coordinate with the licensee to:
 - determine which participant positions could be pre-positioned in a manner to support execution of the exercise and mitigate participant exposure
 - determine if there are positions that would not be necessary to staff during the exercise (these would be positions that are determined not necessary for the implementation of the licensee strategy based on the exercise selected)

Scenario-Specific Information During A Week (cont'd)

- establish where simulations should be considered for instances where exercise participants cannot achieve social distancing
- consider the use of time-outs to reset/reposition response force personnel in an exercise to reduce the overall footprint of the inspection activity
- make every effort to identify areas of potential close contact of exercise participants, and work with the licensee on mitigation techniques in these instances

Next Steps

- Continue staff training on IP 71130.03 implementation with Addendum 5 considerations; IP 92707 revisions for sample expansion and performance deficiency assessment
- Provide written guidance to inspectors outlining hardship criteria and use of IP 71130.03 and IP 92707
- Begin using IP 71130.03 (with special protocols to mitigate COVID-19 impacts) or revised IP 92707 (in hardship cases) as early as February 2021

Backup Slides

71130.03 Path Forward

- Implement strategies to address COVID-19 considerations
 - Run one exercise and use existing SDP for one exercise
 - Reduce time on-site by conducting debriefs, entrance and exit briefings remotely
 - Minimum number of site personnel will be used during the conduct of the exercise
 - Limit time on site to minimum necessary to conduct inspection
 - Use social distancing/facial coverings
- Infrastructure
 - Use NRC-owned MILES
 - Use JCAF/CAF for adversary force and limit to necessary attendees

Inspection Structure (2 Weeks)

- Planning week
 - Protective Strategy Briefing
 - Tabletop Drills
 - Site (Owner Controlled Area/Protected Area/Vital Area/Target Set) Tours
- Exercise week
 - Matrix Review
 - Exercise Briefings; Safety, Controller, Adversary, Player & On-Duty
 - Exercise
 - Use the minimum number of members of the response force and the mock adversary team sufficient to execute the scenario being tested
 - a credible, realistic and thorough test of a site's protective strategy
 - evaluates the key security program performance elements bounded by the DBT
 - provides scenario controls and exercise controllers
 - tests responders in BREs with appropriate protective measures
 - Management Critique

Updated 92707 Path Forward

➤ One week

- Evaluation
 - Limited scope drills not screened through FOF SDP
 - Minimal increase to number of exercise participants (i.e., CAS or SAS, RTL)
 - Follow-up action based on performance
 - Performance issues screened through baseline SDP
- Implement strategies to address COVID-19 considerations
 - Reduce time on-site by conducting debriefs, entrance and exit briefings remotely
 - Minimum number of site personnel will be used during the conduct of the exercise
 - Utilize the COVID-19 lessons learned under IP 92707
 - Use social distancing/facial coverings
- Infrastructure
 - Use licensee-owned MILES
 - Use licensee-managed mock adversary force and limit to necessary attendees