

(U) Integrated Response Program: History, Status, and Lessons Learned

(U) This enclosure provides a history of the Integrated Response Program at nuclear power reactor sites (the industry), describes the program's current status, and provides lessons learned. The Integrated Response Program is focused on preparing and coordinating law enforcement tactical team response to effectively and efficiently support licensees' actions to prevent or mitigate offsite radiological consequences during a hostile action-based event. The U.S. Nuclear Regulatory Commission (NRC) staff considered lessons learned from the Integrated Response Program when developing the reasonable assurance of protection time (RAPT) and security bounding time (SBT) concepts.

(U) This enclosure provides the semiannual update of the status of the Integrated Response Program (WITS 201300108) in accordance with the Staff Requirements Memorandum (SRM) for COMSECY-13-0005, "Integrated Law Enforcement Response at Nuclear Power Plants," dated June 4, 2013 (see Agencywide Documents Access and Management System (ADAMS) Accession No. ML13155A576).¹

(U) As noted in the Recommendations section of the cover SECY paper, the staff proposes that this update serve as the staff's final update to the Commission on integrated response in order to focus the staff's efforts on the implementation of the RAPT and SBT concepts in the cover SECY paper.

(U) The level of Integrated Response Program activity dropped significantly between August 2017 and November 2019. The FBI and NRC discontinued development of the CRT in August 2017. In September 2017, the FBI and NRC completed one limited exercise. In 2019, the FBI communicated to the NRC staff its intent to conduct one Integrated Response limited exercise per year. The first limited exercise under the FBI's renewed effort was completed in January 2020. The staff proposes to communicate future Integrated Response limited exercise activities using the agency's routine reporting mechanisms, such as One-Week Look Aheads and NRC Daily Notes.

(U) History of the Program

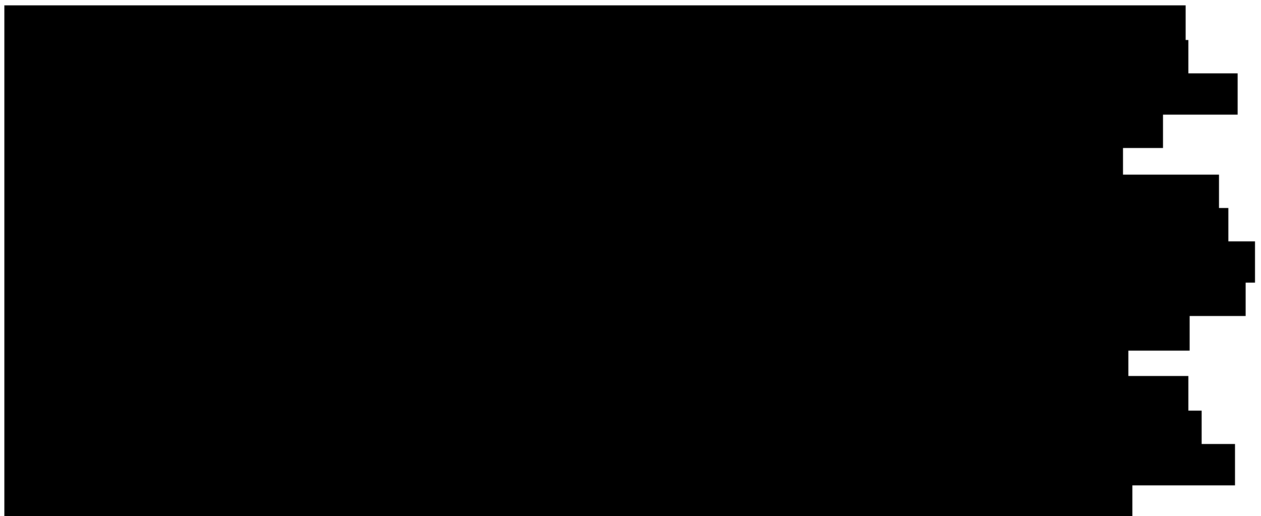
(U) In Supplement 1 (non-public) to SRM-SECY-05-0218, "Supplemental to SRM-SEC-05-0218, Semiannual Threat Environment Review," dated June 30, 2006, the Commission directed the staff to establish a consistent and sustainable program for integrating law enforcement tactical responses at nuclear power plants. From 2005 through 2007, the U.S. Department of Homeland Security (DHS) led a comprehensive review process in partnership with the FBI, the Organization of Agreement States, the Nuclear Sector Coordinating Council, and the U.S. Coast Guard. Through the comprehensive review process, DHS and its partners assessed the capabilities of nuclear power plants and Federal, State, and local government

¹ (U) As described in COMSECY-13-0005, the Integrated Response Program includes the following four elements: (1) site-specific Integrated Response Plans approved by the Federal Bureau of Investigation (FBI), which identify local, State, and Federal law enforcement organizations, including their corresponding roles and responsibilities and resources, that can be made available to NRC-licensed facilities in response to adversary events; (2) a contingency response tool (CRT), which is a navigational and response-planning tool for use by the tactical response team(s) to facilitate mission-specific tactical maneuvers within a specific site design/layout; (3) tabletop exercises, which validate the Integrated Response Plans based on participation of law enforcement entities that would be called upon to provide any necessary resources; and (4) limited exercises, which focus on mission understanding, communications, and self-guided navigation by tactical law enforcement responders at the site.

(U) agencies to enact coordination, planning, prevention, and response actions to protect against a hostile action-based event and to protect the public from the consequences of such an event. On July 25, 2008, DHS provided the NRC staff with a Safeguards Information copy of the Final Comprehensive Review Report for Commercial Nuclear Reactors and Associated Facilities, and the staff provided a copy to the Commission, as discussed in the Note to Commissioners' Assistants, dated August 21, 2008 (ADAMS Accession No. ML082341059). The Final Comprehensive Review Report summarized the information found within site-specific reports and provided analyses regarding potential enhancements identified for the nuclear sector. In this report, DHS sorted potential enhancements into seven categories: (1) perimeter security; (2) law enforcement patrol and surveillance; (3) maritime security; (4) emergency management; (5) communications; (6) bomb squad; and (7) tactical take-back.



(U) From 2008 to 2011, staff from DHS, FBI, and NRC conducted integrated response tabletop and full-scale (i.e., combat simulation) exercises at three sites: Limerick Generating Station in 2008, Donald C. Cook Nuclear Plant in 2010, and Indian Point Energy Center in 2011. To maximize the training value of the full-scale exercise, the FBI added a limited exercise prior to the full-scale exercise at Indian Point. The purposes of the limited exercise were to provide law enforcement participants with opportunities to familiarize themselves with: (1) the CRT and its utility in planning onsite tactical missions; (2) the types of missions the licensee would likely ask them to conduct during an attack; and (3) the plant environment itself. The limited exercise at Indian Point allowed for familiarization prior to the full-scale exercise in a simulated combat environment. Lessons learned from planning and conducting the integrated response exercises are documented in COMSECY-13-0005, "Integrated Law Enforcement Response at Nuclear Power Plants," dated February 7, 2013 (ADAMS Accession No. ML12305A408).



[REDACTED]

[REDACTED]

(U) Status of the Integrated Response Program

[REDACTED]

² [REDACTED]

³ (U) For further information on Integrated Response Plans, see the Note to Commissioners' Assistants, "Status of the Integrated Response Program," dated June 20, 2016 (ADAMS Accession No. ML16161A346).

⁴ (U) The staff provides support consistent with the Commission direction in SRM-SECY-05-0218 and SRM-COMSECY-13-0005, and the NRC and FBI's "Memorandum of Understanding Regarding Nuclear Threat Incidents Involving NRC Licensed Facilities, Materials, or Activities," Federal Register, Vol. 65, No. 95, pages 31197-98, dated May 16, 2000.

[REDACTED]

(U) Lessons Learned from Integrated Response

[REDACTED]

[REDACTED]

[REDACTED]

(U) In summary, experience with the Integrated Response Program has shown that proper training, familiarization, and the conduct of realistic exercises are key to ensuring the effectiveness of law enforcement response to support nuclear power plant readiness to protect against threats at plants. Exercises are also essential for realizing the full benefit of the administrative tools developed during the Integrated Response Program, such as integrated response plans and CRTs, so that law enforcement would have opportunities to train with those tools prior to an actual event.

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