



U.S. Nuclear Regulatory Commission
**34th ANNUAL REGULATORY
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MARCH 8-10, 2022

PREPARING FOR
TOMORROW

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Security Inspections During Periods of Site Inaccessibility





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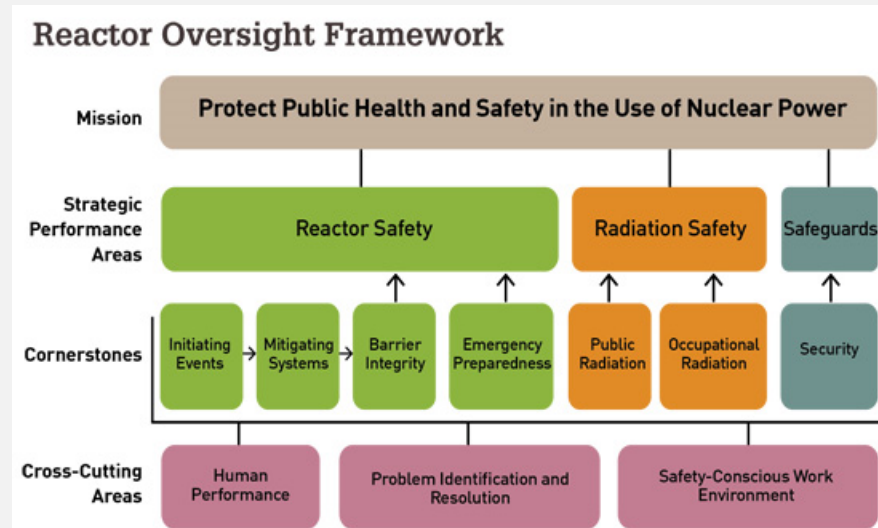
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Prudent Regulatory Oversight in a Challenging Environment

- The COVID-19 public health emergency created a need to adapt across all cornerstones, including Security, to maintain effective oversight.
- Baseline security inspections posed unique challenges that required inspector agility, forward thinking, and cooperation.





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Challenges

- Performance-based activities
- Information sensitivity
- Force-on-force inspections
- Some remote inspection techniques not suitable for security inspections
- Inspector presence on site





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Adapting to a Hybrid Inspection Environment

- What can be done remotely and what requires some level of inspector presence on site?
 - Example: “Verify that the licensee implementing procedures for vehicle search... describe areas of the vehicle to be searched...” vs. “Verify that the licensee conducts vehicle searches...in accordance with regulations...”
- What items are more prudent to complete on site?
 - Example: “Verify that the licensee’s reviewing official reviews and evaluates all of the background information required by 10 CFR 73.56 in making Access Authorization decisions...”



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Adapting to a Hybrid Inspection Environment

- Can fewer inspectors be used for onsite visits to limit personnel exposure?
- Can frequencies for completing inspection procedures be leveraged to safely complete onsite inspection procedure requirements at a later date?



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Force-on-Force Inspections

- Particularly unique due to the number of NRC staff and licensee personnel involved
- Adapted the program to support two different inspection formats depending on COVID-19 conditions
- Permitted flexibilities in licensee-conducted drills and exercises to encourage requalification and validation of protective strategy effectiveness





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Lessons Learned

- Inspector presence and in-person interactions are vital to the long-term health of the security baseline inspection program.
- Clear and deliberate communication is important in a hybrid environment.
- Some remote techniques did not provide the most efficient method for sample completion.





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Questions?

- For further questions, contact Jared Justice at jared.justice@nrc.gov