



# **POLICY ISSUE**

## **(Information)**

July 8, 2022

SECY-22-0066

FOR: The Commissioners

FROM: Daniel H. Dorman  
Executive Director for Operations

SUBJECT: CALENDAR YEAR 2022 TRIENNIAL FORCE-ON-FORCE INSPECTION  
PROGRAM STATUS UPDATE AND LESSONS-LEARNED

PURPOSE:

This paper provides a status update on the U.S. Nuclear Regulatory Commission's (NRC) triennial force-on-force (FOF) inspection program and the results of a lessons-learned review of temporary modifications to the program implemented during the coronavirus disease 2019 (COVID-19) public health emergency (PHE). Although the NRC conducts FOF inspections for all licensees for which the design-basis threat (DBT) applies (i.e., operating nuclear reactors and Category I fuel facilities), the focus of this paper is on the implementation of the FOF inspection program at operating nuclear reactors. This paper is submitted to satisfy the status update requirements described in SRM-SECY-14-0088<sup>1</sup> in which the Commission tasked the staff to provide annual updates on efforts to reduce artificialities, to enhance realism, and to enhance the effectiveness of the FOF inspection program. The annual update frequency was later modified in SRM-SECY-16-0009<sup>2</sup> to a triennial frequency as part of an agencywide, efficiency-focused, reprioritization and re-baselining effort. The last substantive update was

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<sup>1</sup> SRM-SECY-14-0088, "Proposed Initiative to Conduct a Lessons-Learned Review of the NRC Force-on-Force Inspection Program in Response to COMGEA/COMWCO-14-0001," dated December 14, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14353A433) (not publicly available).

<sup>2</sup> SRM-SECY-16-0009, "Recommendations Resulting from the Integrated Prioritization and Re-Baselining of Agency Activities," dated April 13, 2016 (ADAMS Accession No. ML16104A158).

described in COMSECY-19-0006.<sup>3</sup> In accordance with the Commission's direction in SRM-SECY-17-0100,<sup>4</sup> COMSECY-19-0006 provided a proposed inspection framework to the Commission that, if approved, would transform the FOF inspection program from its current two NRC-conducted exercises structure into one NRC-conducted exercise and an enhanced inspection of a licensee-conducted exercise. Accordingly, the staff is providing the Commission a status update on the NRC's implementation of the triennial FOF inspection program covering calendar year (CY) 2019 through the present. This paper does not address any new commitments or resource implications.

### SUMMARY:

FOF inspections serve as a capstone evaluation of a licensee's ability to use their security resources to detect, assess, and respond in an integrated fashion to a simulated threat. Because of the continued impact of COVID-19 variants and the ongoing PHE since March of 2020, the NRC has taken measures to balance the programmatic requirements, and the need to keep the NRC and licensee staff safe while also applying the NRC's Principles of Good Regulation (independence, openness, efficiency, clarity, and reliability) in performing its safety and security mission to protect public health. For FOF inspections, the NRC implemented innovative strategies to carry out performance-based oversight while minimizing the risk of spreading the virus. Since the PHE began in March 2020, the staff has taken a risk-informed approach to conducting FOF inspections, applying modified inspection procedures (IPs) commensurate with site-specific COVID-19 conditions.

In CY 2019 and in the first 2 months of CY 2020 (before the PHE began in March 2020), 20 sites were inspected using the normal FOF IP (IP 71130.03<sup>5</sup>). After FOF inspections were temporarily suspended from March through July of CY 2020, due to the onset of the PHE, the staff developed and applied a new IP (IP 92707<sup>6</sup>) to conduct limited scope tactical response drills (LSTRDs) which allowed key elements of the site's physical protection strategy to be tested in a manner that mitigated the risk of COVID-19 transmission. The staff conducted 16 inspections in CY 2020 using LSTRDs.

In CY 2021, to prepare for improving COVID conditions at operating reactor sites, the staff developed an addendum (Addendum 5<sup>7</sup>) to the normal FOF IP that emphasized safety protocols related to COVID-19 mitigation, including limiting the inspection to one FOF exercise and allowing the use of the minimum number of personnel from both the licensee and NRC staff during the FOF exercise. This new addendum provided the staff two options for conducting FOF inspections during CY 2021: (1) continuation of LSTRDs when site-specific COVID-19 hardship conditions prevented the use of the modified FOF IP or (2) application of the modified FOF exercise procedure. The staff conducted 6 LSTRD inspections and 12 modified FOF exercises during CY 2021.

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<sup>3</sup> COMSECY-19-0006, "Revised Security Inspection Program Framework (Option 3) in Response to SRM-SECY-17-0100," dated May 19, 2019 (ADAMS Accession No. ML19058A094).

<sup>4</sup> SECY-17-0100, "Security Baseline Inspection Results and Recommendations for Program Efficiencies," dated October 4, 2017 (ADAMS Accession No. ML17223A279).

<sup>5</sup> IP 71130.03, "Contingency Response, Force-on-Force Testing" (ADAMS Accession No. ML21012A329) (not publicly available).

<sup>6</sup> 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 Exercises Is Limited" (ADAMS Accession No. ML20182A668) (not publicly available).

<sup>7</sup> Addendum 5 to IP 71130.03, "Interim Guidance related to the implementation of the inspection procedure 71130.03, Contingency Response – Force-on-Force Testing, during the COVID-19 PHE."

In CY 2022, as COVID-19 conditions continued to improve, the staff was able to resume normal FOF inspections consisting of two evaluated exercises allowing the staff a third inspection option based on site-specific COVID-19 conditions. As of July 1, 2022, eight inspections have been completed conducting the normal FOF IPs, and two were LSTRD inspections.

In sum, from CY 2019 through the present, all 61 sites that were scheduled for an NRC-conducted FOF inspection were inspected using FOF exercises or LSTRDs. All FOF exercises were evaluated as effective with the exception of two ineffective, one marginal, and two indeterminate outcomes. The ineffective outcomes were assessed as findings of very low security significance and the marginal and indeterminate outcomes did not result in findings in accordance with Inspection Manual Chapter 0609, Appendix E, Part II, "Force-on-Force Significance Determination Process." Because the modified procedures implemented during the PHE resulted in a reduction in the total number of exercises evaluated by the staff, the number of outcomes in each category is lower when compared to the FOF inspection results from CYs 2016 - 2018. Accordingly, the staff is unable to assess changing licensee performance over time (i.e., improved or degraded) in this update. Similarly, the extent to which modified procedures are implemented during the remainder of 2022 and subsequent years as the pandemic continues, the staff's ability to assess changing licensee performance in future updates could be affected.

A summary of all FOF inspections since CY 2019 is shown in the following table. Despite the temporary suspension of FOF inspections during the first few months of the PHE, the staff is on track to ensure all operating reactor sites receive an NRC-conducted FOF inspection within the current inspection cycle covering CYs 2020 - 2022.

	Limited scope drills using IP 92707	Modified FOF inspections using Addendum 5 to IP 71130.03	Normal FOF inspections using IP 71130.03	Total number of FOF inspections completed
CY 2019	Not applicable	Not applicable	19 inspections	19 inspections
CY 2020	16 inspections	Not applicable	1 inspection	17 inspections
CY 2021	6 inspections (Note: Improved IP 92707)	12 inspections	0	18 inspections
CY 2022	2 inspections	0	5 inspections	7 inspections to date

In general, the modifications made to the FOF inspection program in response to the PHE were driven by the need to maintain effective oversight while taking reasonable efforts to ensure the health and safety of both the licensee staff and NRC inspectors in the face of dynamic COVID-19 conditions. However, because the modified FOF IP using Addendum 5 involves a reduction from two NRC-evaluated exercises to one, similar to the staff's proposal described in COMSECY-19-0006, the staff found it prudent to capture and communicate insights from this effort as the Commission evaluates COMSECY-19-0006.

The staff learned multiple lessons to enhance future program effectiveness. However, some elements of the innovative framework developed in response to COVID-19 need to be further evaluated for how they may be applied in the long term, to ensure inspector independence and confidence in the ability to assess the overall effectiveness of licensee physical security programs are not challenged. Accordingly, the results of the lessons-learned review are

categorized as: (1) best practices for improved program effectiveness; and (2) potential enhancements needing further evaluation.

#### BACKGROUND:

The Commission directed the staff to provide annual information papers on the status of several staff actions related to the FOF inspection program in SRM-SECY-14-0088. The frequency of providing these information papers was changed to a triennial basis in SRM-SECY-16-0009.

Since the current triennial update has been implemented, the staff has updated the Commission on a regular basis on the changes to the FOF inspection program in SECY-16-0073<sup>8</sup>, SECY-17-0100, and COMSECY-19-0006. The staff also notified the Commission of its readiness to implement the inspection framework described in COMSECY-19-0006 through a Commissioners' Assistants (CA) Note<sup>9</sup> in December 2019.

In advance of the triennial information paper due to the Commission on April 9, 2021, the staff requested an extension to March 2023. The extension request was based on the staff's submission of two CA notes,<sup>10</sup> in CYs 2020 and 2021, respectively, that notified the Commission of the staff's plans to restart FOF inspections during the PHE. The content of these CA notes, combined with annual reports to Congress on the security baseline inspection program (NUREG-1885), collectively described the status of the FOF program and the staff's actions related to ongoing improvements and modifications. The extension request was approved on April 2, 2021. The staff is providing this information paper in advance of the extension to March 2023 because the additional lessons-learned component of this status update may be beneficial to the Commission as it continues to evaluate COMSECY-19-0006.

#### DISCUSSION:

##### **FOF Inspection Program Status Prior to the PHE**

Section 170D of The Atomic Energy Act of 1954, as amended, provides the requirements for the NRC's conduct of the triennial FOF inspection program. Of specific relevance to this discussion, Section 170D requires that FOF exercises shall, to the maximum extent practicable, simulate security threats in accordance with any DBT applicable to a facility and, in conducting a security evaluation, the Commission shall mitigate any potential conflict of interest that could influence the results of an FOF exercise, as the Commission determines to be necessary and appropriate. The NRC inspectors implement the FOF inspection program through IP 71130.03. During the inspection activity, the NRC inspection team develops two FOF exercises designed to test the licensee's protective strategy against a mock adversary force (MAF) that closely simulates the physical capabilities, mindset, and tactical capabilities of the DBT. Inspectors maintain independence and consistency in the inspection effort through the staff's selection of target set objectives and adversary pathways, the staff's oversight of the MAF selection and

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<sup>8</sup> SECY-16-0073, "Options and Recommendations for the Force-on-Force Program in Response to SRM-SECY-14-0088," dated June 1, 2016 (ADAMS Accession No. ML16279A345).

<sup>9</sup> CA note, "Notification of Staff's Readiness to Implement Changes to the Baseline Inspection Program as Identified in COMSECY-19-0006, "Revised Security Inspection Program Framework in Response to SRM-17-0100"" (ADAMS Accession No. ML19343A902) (not publicly available).

<sup>10</sup> CA notes, "FOF Path Forward During the PHE" (ADAMS Accession No. ML20183A272) (not publicly available) and "Notification of Staff's Plan to Implement the Power Reactor Force-on-Force Inspection Program in CY 2021, with Accommodations for the COVID-19 Public Health Emergency" (ADAMS Accession No. ML21019A450) (not publicly available).

performance, and the use of NRC-provided Multiple Integrated Laser Engagement System (MILES) equipment that simulates the broad range of weapons available within the scope of the DBT. Completion of this inspection activity not only fulfills a Reactor Oversight Process triennial inspection cycle requirement, but also provides an assessment of sufficient depth, realism, and independence that verifies with reasonable assurance that licensee protective strategies are adequately developed, and corrective actions are promptly implemented when deficiencies are identified.

The triennial inspection cycle covering CYs 2017–2019 ended with all applicable operating reactor licensees receiving an FOF inspection under the two-exercise structure of IP 71130.03. In parallel with the FOF inspection activities, staff provided COMSECY-19-0006 to the Commission which, if approved, would transform the program into one NRC-evaluated exercise accompanied by a separate enhanced inspection of a licensee-conducted exercise. Staff completed preparations to implement the revised FOF framework of COMSECY-19-0006 and notified the Commission of their readiness in December 2019 through a CA note. With the close of the triennial inspection cycle at the end of CY 2019, the staff proceeded with planning FOF inspections for the new triennial cycle beginning in CY 2020 under the two-exercise structure while maintaining readiness to implement the revised framework should a Commission decision on COMSECY-19-0006 be reached during the new inspection cycle.

### **FOF Inspection Program Status After Declaration of the PHE**

The staff opened the new triennial inspection cycle in CY 2020 by completing one IP 71130.03 inspection using the normal two-exercise structure. Following the declaration of the COVID-19 PHE in March 2020, FOF inspections were suspended while the staff developed a temporary FOF inspection framework that reflected the need to maintain effective regulatory oversight while ensuring the health and safety of both the licensee staff and NRC inspectors. In August 2020, modified FOF inspections resumed following the staff's issuance of IP 92707. Additional modifications to the program were completed by the staff in February 2021, with the issuance of Addendum 5 to IP 71130.03 which, compared to the LSTRDs in IP 92707, allowed for increased exercise scope, reduced artificialities, increased responder participation, and improved assessment independence by using an industry MAF and NRC-provided MILES equipment while minimizing COVID-19 risk. In June 2021, the staff issued TSG-NSIR-2021-01<sup>11</sup> to guide the staff's decision-making on the appropriate inspection procedure to use based on various COVID-19-related conditions.

IP 92707 was developed to maximize the safety of the NRC and licensee staff at sites with adverse COVID-19 conditions while maintaining the capability to verify narrowly scoped elements of a licensee's protective strategy. IP 92707 is conducted in a single week in order to reduce the time and number of NRC support staff and licensee staff needed to complete the inspection activity. The number of off-site personnel needed for the inspection is further reduced by using the licensee's MAF and MILES equipment instead of the industry MAF and NRC-provided MILES equipment normally used during IP 71130.03. For IP 92707, the staff observe a series of LSTRDs that are designed to test key elements of the licensee's protective strategy and individual responder tactics. While exercises conducted under IP 71130.03 permit the staff to observe the entire response force implementing the site's protective strategy, IP 92707 differs by reducing the scope of participation, increasing the use of artificialities, such as planned

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<sup>11</sup> TSG-NSIR-2021-01, "Additional Guidance for Force-on-Force Inspections During the Public Health Emergency" (ADAMS Accession No. ML21180A204).

pauses after each segment to relocate responders and adversaries, and increasing the NRC's reliance on licensee resources to accomplish the inspection objectives.

In February 2021, the staff issued Addendum 5 to IP 71130.03, to accommodate a larger inspection scope with the intent of restoring the staff's ability to independently assess the licensee's protective strategy in a more complete manner. Consistent with IP 71130.03, inspections using Addendum 5 are conducted over a 2-week period and use the industry MAF and NRC-provided MILES equipment during the evaluation. During the Addendum 5 inspection, the staff develop a single complete scenario from initiation of adversary actions to completion of target set objectives and limit licensee responder participation to only those positions that would potentially engage the adversary along the planned pathway. To further reduce the total number of licensee staff involved in the exercise, the staff seek opportunities in the scenario where the exercise can be paused to reposition responders to internal positions of the licensee's protective strategy without introducing an unreasonable advantage to either the response force or the MAF. Addendum 5 to IP 71130.03 differs from IP 92707 by increasing exercise scope with reduced artificialities, increasing responder participation, and restoring elements of assessment independence by using an industry MAF and NRC-provided MILES equipment. In totality, these differences provide a higher degree of the NRC staff independence, exercise realism, and assessment confidence when compared to the LSTRD format of IP 92707.

### **Lessons-Learned Review**

The staff solicited feedback from both headquarters and regional physical security inspectors to identify lessons-learned and recommendations to improve the FOF inspection program. One clear benefit of the staff's experience in developing and applying the three FOF inspection options is that the staff now has the tool set as well as the experience to apply these flexible approaches to conducting FOF inspections in response to any future PHE-related challenges.

While the staff found value in many of the modifications implemented during the PHE, the staff did not view some of the modifications as viable alternatives for future incorporation in the FOF inspection program because of challenges associated with a reduced exercise scope, increased prevalence of exercise artificialities, and increased dependence on licensee resources.

When compared to the unrestricted format of IP 71130.03, both Addendum 5 to IP 71130.03 and IP 92707 challenged the staff's ability to assess the full capabilities of the licensee's protective strategy. Due to the reduced responder participation, the staff's assessment was limited to only the portion of the licensee's protective strategy involved in the drill or exercise. Additionally, omitting non-participating response positions from the drills and exercises provided a possible unrealistic advantage to the licensee's response force by providing a likely indication of the adversary's attack direction and potential target set objectives. Additional artificialities, such as pauses to reposition responders and limitations on adversary pathway selection due to COVID-19 safety protocols, further challenged the overall degree of exercise realism. In contrast, in the unrestricted exercise format of IP 71130.03, all positions required to implement the licensee's protective strategy are fully staffed and mock adversaries are free to select pathways that are most advantageous to successfully completing their objectives. These conditions more accurately represent the dynamic conditions of a combat engagement and contribute to a higher degree of staff confidence in assessing the full capabilities of the licensee's protective strategy. The staff believes maintaining these inspection conditions are vital to the long-term effectiveness of the program and should be restored when PHE conditions make it reasonably safe to do so.

Specific to IP 92707, while using licensee MAFs and MILES equipment was suitable for the more narrowly scoped objectives of IP 92707, training and qualification standards for licensee MAFs vary by site and MILES equipment often varies in terms of available armament, engineered safety features, and maintenance. While permitting the use of licensee MAFs and MILES equipment allowed the staff to resume oversight activities during the PHE, permanent adoption without an appropriate level of the NRC oversight could result in inconsistencies in adversary tactical proficiency and exercise realism in cases where available MILES equipment is limited. Relying on these resources to fulfill the NRC's oversight responsibilities without adoption of a common set of standards could degrade the overall degree of independence and assessment confidence provided by the FOF program.

With regard to Addendum 5 to IP 71130.03, while historical data demonstrates the likelihood of an ineffective exercise outcome is minimal, staff noted that Addendum 5 does not provide the ability to conduct an additional exercise within the same exercise week in the event of an ineffective exercise outcome. Specifically, with an ineffective exercise as the sole assessment input, inspectors may not have sufficient information to accurately determine extent of condition or whether similar vulnerabilities exist in areas not specifically tested during the exercise. Conducting an additional exercise within the same inspection week could provide an opportunity to gather and assess that information. Both Addendum 5 to IP 71130.03 and the single exercise inspection procedure and associated significance determination process presented to the Commission in COMSECY-19-0006 provide follow-up options for ineffective exercise outcomes based on the severity of vulnerabilities identified during the inspection process. These include re-visit actions that could require an additional FOF exercise, depending on the results of the existing risk-informed and graded-approach process for determining the most appropriate re-visit action. While re-visit exercises have typically been scheduled as separate inspection activities at a later date, the staff is in the early stages of exploring the feasibility of conducting a re-visit exercise during the same inspection week to address this insight. The staff will engage with both internal and external stakeholders to determine if this approach may be feasible and, if it is feasible, the staff will seek Commission approval before implementation.

All other insights developed during the lessons-learned review are described in the following sections which have been divided into two general categories: (1) best practices for improved program effectiveness; and (2) potential enhancements for further consideration.

### **Best Practices for Improved Program Effectiveness**

The unique conditions of the PHE required various safety protocols, such as social distancing, to reduce the potential for viral transmission. In keeping with these protocols, the NRC inspectors permitted licensees to exercise flexibilities during their pre-exercise preparations. Under the unmodified IP 71130.03 inspection framework, various all-hands briefs spanning multiple hours are held on the day of the exercise to pass information related to plant conditions, radiological safety, and exercise safety. During the PHE, many licensees delivered versions of these briefs as computer-based training (CBT) modules during the days preceding the exercise and provided updates to these conditions on the day of the exercise in an abbreviated all-hands format. The NRC inspectors maintained an appropriate level of oversight by reviewing CBT content and verifying participant completion logs prior to the start of the exercise. These modifications were effective in reducing both the licensee and NRC staff hours on site on the day of the exercise with no reduction in safety margin. The staff intends to sustain this efficiency during future FOF inspections, regardless of the inspection framework being applied.

The single exercise construct of Addendum 5 to IP 71130.03 allowed more time for staff to observe industry MAF mission planning and preparation, and increased time to interface with the licensee as they developed exercise controls. The standard IP 71130.03 limits inspectors to a small number of hours before exercise execution which can at times leave the inspection staff and licensee staff with limited time to identify and correct issues related to planned MAF tactics and exercise controls. The staff found value in the enhanced observation of MAF preparations which provided greater confidence that the MAF and their exercise controllers were well-rehearsed and knowledgeable of the mission plan. The staff also found value in the enhanced opportunity to ensure the licensee was adequately prepared to implement and control the planned exercise scenario in a manner that supports the NRC's effective assessment of the exercise. The staff intends to leverage this enhancement in the two-exercise structure of IP 71130.03 by utilizing the additional time gained from the previous best practice related to CBT. The staff is also prepared to sustain this improvement if the Commission approves the single NRC-conducted exercise framework described in COMSECY-19-0006.

### **Potential Enhancements for Further Consideration**

FOF exercises conducted under IP 71130.03 and Addendum 5 to IP 71130.03 terminate upon successful neutralization of all members of the adversary force. In many cases, exercises terminate well prior to the adversary force reaching the internal layers of a licensee's protective strategy. Because the LSTRD format of IP 92707 focuses on testing successive segments of an entire adversary pathway independently, starting externally and ending at the target set objective, staff gained valuable insights into how licensees have developed their physical protection programs with defense-in-depth in mind should an adversary successfully penetrate the external layers of the licensee's strategy. Many staff expressed support for LSTRDs not as a replacement for NRC-evaluated exercises but as another possible tool to enhance oversight.

One area where LSTRDs could be of benefit is as an additional assessment tool for the staff to resolve indeterminate exercise outcomes in the proposed FOF program structure described in COMSECY-19-0006. Since the proposed program structure consists of a single NRC-evaluated exercise as the NRC's only independent evaluation input, indeterminate outcomes are problematic because they would potentially prevent the staff from determining whether the licensee's protective strategy is effective as designed or ineffective and in need of corrective actions to address a vulnerability. To address this, the staff incorporated guidance into the proposed revision of IP 71130.03, presented in COMSECY-19-0006, such as reactivating neutralized adversaries, conducting additional walkdowns, and conducting interviews with security force members to assist the staff in resolving indeterminate outcomes. In cases where the staff determines that reactivating neutralized adversaries is necessary to complete the assessment, the LSTRD format could be used to reduce the scope to the elements in question to gain the additional information needed to determine the outcome of the exercise. The staff is currently in the early stage of evaluating the feasibility of this enhancement and anticipates external stakeholder engagement would be necessary prior to moving forward. If the staff determines that additional guidance to the proposed revision of IP 71130.03 in COMSECY-19-0006 is necessary to leverage this enhancement, the staff will engage the Commission prior to implementation.

Another area where LSTRDs could be applied is through revision of specific guidance in IP 71130.05.<sup>12</sup> The staff uses IP 71130.05 to assess licensees' development of their protective

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<sup>12</sup> IP 71130.05, "Protective Strategy Evaluation and Performance Evaluation Program" (ADAMS Accession No. ML16175A030).



strategies and to verify that the licensees implement a performance evaluation program (including licensee-conducted drills and exercises) in a manner that ensures the protective strategy's continued effectiveness against the DBT. These licensee-conducted drills and exercises are distinct from the FOF exercises in IP 71130.03, which serve as the NRC's independent test of the licensee's response capabilities. Since IP 71130.05 is conducted triennially, it is not uncommon for licensees to have modified their protective strategy through adjustment of responders and other various enhancements such as additional physical barriers, delay features, and early warning systems. LSTRDs could serve as a valuable tool in verifying the effectiveness of these modifications or as a tool to resolve issues of concern identified during the inspection. The staff is currently in the early process of evaluating the feasibility of this enhancement and anticipates external stakeholder engagement would be necessary prior to moving forward. If the staff deems it beneficial to pursue this enhancement, staff will seek Commission approval prior to implementation.

#### CONCLUSION:

The FOF inspections conducted from CY 2019 to the present demonstrated that operating reactor licensees were able to implement their physical security programs to provide for reasonable assurance of adequate protection of public health and safety and the common defense and security at their sites. Furthermore, the lessons drawn from the application of the single exercise format for conducting FOF inspections do not change the staff's recommended approach in COMSECY-19-0006. The staff continues to assess opportunities to risk-inform and modernize the FOF program while advancing efforts targeted at increasing realism in the FOF inspection program as the Nation continues its recovery from the PHE.

This status update fulfills the information requirements described in ticket SRM-S14-0088-4. The staff will provide the next status update on FOF inspection program activities in 3 years, consistent with the direction provided in SRM-SECY-16-0009. The staff requests the SECY to establish the new due date as 3 years from the date of this information paper.

#### COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed the paper for resource implications and has no objection.



Signed by Dorman, Dan  
on 07/08/22

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SUBJECT: CALENDAR YEAR 2022 TRIENNIAL FORCE-ON-FORCE INSPECTION  
PROGRAM STATUS UPDATE AND LESSONS-LEARNED Dated July 8, 2022

**SRM-S14-0088**

**ADAMS Accession Number: ML22145A217**

**\*via email**

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