INSPECTION PROCEDURE 71130 ATTACHMENT 15

SECURITY OPERATIONS

Effective Date: July 1, 2026

APPLICABILITY: IMC 2201 A

CORNERSTONE: Security

INSPECTION BASES: See IMC 0308 Attachment 6

SAMPLE REQUIREMENTS:

| Sample Requirements | | Minimum Baseline Completion Sample Requirements | | Budgeted Range | |
|---|---|---|---|---|---|
| Sample Type | Section | Frequency | Sample Size | Samples | Hours |
| Security Operations | 03.01 | Annual | 2 | 2 – 3 | 16 - 24 |
| Security Equipment Condition | 03.02 | Annual | 2 | 2 – 3 | |

71130.15-01 INSPECTION OBJECTIVE

01.01 To verify the licensee's implementation of security programs is in accordance with regulatory requirements, U.S. Nuclear Regulatory Commission (NRC)-approved security plans, and licensee implementing procedures.

01.02 To verify the licensee identifies and corrects deficiencies in the implementation of the physical security program in accordance with the NRC-approved security plans, regulatory requirements, and licensee implementing procedures.

71130.15-02 GENERAL GUIDANCE

Through verification of the inspection requirements within this inspection procedure (IP), inspector(s) shall ensure that the licensee's physical protection program associated with this sample is designed and implemented to meet the general performance objective of Title 10 of the *Code of Federal Regulations* 73.55(b) and the licensee's physical security plan.

In preparing to complete this procedure, the inspector(s) should familiarize themselves with relevant documentation, which may include, but is not limited to, the licensee's security plans, site-specific and corporate implementing procedures, security post orders, and security program reviews and audits. Specifically, the inspector(s) should apply additional attention to recent security plan changes that could be relevant to the inspection activity.

The guidance within this procedure is provided as a tool that: (1) recommends to the inspector(s) certain methods and techniques for determining licensee security program compliance and effectiveness related to an inspection requirement or; (2) clarifies certain aspects of a regulatory requirement associated with a particular inspection requirement. The inspector(s) should complete the additional actions contained in this guidance as closely as possible to maximize thoroughness. The inspector(s) are responsible for selecting the appropriate number of examples within each inspection requirement to determine that the licensee is meeting the performance objectives of the inspection sample. Should questions arise regarding procedural requirements or guidance, the inspector(s) should consult with regional management and the Division of Oversight and Compliance Programs, Office of the Chief Nuclear Reactor Inspector for clarification.

## 71130.15-03 INSPECTION REQUIREMENTS

### 03.01 Security Operations

**a. Verify the performance of the licensee security force is in accordance with regulatory requirements, the physical security plan, and implementing procedures.**

Specific Guidance:

The inspector(s) should observe security personnel performance of required daily or normal operational tasks and activities. Each observed activity would constitute one sample in accordance with this inspection requirement. The inspector(s) should verify that licensee security personnel perform the observed task in accordance with the security plan and implementing procedures. Additional observations may be needed if the inspector(s) require more information to disposition an issue of concern. The level of effort spent on those observations should be limited to what is needed for disposition, and observations performed solely for that purpose should not be counted as additional inspection samples.

To select this sample, the inspector(s) can perform a variety of observations of security personnel performance. Insights gained from the review of problem identification and resolution program entries can inform the selection of observations. For example, the inspector(s) can observe, but are not limited to:

- Personnel searches at the main access point
- Vehicle searches at the vehicle barrier in the owner-controlled area or protected area barrier
- Material searches in the licensee warehouse facilities
- Alarm station operations
- Security officer patrols of the protected and vital area
- Security personnel performing testing of security equipment (e.g., card readers, biometric devices, intrusion detection equipment, etc.)

The inspector(s) should coordinate with the licensee to verify scheduled activities, as necessary, to ensure observations of security risk significant activities. Prior to the observation, the inspector(s) should review the licensee implementing procedures to familiarize themselves with the licensee expectations for performance of the task or activity.

If the inspector(s) elect to observe alarm station operations, the inspector(s) should observe the alarm station operations for activities assigned to the alarm station operator that could interfere with the alarm station operator's ability to perform alarm station duties and responsibilities. Alarm station operators must be able to: (1) detect and assess alarms; (2) initiate and coordinate response; (3) summon offsite assistance; and (4) provide command and control without interference. During alarm station observations, the inspector(s) should position themselves in a position to not interfere with the operator's duties. Additionally, the inspector(s) should exercise caution as to not distract the operator from their primary duties.

When observing personnel, material, or vehicle searches, the inspector(s) should position themselves in a location where the activity can be observed without interfering with the process or contaminating the search. The inspector(s) should discuss observation protocol and positioning with the search officer prior to the start of the evolution. For all types of searches, all items must be identified through physical or visual searches prior to granting access to the protected area. Technology such as X-Ray machines may be used as long as the security officer can identify the items. For vehicle searches, the inspector(s) should verify that at a minimum the vehicle cab, engine compartment, undercarriage, and cargo area are subjected to search.

03.02 Security Equipment Condition

**a. Verify through walkdowns, that security equipment is maintained, deficiencies are identified and corrected, and the equipment remains capable of performing its intended function in accordance with regulatory requirements, the physical security plan, and implementing procedures.**

Specific Guidance:

The inspector(s) should perform a walkdown of selected security equipment, a single security system, or defensive positions.

For example, but not limited to, the inspector(s) can walkdown:

- Protected area fence (is there any material degradation that exceeds acceptable limits)
- Security back-up power supply (are there any alarms, is the system in bypass)
- Bullet resistant enclosures (BRE) and response positions (do the gun ports open/close)
- Security delay barriers (do they perform their intended function)
- Security compensatory measures (implemented in accordance with security plan)

The inspector(s) should verify that the material condition of security equipment is maintained such that the equipment would be capable of performing its intended function in accordance with the licensee's physical security plan and implementing procedures.

To select this sample, inspector(s) should evaluate the licensee's physical security plan and protective strategy implementing procedures and select systems or positions that are security risk significant. For example, the inspector(s) should prioritize security systems and positions that significantly contribute to the licensee's' ability to detect, assess, interdict, and respond to threats up to and including the design basis threat of radiological sabotage.

If the inspector(s) walkdown BREs, the inspector(s) should be mindful of the on-duty security officer. The inspector(s) should not distract the security officer from their primary duties or post responsibilities. If the security officer is on a compensatory measure, the inspector(s) should position themselves in a position as to not obstruct the performance of the compensatory measure.

Security equipment is vital for the effective implementation of the protective strategy. If a security system is out of service or degraded a compensatory measure might be needed to restore regulatory compliance. If the inspector(s) identify inoperable or degraded security equipment/system(s) they must report the deficiency to a security supervisor so mitigative actions can be implemented.

To inspect compensatory measures, the inspector(s) should obtain a list of current compensatory measures that are being implemented from CAS/SAS or the security shift supervisor. Licensees have the option of implementing compensatory measures within specific timeframes identified in the physical security plan or implementing a risk-informed methodology to determine the appropriate compensatory measure based on several site-specific threat and defense-in-depth considerations. In cases where the licensee implements a risk-informed process, the inspector should verify that the licensee followed their process as described in implementing procedures and implemented the appropriate compensatory measure based on this evaluation. The inspector should then query individuals assigned to perform this compensatory measure to ensure the individuals are performing the actions required by implementing procedures. Additional information regarding this risk-informed process can be found at ML18240A329

For licensees who implement compensatory measures in accordance with the timeframes identified in their physical security plan, the inspector(s) should walkdown the security position that is performing the compensatory measure, review the specific post order for the compensatory measure, interview the security officer to check for understanding and ensure the compensatory measure that is being implemented provides an equivalent level of protection for the degraded or inoperable equipment, system, or component. If the inspector(s) identify any concerns with the compensatory measure, they should remain at the location and request that a security supervisor respond to their location so the concern can be resolved.

71130.15-04 REFERENCES

Site Specific Security Plan

RG 5.44, “Perimeter Intrusion Alarm Systems,”

RG 5.62, “Physical Security Event Notifications, Reports, and Records”

RG 5.66, “Access Authorization Program for Nuclear Power Plants,”

RG 5.69, “Guidance for the Application of the Radiological DBT in the Design, Development and Implementation of a Physical Security Protection Program that Meets 10 CFR 73.55 Requirements,” (SGI)

RG 5.74, “Managing the Safety Security Interface”

RG 5.75, “Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities,”

RG 5.76, “Physical Protection Programs at Nuclear Power Reactors,” (SGI)

RG 5.77, “Insider Mitigation Program,” (OUO-SRI)

RG 5.81, “Target Set Identification and Development for Nuclear Power Reactors,” (OUO-SRI)

NUREG-1959, “Intrusion Detection Systems and Subsystems”

NUREG-1964, “Access Control Systems”

NUREG/CR-6190, Revision 1, “Protection Against Malevolent Use of Vehicles at Nuclear Power Plants—Updated to Reflect Revised DBT,” (SGI)

END

Attachment 1: Revision History for IP 71130.15

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| Commitment Tracking Number | Accession Number<br>Issue Date<br>Change Notice | Description of Change | Description of Training Required and Completion Date | Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information) |
|---|---|---|---|---|
| N/A | ML25253A398<br>06/03/26<br>CN 26-024 | Initial issuance as discussed in ROP rebaseline SECY-26-0014 and SECY-26-0015. | N/A | ML25253A392 |