



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 2, 2026

SECRETARY

MEMORANDUM TO: Michael F. King
Executive Director for Operations

FROM: Carrie M. Safford, Secretary

SUBJECT: STAFF REQUIREMENTS – SECY-26-0015 –
RECOMMENDATIONS FOR REVISING THE SECURITY
BASELINE INSPECTION PROGRAM INCLUDING THE FORCE-
ON-FORCE INSPECTION PROGRAM

The Commission has approved the staff's proposed revisions to the security baseline inspection program, including the Force-on-Force (FOF) inspection program, based on stakeholder feedback and consistent with the goals established by Executive Order 14300, "Ordering the Reform of the Nuclear Regulatory Commission." This includes replacing 8 of the 11 security inspection procedures (IPs) with 2 new IPs as proposed, changing the periodicity of the material control and accounting IPs from triennial to "as-needed," and changing the periodicity of cybersecurity IPs from biennial to triennial.

With respect to the NRC-conducted FOF triennial inspection, the Commission has approved 1) revising how exercise outcomes are characterized – to be about learning and correcting any weaknesses – and 2) allowing licensees to have an increased role in scenario development. However, with respect to exercise frequency, the staff should retain one exercise per inspection consistent with current practice.

The staff should retain the NRC inspection of a licensee-conducted FOF exercise.

With respect to the existing policy for conducting an enhanced NRC inspection of a licensee annual FOF exercise, the staff should explore and apply innovative approaches to perform that inspection in an efficient manner, for example, by relying on a reduced number of inspectors, increased use of technology for observations, and using enhanced sampling approach to observe the actions of the responders, the mock adversary force, and the exercise controllers.

After the current triennial NRC-conducted FOF inspection cycle using the above approved approach, the NRC should transition to observing a single licensee-conducted exercise. By June 2028, prior to the transition, the staff should provide an information paper to the Commission describing the plan for transitioning to observing licensee-conducted exercises. The plan should be informed by operating experience, insights, lessons, and external stakeholder feedback from the application of the above approved approach from both the NRC-conducted exercises and the observation of licensee-conducted exercises.

During the transition period, the staff should engage external stakeholders to identify and mitigate any unintended consequences or burdens of moving away from NRC-provided Multiple

Integrated Laser Engagement System gear and mock adversary forces to ensure a smooth transition.

If significant declines or adverse trends are observed in licensee safety and performance, the agency should adjust its oversight activities promptly.

The staff should identify development pathways for security professionals so their talents can be effectively applied beyond the security oversight program.

The staff should perform an assessment of the NRC's ability to transition cybersecurity inspection support functions in-house by the start of the next triennial inspection cycle in 2029. The assessment should identify gaps in expertise, training, and resources; justify any proposed elimination of contractor support; and recommend actions to ensure sufficient technical competence for effective oversight of licensee cybersecurity programs.

cc: Chairman Nieh
Commissioner Wright
Commissioner Crowell
Commissioner Marzano
Commissioner Weaver
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CFO
OCA
OPA
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PDR