

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Chairman Burns
SUBJECT: COMSECY-15-0025: Proposed Revision to the Notification Process for Force-on-Force Inspections

Approved Disapproved Abstain Not Participating

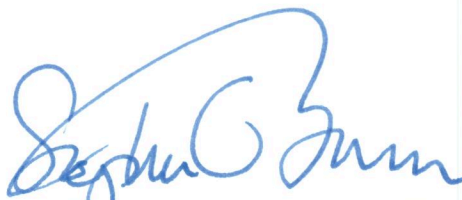
COMMENTS: Below Attached None

I approve the staff's recommendation to revise the approach for notifying nuclear power plant licensees of upcoming NRC-conducted force-on-force (FOF) exercises to align with the Reactor Oversight Process. Under the revised approach, the planned FOF inspection dates would be included in the 15-month inspection plan provided to licensees during Mid-Cycle and End-of-Cycle Assessments. I agree with Commissioners Svinicki and Ostendorff that this is a reasonable outgrowth of lessons learned from the previous FOF inspection cycles. I also agree with Commissioner Baran that this action will enhance planning for both the agency and licensees.

Entered in STARS

Yes

No



Signature

29 September 2015

Date

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: COMMISSIONER SVINICKI
SUBJECT: COMSECY-15-0025: Proposed Revision to the
Notification Process for Force-on-Force Inspections

Approved XX Disapproved _____ Abstain _____ Not Participating _____

COMMENTS: Below XX Attached _____ None _____

I approve the staff's proposed revision to the advanced notification to licensees of force-on-force inspections from the former period of 8 to 12 weeks prior to the inspection to a new period of 9 to 15 months prior to the inspection. This change is a reasonable outgrowth of lessons-learned arising from the three triennial inspection cycles now completed and is a practical recognition of the conflicts in scheduling force-on-force inspection dates around other mandatory NRC and licensee activities.



SIGNATURE

09/ 14 /15

DATE

Entered on "STARS" Yes No _____

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER OSTENDORFF

SUBJECT: COMSECY-15-0025: Proposed Revision to the Notification Process for Force-on-Force Inspections

Approved Disapproved Abstain Not Participating

COMMENTS: Below Attached None

I approve the staff's proposal to change the advanced notification to licensees of Force-on-Force inspections from an 8- to 12- week period, to a 9- to 15- month period, consistent with notifications of other NRC inspections. I agree with Commissioner Svinicki that this change is a reasonable outgrowth of lessons-learned arising from the three triennial inspection cycles now completed.

Entered in STARS

Yes

No



Signature

9/17/15

Date

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: Commissioner Baran

SUBJECT: COMSECY-15-0025: Proposed Revision to the Notification Process for Force-on-Force Inspections

Approved XX Disapproved _____ Abstain _____ Not Participating _____

COMMENTS: Below XX Attached _____ None _____

The NRC staff proposes to revise the approach for notifying licensees of planned force-on-force (FOF) inspection dates. Currently, the NRC's notification to licensees is 8 to 12 weeks ahead of these inspections. The staff recommends changing the advanced notification to 9 to 15 months.

When this issue was first assessed in 2004, the staff was concerned that "a longer notification window might not provide as accurate an assessment of typical security force readiness." However, having completed three triennial FOF inspection cycles, the staff's concerns have been alleviated by the experience gained through implementation of the FOF inspection program, as well as enhancements that have been made to the security inspection program, including NRC observation of licensee-conducted FOF exercises. FOF exercises are not intended to be "surprise" inspections and require significant pre-planning between the NRC staff and licensees. Given the current advance notification of 8 to 12 weeks, I do not view earlier notification as changing the dynamics of the exercises. For reactor sites, the proposed advanced notification timeframes would better align with the Reactor Oversight Process because the 15-month inspection plan for each site would include the FOF inspection dates. This will enhance planning for both the agency and licensees. The frequency of FOF inspections would remain once every three years for each site. Category 1 fuel cycle facilities would be notified along similar timeframes under this revised approach. Therefore, I approve the staff's recommendation.

Entered in STARS

Yes X

No _____



Signature

9/25/15

Date