

Note: This proposed revision to Inspection Procure (IP) 71130.03 replaces in its entirety the current IP 71130.03; therefore, a redline/strikeout version has not been provided.

NRC INSPECTION MANUAL

NSIR/DSO

INSPECTION PROCEDURE 71130.03

CONTINGENCY RESPONSE – FORCE-ON-FORCE TESTING

PROGRAM APPLICABILITY: IMC 2201, Appendix A

71130.03-01 INSPECTION OBJECTIVES

01.01 To gather appropriate information related to the licensee's physical protection program, develop the scenario, and plan the mission for a performance-based force-on-force (FOF) exercise.

01.02 To verify through the execution of a performance-based FOF exercise, that the licensee's physical protection program provides protection against the design basis threat (DBT) of radiological sabotage.

01.03 To verify that the FOF inspection includes problem identification and resolution where a documented post-exercise critique is conducted in which participants identify failures, deficiencies, or other findings in performance, plans, equipment, or strategies and that problems identified during the inspection are entered into the licensee corrective action program (CAP) in accordance with program requirements.

71130.03-02 INSPECTION REQUIREMENTS

General Guidance.

The Office of Nuclear Security and Incident Response (NSIR) is the lead office for this inspection effort. NSIR will determine the inspection schedule in consultation with the regional offices.

The NRC staff uses FOF exercises, which are performance-based inspection activities, to verify a licensee's ability to meet the general performance objective and requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55 and to ensure the NRC complies with the Atomic Energy Act of 1954 as amended, Section 170D "*Security Evaluations.*" Inspector(s) are responsible for ensuring that the objectives in the inspection procedure are completed and evaluated to a level that provides assurance that licensees meet the NRC regulatory requirements and that the sample is complete. When minimum sampling numbers are indicated, inspector(s) shall adhere as closely as possible to the numbers identified in the guidance. When compliance concerns arise, inspector(s) may expand the sample through the conduct of re-visit action to aid in determining the extent of the condition. Should questions

arise regarding procedural requirements or guidance, inspector(s) shall consult with NSIR management.

The inspector(s) shall familiarize themselves with relevant documentation, which may include, but is not limited to, the licensee's NRC-approved physical security plan; safeguards contingency plan; training and qualification plan; and cyber security plan collectively referred to as the security plans. The inspector(s) shall also conduct a review of results from past security inspection reports for the facility, which include FOF inspection reports and applicable security baseline inspection reports.

The inspector(s) shall coordinate with the licensee's staff before the inspection. Key areas of coordination include scheduling the dates and times to conduct site access and badging; dosimetry; entrance meeting; overview of licensee CAP; review of site information that will be provided to the Mock Adversary Force (MAF) Director for scenario development; licensee protective strategy brief; trusted agent brief; day and night site tours of the owner controller area (OCA), protected area (PA), vital areas (VAs), target sets, alarm stations, and response positions; intrusion detection system (IDS) performance testing (optional); scenario development and disclosure; and preliminary debriefs and exit meetings. Scheduled tours with the licensee are considered site familiarization and shall not preclude the inspector(s) from conducting more detailed walk-downs and assessments as needed.

Additionally, the inspection team shall categorically document all lessons learned in the event there is a follow-on executive lessons learned (ELL) meeting. The team lead will be responsible for identifying ELLs during the entire conduct of the inspection, which includes notification, preparation, and documentation; onsite planning week; pre-exercise week; onsite exercise week; and post-exercise week. Categories to be considered include, but are not limited to, coordination of inspection activity; review of the licensee's submittal of requested documents listed in Addendum 6, site access and badging; strategy overview; site tours; tabletop assessments; scenario development; safety; Multiple Integrated Laser Engagement System (MILES) equipment; controllers performance; MAF team performance; licensee response personnel performance; post exercise hot washes; and management critiques. Enforcement issues will not be captured by this process.

Interface with the Office of Nuclear Reactor Regulation.

The NRC Team Lead will be responsible for the following:

1. Ensure that the Nuclear Reactor Regulation (NRR) Project Manager for the facility is informed of the impending FOF inspection and determine the level of NRR's participation.
2. Ensure that concerns identified with the adequacy of the licensee's MILES analysis will be provided to the Electrical Engineering Branch and the instrumentation and Control Branch, Division of Engineering, Office of Nuclear Reactor Regulation for a comprehensive review.

U.S. Special Operations Command (SOCOM) Advisors.

During the period of the inspection, the SOCOM advisors are under the supervision of the NRC Team Lead and are representing the NRC. SOCOM advisors are expected to participate in all aspects of the inspection (unless otherwise directed by the NRC Team Lead) and provide subject matter expertise to the NRC inspection team. Advisors are also expected to comply with team inspection procedures and protocols. Official communications with licensee personnel that are not safety-related but impact inspection performance, policies, or procedures are prohibited unless previously cleared with the NRC Team Lead. The SOCOM advisors are expected to know and comply with both licensee and NRC rules and regulations except where deviations are permitted during limited scope evaluations. If a licensee employee approaches an advisor with an allegation, the advisor shall note the name and contact information of the allegor and report that information to any member of the NRC inspection team so that follow-up action can be initiated.

Prior to the onsite inspection activities, the NRC inspection team will provide the advisors with information about the site (electronically or hard copy) to include but not limited to (1) general site information; (2) pathways utilized during previous inspection cycles; (3) potential target sets; and (4) focus areas to evaluate during the planning week inspection.

When the advisors arrive onsite, the NRC inspection team will meet with the advisors to go over the inspection schedule for the week and the advisor(s) role for each activity.

During the MAFs planning time, the SOCOM advisors' role is limited to that of a technical advisor. Additionally, information gleaned from other inspection activities are only to be disclosed to the MAF by the team lead, as appropriate. The SOCOM advisors will not play an active role in the simulated attack. The advisors will assist the FOF team lead in identifying key terrain, obstacles, cover and concealment, observation and fields of fire, and avenues of approach that are attractive for the DBT to exploit, bypass, or develop countermeasures for an attack. At the direction of the NRC team lead, the advisors may provide direction to the MAF on utilization of available equipment or tactics as long as such information is within the DBT. This shall normally be done through the use of a "time-out." In the event that a MAF member is unable to determine what actions to perform, the SOCOM advisors may also call a "time out," inform the NRC team lead of the issue, and provide appropriate guidance to ensure that the exercise conforms to the NRC's expectation. The advisors will also assist in exercise evaluation as part of the inspection team, and will provide observations regarding MAF performance.

The SOCOM advisors are expected to pay particular attention to the following:

1. Identify appropriate equipment to disable target set components, barriers, or other materials, and will advise on the development of manual, mechanical, thermal, ballistic, and explosive breaching methods and associated calculations.
2. Identify potential adversary routes (to include alternate routes) to the target set locations. This may require performing OCA, PA, VA tours, response position tours, and alarm station/monitoring station tours with NRC inspector(s), as needed, to understand how the licensee is protecting target sets (specifically the more attractive target sets) and to identify potential weaknesses in the licensee's physical protection measures that may be advantageous to the adversary. An advisor is required to participate in every tour unless otherwise agreed upon with the NRC team lead.

3. Perform tabletop drills to evaluate how the licensee is implementing its strategy in accordance with its implementing procedures, and to test potential vulnerabilities that have been identified during the tours (coordinate with NRC Team Lead before execution of this activity).
4. Report any potential area of regulatory noncompliance, safety or security issues, or potential vulnerabilities in the licensee's physical protection systems to the NRC inspection Team Lead.
5. Attend the adversary brief, adversary safety brief, and adversary controller briefing prior to the exercise.

Mock Adversary Force.

The MAF is composed of personnel that have received extensive training in adversary tactics designed to replicate, as close as practicable, the DBT adversary as described in 10 CFR 73.1. These personnel generally include trained and qualified armed security officers (ASOs)/armed responders (ARs) from other sites who have been assigned to the MAF for a period of time. The MAF director is the lead interface with the NRC inspection team and is responsible for receiving and finalizing the NRC-developed scenario to evaluate the licensee's physical protection program during the NRC-evaluated FOF exercise. The MAF director and team members report directly to the NRC inspection team lead during the conduct of the FOF inspection. The NRC Team Lead is responsible for developing scenarios; delivering scenarios to the MAF director for finalization; evaluating the scenario development process to ensure each scenario meets the NRC's intent; eliminate any potential conflicts of interest that could influence exercise results, as necessary and appropriate; evaluate MAF rehearsals and performance during each exercise to ensure that the MAF replicates the DBT adversary; and provide feedback to the MAF Director on lessons learned and areas for improvement. During the exercise, members of the MAF shall demonstrate speed, agility, and endurance. These personnel shall also demonstrate proficiency in weaponry and marksmanship, individual and team offensive tactics, and use of explosives commensurate with a well-trained and motivated attack force. Simulated utilization of specific explosive devices will be conducted under the direction of the SOCOM advisors, since the MAF may not, and will not be, specifically trained in this area by the NRC inspection team. This may occur during the planning or execution of the exercise. In addition, to augment existing participant knowledge, the SOCOM advisors will provide technical advice on the use of weapons and equipment to the MAF as needed. If MAF performance does not meet the NRC standard (see NSIR/STD-2004/15-001, Rev 1, "Composite Adversary Force Performance Standards for Force-on-Force Exercises" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18164A031)), the SOCOM advisors will brief the NRC team lead. Lessons learned or areas for improvement by the NRC inspection team will be documented and briefed to the Chief, Security Performance Evaluation Branch (SPEB), NSIR.

To achieve a level of realism commensurate with a team that has trained for several years on a scale model of the nuclear facility destined for attack, the MAF should be familiar with key avenues of approach into and through the facility's defense-in-depth layers to attractive target sets; licensee security procedures and processes, including surveillance and patrols; IDS and assessment systems; physical barriers; access controls; search protocols; security response positions; and licensee response to nuclear security and safeguards contingency events.

Due to the limited time available for MAF preparation during a regulatory exercise week, the MAF will be given access to information no later than 3 weeks before the regulatory exercise week. All communications, equipment, and materials requested by the MAF for scenario development shall be processed through the NRC team lead and the licensee being evaluated. The NRC team lead (or designee) must receive the requested information in time to review and transmit the information to the MAF before the exercise. This enables the MAF to do the following:

1. Assimilate site information;
2. Perform walk-downs and collect information about the target, routes, response procedures, and countermeasures employed by the licensee;
3. Finalize the mission plan after the NRC has provided targets, approach routes, and the NRC's intent; and
4. Conduct relevant mission training and rehearsals.

The MAF shall be provided with suitable training areas for rehearsals and tabletops. In addition, the MAF shall have reasonable accommodations with visual and acoustic privacy to include a location to train, conduct rehearsals, and store equipment. Personnel who directly observe MAF training or are in close proximity to the MAF during rehearsals must be trusted agents and approved by the MAF Director, the NRC team lead, and licensee security management.

Escalation Process.

If issues arise during the inspection, the NRC Team Lead will follow the latest revision of the Division of Security Operations Office Procedure, "Force-on-Force Escalation Process" (ADAMS Accession No. ML18221A094).

02.01 NRC-Evaluated Force-on-Force Preparation, Mission Planning and Scenario Development

Gather the appropriate information related to the licensee's physical protection program, develop the scenario, and plan the mission for a performance-based FOF exercise.

Specific Guidance.

The NRC inspection team will prepare for the inspection in coordination with the licensee, the SOCOM advisors, the MAF director, and the MILES contact. The NRC inspection team will also evaluate the licensee's documents and mission planning information packet, conduct NRC management briefings, and arrive onsite for planning week where they will complete mission planning and scenario development.

In-Office Notification and Preparation Process.

The FOF Team Lead, FOF Program Manager or inspector, as designated by the team lead, will send a notification email to the licensee 15 weeks before the onsite planning week inspection. Following confirmation from the licensee that the email notification has been received, the following activities shall take place:

- Provide the NRC inspection team with expectations and assignments

- Coordinate travel logistics with all team members
- Coordinate a time to conduct a logistics phone call with the licensee
- Exchange key points of contact between NRC and licensee personnel
- Coordinate site access and badging with the appropriate regional and licensee personnel
- Coordinate the planning week schedule with NRC and licensee personnel
- PGP Key exchange between NRC inspection team members and site POC.
- Coordinate with the Senior Resident Inspector or Resident Inspector at the site to ensure awareness of the inspection activities, and to ensure the functionality of the SLES equipment onsite.

In-Office Review of Licensee Submittal.

Upon receipt of the licensee's submittal of the requested documents listed in Addendum 6, the team will evaluate the following areas, at a minimum:

- OCA, PA, and VA review of targets, pathways, barriers, IDS, cameras, patrols, and response.
- Alarm station locations, communications, assessment capabilities, and response timelines.

The NRC Team will review and prepare any clarifying questions to be asked during their onsite inspection activities.

The inspection team shall (1) review all target sets to determine which target sets appear vulnerable to attack based on site layout; and (2) identify potential pathways and preliminary methods to destroy target set equipment using the adversary briefing worksheet in addendum 2. Four weeks prior to the onsite planning week, the designated inspector should set up a team meeting to review target sets with a Security Risk Analyst.

The week prior to the planning week onsite, a final team meeting should be conducted to ensure all travel arrangements have been established, contact information is available for inspectors, site access training and site specific training is complete, onsite assignments are understood, the planning week schedule has been communicated to all team members, and all licensee communications are completed. The team lead and/or inspector should ensure that all appropriate documentation is prepared for travel to include: (1) trip logistics; (2) entrance meeting; (3) exit meeting; (4) FOF inspection sign-in roster; (5) adversary briefing worksheet; and (6) FOF planning week schedule.

In-Office Management Briefings.

Prior to the planning week, the inspection team will brief management on the results of the preparation for the upcoming FOF. This briefing will cover potential ELLs and disputed items identified by the inspection team during preparation, discuss focus areas for the upcoming inspection, and provide management with an overview of potential attractive targets and routes identified during preparation for inspection. The Team Lead will present the information to management and receive input from inspectors during the brief on their assigned areas. The briefing, at a minimum, should present:

- Inspection dates and date of last inspection and results
- Facility name and type of reactor
- Names of assigned inspectors
- Overview of the facility, which includes an overview of the perimeter of the licensee OCA, PA, grouping of target sets, normal ingress and egress routes, and location of previous FOF exercise routes
- Overview of potential focus areas for the upcoming inspection
- OCA, PA, and VA review of targets, pathways, barriers, IDS, cameras, patrols, and response
- Alarm station locations, assessment capabilities, timelines for alarm communications
- Potential regulatory issues of concern
- Potential disputed items

Onsite Planning Week.

The first week onsite is the planning week. Planning week is conducted by an NRC headquarters (HQ) Team Lead and two headquarters physical security inspectors. Planning week activities shall include (1) an entrance meeting; (2) a CAP briefing; (3) a protective strategy briefing; (4) tours of the OCA, PA, VA, target sets, alarm stations, and response locations; and (5) exercise scenario development.

1. Entrance Meeting: An entrance meeting shall be scheduled the first day the team arrives onsite with the senior licensee representative who has responsibility for the areas to be inspected. The inspection team should also ensure that the site resident inspector(s) are informed and invited to attend the entrance meeting. The meeting should introduce the team to the licensee and the licensee's Trusted Agents, state the inspection objectives, state the process which will be used to meet the objectives, discuss expectations related to safety and security during the conduct of the exercise, discuss any changes or revision to the planned schedule, and exchange contact information.
2. Corrective Action Program Overview: The inspector(s) shall participate in a licensee-led briefing on the site CAP to ensure an understanding of how the licensee enters programmatic deficiencies that adversely affect or decrease the protective strategy and physical protection program into the plant's CAP. This information is important to understand thresholds and processes used to enter issues into the CAP and assists in the review of issues that may be presented in the licensee management critique.
3. Protective Strategy Brief: The inspector(s) shall review the licensee's security plans, safeguards contingency plan, training and qualification plan, site protective strategy implementing procedures, and blast analysis data to understand the site's protective strategy in support of scenario development and mission planning. The inspector(s) shall also request that the licensee provide a protective strategy overview/briefing that details its protective strategy and all supporting physical protection measures that the licensee employs in support of its strategy from the outermost layer of defense to target sets within the inner most areas of the site. The review and briefing will provide detailed

insights pertaining to the design of the licensee's protective strategy and assist the inspection team in scenario development.

Preparatory reviews conducted by the inspector(s) and protective strategy overview/briefing provided by the licensee should provide the inspector(s) with an understanding of (1) the basis for the licensee's protective strategy; (2) how the licensee has considered elements of the DBT within the design of its strategy; and (3) how the licensee implements its protective strategy. The expectation of the protective strategy brief is to provide a detailed overview of the entire defense-in-depth program and allow for inspectors to gather additional information.

4. Tours of the OCA, PA, VA, Target Sets, Alarm Stations, and Response Positions:

Through the conduct of walk downs in the OCA, PA, VA, target sets, alarm stations, and response positions, inspector(s) shall evaluate how the licensee implements procedures and processes to detect, assess, and interdict unauthorized vehicles, personnel, and equipment attempting to gain access to target set equipment, defensive positions, or other protected locations. The inspector(s) shall conduct the walk-downs taking into consideration adversary characteristics, which could be used to bypass or exploit the licensee's physical protection program. Inspector(s) should conduct walk-downs during daylight and as needed during the hours of darkness/reduced visibility to evaluate (1) site OCA, PA, and VA; (2) location of target set equipment; (3) IDS and assessment aids; (4) physical barriers and access controls; (5) patrols, surveillance, and response positions; (6) command and control and communication capabilities; (7) operating procedures (e.g., access control point hours, closed barriers, etc.); and (8) responses to safeguards contingency events. Insight gained from these tours shall be validated during the tabletop drills to help inform FOF scenario development. Inspector(s) shall coordinate with the licensee to ensure only Trusted Agents participate in the tour(s). At a minimum, the inspector(s) shall evaluate potential protective strategy vulnerabilities and areas that would be advantageous for an adversary to exploit to gain access to target set equipment. Areas determined to be exploitable or attractive shall be presented to the team lead for evaluation to determine if the area(s) should be incorporated into the NRC-scenario. The areas to evaluate include, at a minimum:

- OCA and PA boundaries
- Limits of observation and surveillance
- Buildings and structures connected to OCA, PA and VA boundaries
- Roads, waterways, and key avenues of approach into the OCA, PA and VA
- Targets within the OCA, PA and VA and associated weaknesses
- Targets within the PA that are observable from the OCA
- Equipment/weapons within the OCA and PA that could be advantageous to a potential adversary
- Key terrain features, cover and concealment in the OCA and PA for response personnel and potential adversaries
- Fields of fire/observation for response personnel and potential adversaries
- Access control points (type, location, monitoring, and hours of operation)
- Identification of PA response/patrol personnel, equipment, armament, and capabilities

- Identification of OCA response/patrol personnel, equipment, armament, and capabilities
- Location of all PA exterior response positions (type, location, name, timeline)
- Location of all PA interior response positions (type, location, name, timeline)
- Location of redeployment response positions, and associated timelines
- Search requirements and processes
- Barrier types and locations (e.g., fences, vehicle barriers, etc.)
- IDS and cameras (type, capability, location, monitoring, and frequency)
- Lighting (type, capability, location)
- Security power supplies (source and locations)
- Surveillance and patrols and associated frequency and routes
- Primary and secondary communications for response personnel
- Response procedures to safeguards contingency events in the OCA, PA, and VA
- Video image recording equipment clarity and quality
- Video assessment capabilities during normal and reduced visibility conditions
- Timeline for receipt of an alarm, assessment, and communication to appropriate response personnel
- Evaluate other actions or equipment configuration, which could impact alarm assessment and or communication capabilities (e.g., phone calls, radio calls, etc.)
- Effectiveness of command and control

During evaluations of avenues of approach, the inspection team may request that a limited scope evaluation (LSE) be performed using the SOCOM advisors as the adversary to evaluate how the licensee detects and assesses the areas under evaluation. Before a LSE, the NRC inspectors must coordinate with the SOCOM advisors and the licensee to identify and discuss methods that could be used to challenge the area(s) identified. This includes discussions related to when the testing will be conducted (e.g., day, night, or both), required equipment, bypass methods, and safety requirements. If a LSE is conducted, at least one inspector is required to observe the areas to be evaluated, while a second inspector reviews timelines for receipt of an alarm, assessment, and communication to appropriate response personnel. If available, a third inspector should observe the testing from a licensee response position that also has assessment capabilities. Inspector(s) shall ensure that (1) personnel safety is considered; and (2) the risk of damaging licensee barrier and sensor equipment has been identified and discussed with the appropriate site security representative.

In accordance with 29 CFR 1904.3(a), NRC employees and their advisors are not considered to be "covered employees" under the licensee's occupational safety and health administration program. However, in the performance of an LSE, SOCOM advisors should make every effort to adhere to licensee safety procedures, and deviations should only be made if needed, and no other means are available, to complete an important evaluation.

5. Tabletop Drills: Following the site tours, the inspection team will identify specific scenarios for tabletop drills and discuss these scenarios and specific DBT attributes with the SOCOM advisor(s). The tabletop drills should simulate external assaults, attacks by stealth (covert), and deception tactics (including diversions) to gain detailed insights of the licensee's protective strategy, and how the security plans are implemented. The

insights gained by conducting tabletops shall include; (1) site OCA, PA, and VA; (2) IDS and assessment aids; (3) physical barriers and access controls; (4) attractive pathways/key avenues of approach; (5) patrols, surveillance, and response positions; (6) command and control and communication capabilities; (7) operating procedures; and (8) responses to safeguards contingency events. Insights gained from the tabletop drills shall be used to inform FOF scenario development.

The NRC Inspection team lead shall brief participants that tabletop drills are not based on a win/lose paradigm and that the NRC may override the results of the simulated engagement so that the effectiveness of inner defenses can be more effectively evaluated. The inspection team should direct tabletop activities with a SOCOM advisor playing the role of the adversary. Additionally, it is preferred that only Trusted Agents participate in tabletops. The SOCOM advisor should indicate an entry point or entry points into the PA and the tactics employed. A licensee response team lead (RTL) should play the role of the responders. The licensee should indicate how responding armed security force members would be deployed to interdicting positions, as determined by the licensee's contingency response. The RTL shall be advised that the tabletop drills are to use only the minimum number of ARs and ASOs, as committed to in the site physical security plans. Tabletop drills shall be conducted with the appropriate members of licensee staff participating, such as the central alarm station operator (CAS), secondary alarm station operator (SAS), security shift supervisor (SSS), and a licensed reactor operator.

6. Exercise Scenario Development: The Atomic Energy Act of 1954, as amended, Section 170D, "*Security Evaluations*", requires that the FOF exercise shall, to the maximum extent practicable, simulate security threats in accordance with any DBT applicable to a facility. The inspection process does not emulate the amount of time available for an insider to provide information to an adversary; therefore, the method of providing insider information is secondary to providing accurate information in an expedited manner. To achieve a level of realism commensurate with adversary characteristics, as described in 10 CFR 73.1, the MAF's interaction with site personnel and their controllers should emulate data that could be gathered through several years of dedicated information and intelligence gathering. Site personnel that are requested to obtain information to support the exercise scenario should be added as a Trusted Agent (see Addendum 1).

The NRC inspection team will begin preparations to develop two challenging scenarios upon completion of protective strategy briefings, site tours, and tabletop assessments. The second scenario will be used if re-visit actions are required in order to complete this inspection sample. By preparing a second scenario during planning week, a second planning week will not be necessary during a re-inspection. In preparation for scenario development, the NRC team lead will ensure licensee personnel are provided to the MAF Director to provide information for exercise scenario planning, in any method agreed to by the NRC FOF inspection team lead including, but not limited to, the use of multiple personnel to provide information, the use of a knowledgeable individual, or the use of a point of contact who can expeditiously gather information for the MAF. All information learned by the inspection team during the conduct of the inspection shall be used by the NRC FOF inspection team to develop scenarios to evaluate the licensee's implementation of their NRC-approved security plans.

During scenario development, the NRC inspection team will meet to discuss: (1) attractive target sets and method of destruction; (2) potential routes and pathways to target sets; (3) security systems, barriers, patrols, and response personnel which must be bypassed or negotiated; and (4) applicable adversary composition, characteristics, and tactics, techniques, tools, and procedures to employ.

The results of the scenario planning will be documented using Addendum 2, "*FOF Adversary Briefing Worksheet and Guidance*" which will describe the details of both of the scenarios from the adversary staging, into and through the OCA/PA/VA, to the target set. The inspection team should have the licensee make copies of Addendum 2 and associated target sets on a copier approved for Safeguards Information (SGI) and in accordance with site procedures for producing and handling SGI. One copy should go to the MAF Director, one copy should go to the licensee, and the original copy of Addendum 2 should be locked in an NRC SGI-approved bag and stored in the licensee's SGI safe until exercise week. Following completion of the inspection, the licensee will mail the NRC SGI bag back to Headquarters.

The NRC inspection team lead or inspection team member will brief the MAF Director and appropriate licensee trusted agents on Addendum 2 for both scenarios. The Team Lead shall make it clear which scenario will be used for the exercise and which will be used in the event re-visit actions are necessary. This provides information to the MAF director regarding; (1) attractive target sets and method of destruction; (2) potential routes and pathways to target sets; (3) security systems, barriers, patrols, and response personnel which must be bypassed or negotiated; and (4) applicable adversary composition, characteristics, and tactics, techniques, tools, and procedures to employ. This information allows the MAF Director to become familiar with the site, provide input, and prepare for OCA tours.

The NRC inspection team will ensure that the MAF Director is provided a detailed tour of the OCA. NRC inspectors, SOCOM advisors, and licensee trusted agents, as necessary, will attend the tour. During the tour, the MAF Director will perform a complete tour of the OCA and the exterior of the PA perimeter. The primary focus of the tour is to capture all the items identified by the NRC inspection team. This tour also allows the NRC to finalize and discuss scenario details as provided in Addendum 2, with NRC inspectors, SOCOM advisors, and the MAF Director. The tours should also allow the MAF Director to (1) take photos and or video of the OCA and PA perimeter safeguard systems and security organization; (2) evaluate potential infiltration routes up to the PA perimeter; (3) identify potential key terrain features, which can be used during exercises; (4) identify surveillance systems and patrols along identified routes of travel; (5) identify obstacles along selected routes of travel that must be exploited to support movements; (6) identify areas along the selected route of travel where exercise artificialities may occur; and (7) identify potential unsafe areas. Interior travel routes will be developed through information provided from the NRC inspectors, SOCOM advisors, and licensee trusted agents.

Following the OCA tour with the MAF, the MAF director will provide both of the written scenarios to the NRC inspection team for review. The licensee trusted agents will then have the opportunity to review the scenario and ask clarifying questions or express concerns. The licensee will only develop a matrix for the scenario being exercised. In

the event that re-visit actions are necessary, the second scenario matrix will be developed at that time. The scenarios will continue to be subject to minor adjustments and clarifications until the NRC inspection team has completed their review of the exercise matrix on Tuesday of exercise week. Minor adjustments that do not change the scenario or controller events will be allowed only with the approval of the NRC team lead, or the team lead's designee. Revisions which require significant changes to the licensee controller event matrix will be communicated to the licensee, as soon as practicable. For significant revisions, the NRC team lead shall determine whether proposed revisions to the sequence of the events would add significant value to the evaluation of the effectiveness of the site protective strategy. Any revision must meet the following three criteria: (1) be within the scope of the DBT, (2) not have the potential to introduce an unfavorable safety condition, and (3) have effective controls or simulations.

Pre-Exercise Week.

The two weeks between the onsite planning and exercise week allow for additional review of scenarios, development of exercise events matrices, and allows for clarifications. The inspection team will also brief NRC management on the scenarios. During the week prior to exercise week, the licensee will provide an exercise schedule and a copy of the exercise event matrix for NRC review. The exercise event matrix will be discussed with the licensee in detail on Tuesday of exercise week and changes will be made accordingly prior to the exercise on Wednesday.

02.02 NRC-Evaluated Force-on-Force Exercise

Verify, through the execution of a performance-based FOF exercise, that the licensee's physical protection program provides protection against the DBT of radiological sabotage.

Specific Guidance.

The NRC inspection team will evaluate the licensee's overall ability to demonstrate effectively that its protective strategy and the execution of that strategy meets the general performance objective of 10 CFR 73.55(b). The exercise will be used to evaluate the protective strategy, the implementation of the strategy, the timeliness of the response capability, the weapons employed, the overall effectiveness of the security training provided, and the ability of the security organization to defend the site and protect target set equipment against the DBT adversary force. The inspection team shall also observe FOF exercise controllers to ensure they are trained and qualified with the requisite knowledge and experience to control and evaluate an exercise.

Exercise Week.

The second week onsite is the exercise week. Exercise week will be conducted by an NRC HQs Team Lead, two HQs physical security inspectors, and one Regional physical security inspector. Exercise week activities shall include; (1) exercise scenario matrix review; (2) safety walk-downs; (3) controller briefings (adversary and player); (4) safety briefings (adversary, player, controller, on-duty); (5) on-duty shift briefings; (6) MILES issuance and return process;

(7) one performance based exercise; (8) exercise hot washes; (9) licensee post-exercise critique process; and (10) assessment of lessons learned. Monday and Friday of exercise week are considered travel days.

1. Exercise Scenario Matrix Review: On Tuesday, the inspection team will conduct a review of the exercise scenario matrix to ensure each one meets the objectives provided in the Adversary Briefing Worksheet.
2. MAF Oversight: On Tuesday, the inspection team will provide oversight of the MAF to ensure MAF preparedness and identify and mitigate any potential conflict of interest issues. This will include the review of adversary mission plans and associated documents, adversary equipment (to include props for the exercise), and observation of adversary preparation and rehearsal drills without equipment, with limited equipment, and with all equipment. Additionally, the NRC inspection team will attend the adversary brief, adversary safety brief, and adversary controller brief.
3. Safety Walk-down: On Wednesday, the inspection team should observe the performance of the licensee safety walk-down where the licensee physically walks down the site to ensure both industrial and radiological safety are addressed.
4. Controller Briefing: On Wednesday, the inspection team shall observe the controller briefings with all adversary controllers and all player controllers to ensure that they understand the events of the exercise, exercise flow and anticipated timelines, and to verify that the controllers understand all expected interactions and potential engagements. The NRC inspection team shall also evaluate controller performance during the exercise. It should be verified that the licensee has established an appropriate amount of controllers for the exercise to ensure that there is control of both exercise participants and on-duty shift personnel. This is important in ensuring that live firearms are not introduced into the exercise. Exercise participants and on-duty personnel should remain under the direct control of a trained and qualified controller for the duration of the exercise. A controller may be assigned multiple exercise participants or on-duty shift personnel; however, if there is a possibility that the group being controlled could be separated for any reason, additional controllers must be assigned. As a minimum, each controller should have the knowledge and experience to do the following:
 - Provide timely and accurate information to the players to ensure consistent and orderly continuation of the drill or exercise in line with the scenario.
 - Evaluate the application of the no-play area (to include radiation boundaries) and control measures.
 - Evaluate tactical decisions made by the mock adversary force to include alternate avenues of approach, entry points, targets of opportunity, and control measures and tools required to facilitate entry.
 - Evaluate the application of the use of cover and concealment to include natural and fabricated defensive positions by all exercise players.
 - Evaluate the tactical use of exercise weapons including their effective range and capabilities.
 - Evaluate the application of target identification, acquisition, and engagement by players.

- Evaluate the tactical use of hand-carried explosive devices on equipment and personnel and their effects upon detonation.
- Evaluate the effectiveness of body armor employed by players and its ballistic protection during the exercise.

All controllers need to be aware of the entire exercise scenario, including the actions expected of the participant they are monitoring. The controller should evaluate actions that deviate from the expected scenario to ensure that the intent of the exercise scenario is understood. Additionally, controllers benefit from a more in-depth knowledge and experience of the following:

- the use and understanding of the dispersal and effects of chemical agents and smoke grenades,
- the protective mask (gas mask) used and its limitations,
- the overall procedure for conducting FOF exercises, including the use of MILES equipment,
- applicable site-specific delay barriers and movement timelines,
- the site's policy on use of deadly force policy, and
- exercise and site safety procedures.

See the latest revision of Regulatory Guide 5.75, *“Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities”* for more information.

5. Safety Briefing: On Wednesday, the inspection team shall observe the safety briefings that must be conducted prior to the start of an exercise. All scenarios must have proper control measures in accordance with site safety plans and as required by regulations. Additionally, all controllers, players, and observers must be briefed and aware of all potential hazards, along with associated control measures, to prevent an accident, unsafe condition, or loss of the site's security posture from occurring. These briefings should go over specific safety issues such as MILES engagement safety, slip hazards, and generic radiation protection requirements. All personnel participating in the exercise should receive the same safety information.
6. On-duty shift briefing: On Wednesday, the inspection team shall observe the briefing with all on-duty security force members that is conducted to ensure that they understand their role in relation to the conduct of the FOF exercise and specific responsibilities related to safety measures. All communications in this brief should be generic in nature. Specific details of exercise play and scenario shall not be communicated.
7. MILES issuance and return process: On Wednesday, the inspection team shall observe issuance and return of MILES equipment to ensure it is conducted safely and any weapons issues are addressed accordingly. If the licensee uses a sighting system or optic on its weapons that differs from NRC-provided MILES equipment, the licensee is responsible for making acceptable arrangements with the NRC MILES contractor to use the licensee's optics prior to the exercise. The licensee is responsible for providing the MILES contractors adequate support personnel and facilities so that they can perform their MILES support function for the FOF inspection to include; (1) adequate power; (2) licensee personnel to help monitor safety during equipment issue and return; (3)

weapons cleaning after an exercise; and (4) a roster of exercise players that includes their names, post numbers and call signs. An NRC inspector must retrieve three copies of the MILES report immediately following the termination of an exercise. One copy of the report will be provided to the licensee, one copy to the MAF director, and one copy will be maintained by the NRC inspection team to inform the outcome of the exercise and hot wash discussions.

8. FOF Exercise: On Wednesday, in order to successfully demonstrate an effective protective strategy, the licensee must demonstrate that its security systems provide adequate defense-in-depth through the integration of systems, technologies, programs, equipment, supporting processes, and implementing procedures as needed to ensure that the physical protection program can protect against the DBT of radiological sabotage.

The NRC inspection team will conduct a minimum of one exercise. In the case of a canceled exercise, the NRC Inspection team lead in coordination with NSIR management and the licensee should make a decision on whether the exercise can be conducted within the inspection week.

Inspector(s) shall evaluate the effectiveness of the licensee's physical security program, protective strategy, and contingency event response by all individuals with responsibilities for implementing the safeguards contingency plan. The inspector(s) shall ensure the licensee has established methods to conduct an exercise safely and in accordance with site safety plans. In general, the exercise program should include provisions for weapons/ammunition safety, exercise participant safety, site personnel safety, and consider radiological safety. The licensee's implementing procedures should document safety measures.

The inspector(s) shall evaluate whether the inspection meets the following requirements:

- Uses no more than the total number of ARs and ASOs documented in the licensee's security plans equipped with the minimum plan requirements for response equipment. Other personnel committed to in the licensee's security plans (e.g., CAS, SAS, Final Access Control officer (FAC)) should participate as appropriate. Armament depends on the licensee's commitment in the security plans.
- Minimizes the number and effects of artificialities.
- Implements the use of systems or methodologies that simulate the realities of armed engagement through visual and audible means and that reflect the capabilities of armed personnel to neutralize a target through the use of firearms.
- Ensures the scenario used provides a credible, realistic challenge to the protective strategy and the capabilities of the security response organization.

An exercise shall be terminated at any time that the safety of any person or plant equipment is in question. All personnel involved in the exercise have this responsibility. The licensee, with concurrence from the NRC team lead, will normally terminate an exercise when the MAF have either; (1) reached or simulated sabotaging all elements of a target set; or (2) have been neutralized or otherwise rendered incapable of completing

its mission. The NRC inspection team has the authority to terminate an exercise, impose a restart or administrative hold, and override a controller's call at any time.

In those cases where an exercise provides potentially indeterminate results (e.g., it is not an effective or ineffective exercise outcome) the NRC inspection team shall implement operational control measures to allow the inspection team to gather appropriate information to make a final determination related to adequacy of target set protection. The following are examples of actions the inspection team could perform: (1) continuing the exercise by resurrecting adversaries; (2) conduct additional walk-downs during timeouts or following the closure of the exercise window; (3) perform tabletops to understand location of responders along the intended path; and (4) conduct post-exercise interviews with players and licensee controllers to gain additional insights. The inspection team shall consider all of the information gleaned during the entire inspection effort when making its final determination related to the overall exercise outcome. For example, the team shall consider the information and data received during the FOF inspection planning weeks, the information provided by the regional inspection team member, scenario development assumptions, and the extent of the exercise evaluated. If issues are identified that led to the potential indeterminate outcome that can be addressed through the Baseline Security Significance Determination Process (BSSDP), then an evaluation of the exercise outcome should be made, and the issue addressed separately through the BSSDP accordingly.

Additionally, where an exercise outcome of effective or ineffective cannot be made, the NRC will expand the sample and conduct a re-visit action of an NRC-conducted exercise as stated in the latest revision of IMC 0609, "Security Significance Determination Process for Power Reactors," Appendix E, Part II "Force on Force Significance Determination Process."

Definitions

Indeterminate Exercise – Exercises where the results were the results were significantly skewed by an anomaly or anomalies, resulting in the inability to determine the outcome of the exercise (e.g., site responders neutralize the adversaries using procedures or practices unanticipated by the design of the site protective strategy or training of security personnel to implement the site protective strategy or significant exercise control failures to include controller performance failures). The inability to reliably determine the outcome of the exercise can also create an indeterminate exercise.

Effective Exercise – An exercise where the licensee demonstrated effective implementation of its protective strategy in accordance with plans approved by the NRC and related implementation procedures, regulatory requirements, or other Commission requirements, such as orders or confirmatory action letters affecting protective strategy for the conduct of the FOF exercise.

Ineffective Exercise – An exercise where the licensee did not demonstrate effective implementation of its protective strategy in accordance with plans approved by the NRC and related implementation procedures, regulatory requirements, or other Commission requirements, such as orders or confirmatory action letters affecting protective strategy

for the conduct of the FOF exercise. This exercise outcome results from demonstrated performance less than a marginal exercise.

9. Exercise Hot Washes: At the termination of the exercise, inspector(s) shall observe a sample of the licensee's hot washes for both controllers and players. This process should involve evaluation of player performance through self-assessment and controller observations. NRC inspector(s) should ask any necessary clarifying questions. Observation of hot washes allows the inspector to ensure the licensee is identifying problems and capturing them for corrective actions.
10. Licensee Post-Exercise Critique: On Thursday, the inspection team shall observe the licensee's post-exercise critique. See section 02.03 of this inspection procedure.
11. NRC Debrief: The NRC inspection team may choose to debrief the licensee at the end of each week in order to communicate inspection results and informal observations to the licensee. Communicating inspection observations is an integral and important part of every inspection and may be done daily during the course of an inspection as well.
12. Exit Meeting: The NRC team lead will schedule an official exit meeting with the licensee following the conclusion of the exercise week. This exit meeting can be conducted telephonically but should be scheduled within a week or two following exercise week if
13. not completed onsite. Inspectors must meet with licensee management as part of every inspection so that licensee onsite management is aware of the preliminary findings of the inspection including any noncompliance with Regulatory requirements or other security concerns prior to the inspector leaving the site. Potential significant findings shall be promptly communicated to the licensee so that appropriate corrective actions or compensatory measures can be initiated.

02.03 Problem Identification and Resolution

Verify that the FOF inspection includes problem identification and resolution where a documented post-exercise critique is conducted in which participants identify failures, deficiencies or other findings in performance, plans, equipment, or strategies and that problems identified during the inspection are entered into the licensee CAP in accordance with program requirements.

Specific Guidance.

After the conduct of an NRC-evaluated FOF exercise, the team will evaluate the licensee's ability to identify, capture, and enter issues into its CAP. These issues must include all deficiencies and failures that adversely affect or decrease the effectiveness of the protective strategy and physical protection program during the planning or conduct of evaluated exercises. Following the exercise, the licensee will provide a roll-up of observations and items entered into its CAP during a formal critique provided by licensee security management to other licensee and corporate managers, as appropriate for the site. This formal exercise critique is in addition to the hot washes immediately held after each exercise completion. The licensee's post exercise critique should address issues identified by the licensee that have been entered into the site's CAP resultant from the inspection.

The NRC inspection team will observe the licensee's management critique. The NRC inspection team shall capture observations, to include those of the MAF team, for all exercises and utilize these observations and guidance to assist in the evaluation during the course of the formal critique. The NRC Inspection Team Lead will ensure that the MAF Director and any applicable MAF team members are available as needed to assist with the critique. In addition, the team will ensure that SOCOM Advisors are also available to assist, as needed.

The NRC inspection team will assess whether the licensee handles deficiencies identified during the planning and conduct of exercises consistent with the site's CAP procedures, self-assessment, or training program. For example, the licensee should enter into its CAP the failure of any of the following key program elements:

- Responding with sufficient numbers of security personnel. The licensee has the required number of response personnel to implement effectively the protective strategy and protect the target sets against the DBT.
- Responding within appropriate timelines. Response personnel have adequate time to reach their response positions in advance of adversary timelines.
- Responding to protected positions. Response personnel use appropriate protection and cover.
- Responding with appropriate armament. Response personnel are supplied with, or have readily available, the weapons and equipment necessary to execute their responsibilities and are appropriately trained and qualified in the use of the weapons and equipment.
- Providing target set protection. Response plan and response personnel prevent the DBT from completing sabotage of all components of any target set.

The NRC inspection team should request from the licensee any CAP reports created during the conduct of this inspection.

71130.03-03 RESOURCE ESTIMATE

The resource estimate for this section is approximately 275 hours of direct inspection effort once every 3 years. This IP will be conducted as a team inspection. The team will generally consist of one NRC HQs Team Lead and two NRC HQs inspectors during planning week with advisor support. During exercise week, the team will be supplemented with the addition of one regional inspector.

71130.03-04 REFERENCES

None.

71130.03-05 PROCEDURE COMPLETION

This procedure is considered complete when all of the inspection objectives listed in the procedure have been completed. This procedure contains one sample.

END

Addenda:

Addendum 1: U.S. Nuclear Regulatory Commission Office of Nuclear Security and Incident Response Memorandum of Understanding and Agreement Regarding Trusted Agent Responsibilities.

Addendum 2: U.S. Nuclear Regulatory Commission FOF Exercise Adversary Briefing Worksheet.

Addendum 3: Conduct, Agenda, and Rules of Engagement for Contingency Response Force-on-Force. Deleted from this revision.

Addendum 4: Force-on-Force Escalation Process. Deleted from this revision. Escalation process reference located in General Guidance section.

Addendum 5: Guidance Related to Contingency Response – Force-on-Force Testing. Deleted from this revision.

Addendum 6: Document Request List

Addendum 7: Mission Planning Information Packet

Attachment 1: Revision History for IP 71130.03.

ADDENDUM 1
U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF NUCLEAR SECURITY AND
INCIDENT RESPONSE MEMORANDUM OF UNDERSTANDING AND AGREEMENT
REGARDING TRUSTED AGENT RESPONSIBILITIES

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**U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF NUCLEAR SECURITY AND
INCIDENT RESPONSE MEMORANDUM OF UNDERSTANDING AND AGREEMENT
REGARDING TRUSTED AGENT RESPONSIBILITIES**

This memorandum summarizes the purpose, duties, responsibilities, and relationships associated with the use of trusted agents (TA) in connection with the U.S. Nuclear Regulatory Commission's (NRC) Office of Nuclear Security and Incident Response (NSIR) performance testing.

When conducting performance tests, NSIR typically employs one or more TAs - appointed by the tested facility/organization that assists in planning and conducting the performance tests. NSIR places a great deal of reliance on TAs with their intimate knowledge of site configuration, organizations, and procedures to ensure that the necessary detailed planning, coordination, and local resource allocation are achieved on an expedited basis. Since the TA both represents his/her facility/organization and is privy to sensitive performance test information (e.g., scenario details), it is important that the TA has the necessary authority to make appropriate decisions and that he/she and his/her managers understand the confidentiality requirements of the position.

TAs have two main responsibilities. First, they represent their facilities/organization in agreeing to various details of performance test planning and conduct. Such details may include but are not limited to the identification and selection of appropriate insiders or "insider information," selection of realistic scenarios and scenario events, and the development of appropriate control measures and simulations. The TA must have the authority to agree to such test details on behalf of the facility/organization. Sensitive scenario details or other planning details that could compromise scenario information cannot be referred for approval to higher managers or any other individuals who are not TAs. Second, TAs work closely with the NSIR planning team and site personnel to ensure that performance tests are rigorous, realistic, and safe. In this regard, they must willingly provide all information necessary to devise and conduct realistic, meaningful, and safe performance tests. Further, they must take the lead in working with other site personnel to assure that the necessary planning, coordination, and logistical requirements are accomplished; they must do this without divulging or compromising sensitive information that might affect the validity of test results.

Since these responsibilities place the TA in a position that requires a high level of trust to be placed in him/her by both his/her own management and by NSIR, it is important that all parties involved understand the TA's position and agree to bestow or accept the necessary trust. The signatures below formally acknowledge this understanding and agreement.

TRUSTED AGENTS

Name	Signature	Position	Date
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**ADDENDUM 2
FOF ADVERSARY BRIEFING WORKSHEET AND GUIDANCE**

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SAFEGUARDS INFORMATION
(when filled in)

FOF Adversary Briefing Worksheet		
Facility Name:		
Exercise Date:	Adversary Start Time:	Mission Type: <input type="checkbox"/> Core Damage <input type="checkbox"/> Spent Fuel Sabotage
Approach Route(s) and Clarifying Comments:		
Primary Target Set:		
Component Description	Location of Component	Method of Destruction

Issue Date: XX/XX/XXXX

A2-2
SAFEGUARDS INFORMATION
(when filled in)

71130.03

SAFEGUARDS INFORMATION
(when filled in)

Secondary Target Set:			
Component Description	Location of Component	Method of Destruction	
Additional Considerations			
<input type="checkbox"/> Single Entry Point <input type="checkbox"/> Multiple Entry Points <input type="checkbox"/> Deception <input type="checkbox"/> Diversion <input type="checkbox"/> WBIED <input type="checkbox"/> VBIED	<input type="checkbox"/> Suppressed Weapon <input type="checkbox"/> Hand-carried Equip. <input type="checkbox"/> Long Range Weapon <input type="checkbox"/> Explosives <input type="checkbox"/> Incapacitating Agents	Patrol/Response <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA Barrier/VBS <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA Access Control <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA IDS/CCTV <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA	Lighting <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA UPS/Power Supply <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA Communication <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA DFPs/BREs <input type="checkbox"/> OCA <input type="checkbox"/> PA <input type="checkbox"/> VA
Target Material	Charge	Safe Standoff MSD (4 psi)	Neutralization (6 psi)
NRC Team Lead:		Date:	Revision:

SAFEGUARDS INFORMATION
(when filled in)

**ADDENDUM 6
DOCUMENT REQUEST LIST**

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ADDENDUM 6

DOCUMENT REQUEST LIST

Plans, Policies, Implementing Procedures, Post Orders, and Current Compensatory Measures Duties and Responsibilities

1. Physical Security, Training and Qualification, and Safeguards Contingency Plans
2. Security implementing procedures related to:
General
 - Protective strategy and briefing slides
 - Use of Force / Deadly force
 - Security post orders and special instructions
 - Local law enforcement agency memorandum of understanding
 - Onsite emergency response (i.e., fire brigade, confined space rescue, etc.)
 - Current compensatory measures to include duties and responsibilities
 - Camera, camera phone, and video recording device policy
 - Method of maintaining continuous surveillance in the OCA, OCA checkpoint procedure if manned
 - Safety / Security interface

Performance Evaluation Program

- Controller training and qualification lesson plan and briefing slides
 - Sample of blank “hot wash” player and controller evaluation sheet(s)
 - Site safety plans related to the conduct of drills and exercises
 - MILES/SAAB no-play and restricted-play location maps
 - Procedure to ensure that no contraband is introduced into the drill / exercise area (i.e. MILES search procedure)
 - Any site specific product used for controller adjudication of exercise actions/simulations (i.e., tri-fold)
 - Post drill critique exercise sheets, and any lessons learned from the previous 18 months
 - Any planned drill / exercise mock attack scenarios for security force training from the date of the Team Lead teleconference through exercise week
 - All breaching and delay barrier destruction charge calculations that support adversary timelines
3. Table of the Armed Response Team (see attached template)
 - Armed Responders
 - Armed Security Officers (that are dedicated to the armed response team)
 - Security officers that are required to perform other regulatory functions (e.g. search officers, ISFSI response, OCA Patrol(s), etc.)
 - Alarm Station Operators
 - Command and Control (i.e., SSS, RTL)
 - Primary and secondary response positions for the armed response team, call signs or post identifiers, and timelines
 - Complete description of all contingency response equipment and armament

carried or staged

4. Armed response team planned redirect routes to alternate defensive positions and timelines depicted on a map or drawing of the floor plan
5. Roster of squad/shift selected for the triennial exercises

Site Specific Information (Analysis)

1. Blast analysis, for the small and large VBIED and WBIED depicting effects to safety equipment w/ map showing concentric circles or 3D model.
2. Blast analysis for all permanently occupied external security positions (structural leakage, and human fragility with map showing concentric circles depicting the effects or 3D model).
3. Delay barrier analysis that identifies the barriers intended function vs attack methods and task times
4. Loss of off-site power analysis, effects on security-related equipment, UPS, and any low-light technology employed by the security force
5. Security communications, list all equipment in order of precedence, its make and model, frequency bandwidth, range, wired or wireless systems, and any areas onsite where it is unavailable or where procedures dictate its exclusion.
6. Unattended opening analysis (NEI 09-05)
7. Analysis of heavy equipment within the OCA/ PA
8. Current revision of target sets

Photographs

1. Photographs of the following:
 - Security vehicles
 - Off-site response vehicles and equipment
 - Armament
 - Security force uniforms
 - Optics - (thermal, IR, magnified) hand-carried or weapon mounted
 - Personal protective equipment
 - Less-than-lethal devices
 - Site access badges (i.e., unescorted, escorted, visitor, OCA only, vendor)
 - All defensive fighting positions
 - All access point
 - A sample of each different security barrier
 - Gun port view(s) from primary and secondary defensive position(s) and any other planned redirected position(s), if available

Owner Controlled Area (OCA)

1. Maps, and drawings, clearly marked and depicting the following items:
 - OCA boundary
 - Pedestrian and vehicle pathways and roads
 - Waterways to and through the OCA to the PA
 - OCA check point location / Access control points (manned and unmanned)
 - All physical barriers committed to and any retired in place
 - Active, Passive, and Natural Vehicle Barriers
 - Delay barriers
 - Intrusion Detection Equipment (i.e., EWS, SOCA, ROCA)
 - Channeling barriers
 - Electronic surveillance equipment used by the security force by number (i.e., fixed, PTZ, IR/thermal, analytic) identify the area it covers, and what security post provides monitoring and or has controls
 - Bullet Resistant Enclosure location, rating, and fields of fire depicting dead space
 - Protected Area Boundary
 - Mobile patrol routes and all locations where security checks occur
 - Buildings and significant structures (i.e., cell phone tower, switch yard)
 - ISFSI boundary if located in the OCA (if applicable)
 - LLEA response link-up location, and or equipment pick-up location

2. Fire protection floor plans for all buildings and structures in the OCA

Protected Area (PA)

1. Maps and drawings depicting the following items:
 - PA barrier and nuisance fence
 - Access points for personnel and vehicles
 - Intrusion detection zones by number and type of sensor used, and junction boxes / multiplexers
 - Exterior physical barriers, passive and active, delay, channeling,
 - Mobil patrol routes and all locations where security checks occur
 - Electronic surveillance equipment used by the security force by number (i.e., fixed, PTZ, IR/thermal, analytic) identify the area it covers, and what security post provides monitoring and or has controls
 - Locations of security computers, multiplexers, security lighting, UPS, telephone PBX, and repeaters
 - Buildings and significant structures
 - Central Alarm Station and Secondary Alarm Station locations
 - Bullet resistant enclosure location, rating, and fields of fire depicting dead space
 - Exterior defensive fighting position(s), rating, and fields-of-fire depicting dead space
 - ISFSI boundary if located in the PA

2. Floorplans for all buildings/structures in the PA that include:
 - Interior defensive fighting positions, fixed and mobile
 - Delay barriers passive and active, and deployable

- Locations of staged security equipment

The level of detail for these drawings should be consistent with fire protection drawings.

Vital Area (VA) / Radiological Controlled Area (RCA)

1. Maps, drawings, and floorplans depicting all target set component locations, physical protection measures and equipment, response positions, locked and alarmed access points in the VA

Corrective Action Program

1. Provide a briefing that captures / demonstrates the site specific Corrective action program procedure, threshold for entry, and process start to finish from discovery through returned to service
2. Security corrective action reports and resolutions for the previous 18 months

Planned Changes / Updates / Modifications

1. The list should include, but not be limited to, physical security changes, procedural changes, training plan updates, and modification of structures, topography, or vegetation on the site (e.g., new barriers, new defensive positions, laydown areas, woodland areas altered, new security equipment and their training plans).

**ADDENDUM 7
MISSION PLANNING INFORMATION PACKET**

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ADDENDUM 7

MISSION PLANNING INFORMATION PACKET

Please provide the information described in the table to the Nuclear Regulatory Commission inspection Team Lead upon arrival at the site for the inspection mission planning purpose. Items should be provided in a protected electronic format (CD or DVD), preferably in Microsoft Word, Microsoft Excel, or Adobe PDF format. If electronic versions of certain documents are not available, hardcopies will be accepted. Safeguards Information materials must be properly packaged and marked.

1) A single electronic overlay map or drawing, which identifies: (a) owner controlled area (OCA) and protected area (PA) perimeter boundaries; (b) buildings and structures within the OCA and PA; (c) pedestrian and vehicle pathways and roads leading to the OCA and within the OCA and PA; (d) vehicle and pedestrian access control points; and (e) waterways leading to the OCA and PA.
2) A single electronic overlay map, picture, or drawing which depicts the OCA, PA, and vital area (VA) early warning systems, intrusion detection systems, closed circuit television, night vision cameras, thermal cameras, pan-tilt-zoom cameras, active and passive vehicle barrier systems, security computer, security multiplexers, security lighting, security uninterruptable power supply, OCA and PA fences, delay fences, and other security features.
3) Detailed drawings which depict floor plans, doors, windows, roof accesses, vent shafts, and other openings of floor plans for all elevations and locations within the OCA, PA, and VA, to include, but not limited, to basement elevations, tunnels, and underground penetrations. These maps should be official floor plan drawings, which represent the current site configuration. Maps, pictures, drawings, and overlays of fire protection and engineering plans for all buildings in the OCA, PA, and VA are suitable as long as these maps provide the same level of detail.
4) Maps, pictures, and drawings depicting the location of all bullet resistant enclosures, defensive fighting positions (fixed and moveable), PA patrol routes, OCA patrol routes, central alarm station, secondary alarm station, final access control point officer, Security Shift Supervisor, Response Team Leader, access control officers, supplemental officers, armory, and communications storage room.
5) Security communications make, model, type, frequencies, and security force call signs.
6) Detailed description and photos of security force uniforms, weapons, contingency response equipment, low light technology equipment, weapon optics, and personnel protective equipment and devices.
7) Detailed description and photos of security force vehicles and locations.
8) Detailed description and photos of site access badges issued for employees, to include but not limited to security force personnel, emergency personnel, and visitors.

Attachment 1 - Revision History for IP 71130.03

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	01/31/08 CN 08-004	Inspection Procedure (IP) 71130.03 has been revised to incorporate lessons learned from the 24 months of regulatory evaluation, as well as from the evaluation and triennial force-on-force (FOF) program.	N/A	ML080090351
N/A	02/05/09 CN 09-005	Major revisions to incorporate changes to comply with the Commission's directions. U.S. Nuclear Regulatory Commission, Office of Nuclear Security and Incident Response developed and incorporated guidance (addendums) for conducting FOF activities.	N/A	ML083530483
N/A	ML12178A266	IP 71130.03 has been revised to incorporate lessons learned from the previous 40 months of regulatory evaluation of the triennial FOF program and major revisions to incorporate new rule requirements.	N/A	ML093270146
N/A	ML13351A469 12/19/13 CN 13-029	Inspection Procedure revised to reflect Force-on-Force program changes. Those changes included the insertion of the escalation process and revisions to number of exercises required for sample completion.		
N/A	ML14296A215 04/20/15 CN 15-006	This document has been revised to address the program applicability and minor administrative changes.	N/A	ML15041A237

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	ML16348A408 12/22/16 16-035	This document has been revised to remove Addendum 5 and adjust the resource estimate from 435 to 393.	N/A	ML16348A406