

Fact Sheet

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Force-on-Force Security Inspections

Security is a priority for the NRC - it is one of our strategic goals. Force-on-Force (FOF) inspections are an essential part of NRC's oversight of nuclear power plant security programs. One of the NRC's responses to September 11th was to upgrade the security forces at nuclear facilities around the country. To test the adequacy of the security forces, the NRC implemented a more robust FOF inspection program.

Background

The Nuclear Regulatory Commission (NRC) has carried out force-on-force (FOF) inspections regularly at commercial operating nuclear power plants since 1991 as part of its comprehensive security program. However, they are not pass/fail inspections. They are the primary means to evaluate and improve the effectiveness of plant security programs to prevent radiological sabotage as required by NRC regulations (10 CFR Part 73).



FOF inspections assess a nuclear plant's physical protection measures to defend against the "design basis threat (DBT)." The DBT characterizes the adversary against which plant owners must design physical protection systems and response strategies. The NRC periodically assesses the adequacy of the DBT and makes revisions as necessary.

A full FOF inspection, spanning two weeks, includes both table-top drills and simulated combat Exercises between a mock commando-type adversary force and the nuclear plant security force. During the attack, the adversary force attempts to reach and simulate damage to key safety systems and components that protect the reactor's core (containing radioactive fuel) or the spent nuclear fuel pool, potentially causing a radioactive release to the environment. The nuclear power plant's security force, in turn, seeks to stop the adversaries from reaching the plant's equipment and causing such a release. These exercises may include a wide array of federal, state, and local law enforcement and emergency planning officials in addition to plant operators and NRC personnel.

Before Sept. 11, 2001

Before Sept. 11, 2001, NRC conducted FOF inspections about once every eight years at all 65 U.S. nuclear plant sites, in addition to the baseline security inspection program. These inspections were conducted at about eight sites per year. Immediately after the Sept. 11 attacks, nuclear plants went to their highest level of security. FOF inspections were temporarily halted at that time because they would have distracted plant security forces. Instead, NRC security staff focused on strengthening and monitoring security improvements that nuclear power plants made in response to NRC advisories.

Changes Since 9/11

After Sept. 11, 2001, the NRC worked to strengthen its security programs while it reevaluated its DBT and improved its FOF inspections. In one of its key decisions, the Commission increased the frequency of FOF exercises starting in the fall 2004, so that NRC would evaluate each plant site once every three years. All licensees conduct tactical security exercises in the intervening years.

The NRC's redesigned FOF program was refined and enhanced through more than two years of testing at almost two-thirds of the nuclear power plants in the country. [The details of the FOF inspections are Safeguards Information, which is protected by law from public disclosure under the Atomic Energy Act.] An expanded table-top drill program was conducted during 2002 and an expanded FOF exercise program was carried out during 2003.

In February 2004, the NRC began a transitional FOF program that incorporated lessons learned from the previous two years. It also used the characteristics of a supplemented DBT that had expanded adversary force capabilities. In accordance with an NRC Order issued in April 2003, all nuclear power plant operators had to be able to meet the requirements of the supplemental DBT, that altered the type of threats and attacks the plants had to be able to deter, by Oct. 29, 2004. All plants met this requirement.

In November 2004, the NRC began implementing its redesigned, full-scale FOF program, incorporating experience and lessons learned since Sept. 11, 2001. The current program reflects the supplemented DBT and greatly increases the level of realism, while ensuring the safety of plant employees and the public.

NRC gives plant operators some advance notice of FOF inspections for safety and logistical purposes and to provide adequate planning time for coordination of the efforts of two sets of security officers — one for maintaining actual security, another for participating in the exercise. In addition, arrangements must be made for a group of individuals who will control and monitor the exercise. A key goal is to balance personnel safety, while maintaining actual plant security during exercises that are as realistic as possible.

In preparation for FOF exercises, information from table-top drills, inspections, and security plan reviews are used to design a number of commando-style attacks seeking to probe for potential deficiencies in the protective strategy. The aim of the site's defenders is to keep the attackers from destroying or damaging key equipment. Any potentially significant deficiencies in the protective strategy identified during FOF exercises are promptly reviewed and fixed.

The NRC inspection teams that conduct FOF inspections include active duty U.S. Special Operations Forces. These individuals participate in the inspections by assisting the NRC inspectors in developing the scenarios used to test the facilities, provide expert technical advice to the Composite Adversary Force (CAF), assist the NRC inspectors in evaluating site security forces and systems, and provide an independent evaluation of CAF performance.

NRC's FOF security exercises realistically test security forces' capability and security programs at nuclear power plants.

- The NRC requires nuclear power plant operators to defend the plant against attackers seeking to cause damage to the reactor core or spent fuel, resulting in a release of radiation.
- During FOF exercises, a number of commando-style attacks are carried out against a plant's security forces, looking for deficiencies in the plant operator's protective strategy.
- · Any significant problems are promptly identified, reviewed, and fixed.
- Each nuclear power plant site will have at least one FOF exercise every three years.
- The NRC and plant operator ensure the safety of plant employees and the security of the plant during FOF exercises.

CAF

A credible, well-trained, and consistent mock adversary force is vital to the NRC's FOF program. Prior

to Sept. 11th 2001, power plant operators had assembled adversary teams that frequently included security officers from their own sites, other licensees, and state police tactical team members. However, using these diverse sources caused inconsistencies in the capabilities of the adversary team.

To improve the program, the NRC worked with the nuclear industry to develop a CAF that is trained to standards issued by the Commission. NRC initially considered using NRC staff, other federal personnel, and industry personnel for ensuring a credible, well-trained, and consistent adversary



force, but decided to issue adversary force standards and guidelines for the industry to implement. The new adversary force has been used for all FOF exercises conducted after October 2004. The CAF is a significant improvement in ability, consistency, and effectiveness over the previous adversary forces.

The CAF is evaluated during each exercise using rigorous NRC performance standards issued in April 2004. The standards cover:

- knowledge, skills, abilities, performance and training of team members;
- individual and team tactics, tactical communications, and operational planning,
- firearms knowledge and proficiency;
- exercise simulation equipment, physical security systems and specialized equipment; and
- medical qualifications, physical fitness, specific minimum qualifications, and medical disqualification.

The CAF is managed by a company (Wackenhut) that provides security for a number of U.S. nuclear power plants and is, therefore, well-versed in the security operations of power plants. The NRC recognizes that there may be a perception of a conflict of interest where the management company cannot adequately test either the CAF or the plant security force. The NRC requires a clear separation of functions between the CAF and plant security force to ensure an independent, reliable, and credible mock adversary force. In addition, no member of the CAF may participate in an exercise at his or her home site.

It is important to emphasize that the NRC, not CAF, designs, runs, and evaluates the results of the FOF exercises. Because the CAF does not establish the exercise objectives, boundaries, or timelines, and because the CAF performance is subject to continual observation by NRC and its contractors, the agency controls the exercise. Should industry be unable to maintain an adequate and objective mock adversary force that meets the standards mandated by the NRC, the NRC will take the necessary actions to ensure the effectiveness of the FOF program.

A successful FOF program depends on a well trained mock adversary force.

- Variations in adversary teams led to inconsistencies.
- •NRC and industry developed a CAF, trained to NRC standards, for all FOF exercises.
- The CAF is a significant improvement in ability, consistency, and effectiveness over the previous adversary forces.
- The NRC, not the CAF, designs, runs and evaluates the results of the exercises.

NRC's Overall Security Program

FOF inspections are an essential part of NRC's oversight of plant owners' security programs and their compliance with NRC security requirements. The agency continues to evaluate and strengthen its overall security program in response to changes in the threat environment, technological advancements, and lessons learned. As a result, substantial improvements to nuclear plant security have been made to protect against terrorism and

radiological sabotage including:

- A well-trained security force,
- Robust physical barriers,
- Intrusion detection systems,
- Surveillance systems, and
- Plant access controls.

Together, these efforts help make nuclear power plants among the best protected private sector facilities in the nation.



- Dirty Bombs
- Nuclear Security Enhancements Since 9/11
- Safety and Security Improvements at Nuclear Plants

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