

Insider Mitigation Program for U.S. Nuclear Power Plants

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Concept of the Insider Threat Is Not New

- ***“Quis custodiet ipsos custodes?”*** is a Latin phrase attributed to the Roman poet Juvenal (55-127 AD) from his *Satires* (Satire VI, lines 347–8), which is literally translated as **“Who will guard the guards themselves?”**.
- While the concept of the insider threat is not new, an insider mitigation program must be a graded, risk informed approach adaptable to meet the challenges of an ever-changing global threat environment.

Key Legislative Authority

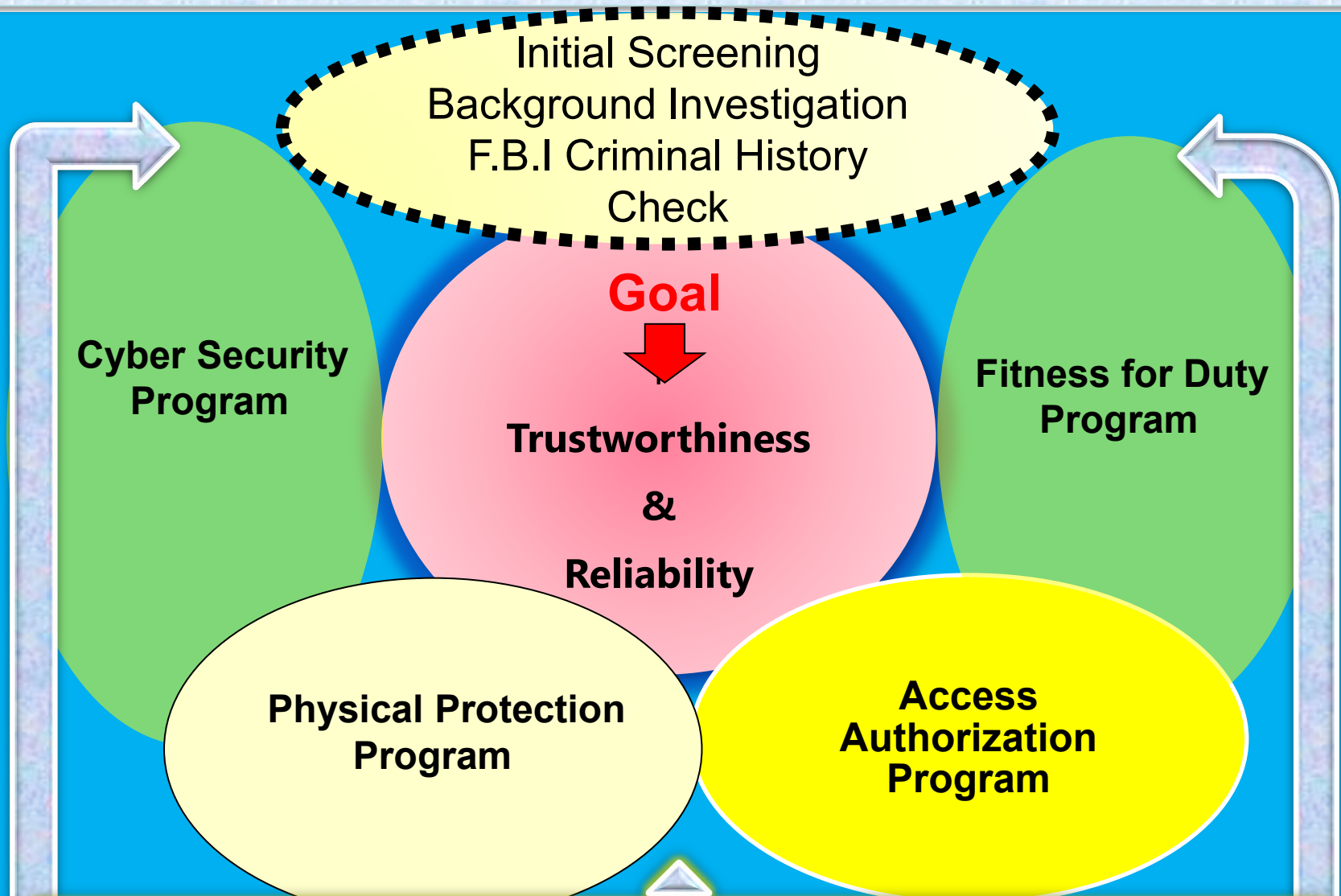
- Atomic Energy Act of 1954, as amended
- Energy Reorganization Act of 1974, as amended
 - ❖ Established the NRC as an independent regulator entity
- ▶ The Public Health And Welfare 42 U.S.C. § 2201 (General Duties of the Commission) - promulgation of regulations
- Nuclear Non-Proliferation Act of 1978
- Energy Policy Act of 1992
- Energy Policy Act of 2005 § 652 & Order EA-07-305

Defense-In-Depth Strategy

- **10 CFR 73.1 – Purpose and Scope**
 - **(a) (1) E (ii) - An Internal threat**

- **10 CFR 73.55(b)(9)(i) - Methodologies employed by licensees to implement an IMP must include elements from:**
 - The access authorization program described in 10 CFR Part 73.56.
 - The fitness-for-duty program described in 10 CFR Part 26.
 - The cyber security program described in 10 CFR Part 73.54.
 - The physical protection program described in 10 CFR Part 73.55.
- **10 CFR 73.56 & 73.57 – Initial Access Authorization**
- **10 CFR 73.56 (f) & 10 CFR 26.33 - Behavior observation**
 - Behavior observation program includes elements from the IMP, AA, and FFD
 - Implementation by licensees is documented in the physical security plans that are a condition of their license.

Integration of Required Insider Mitigation Components 10 CFR 73.55 (b)(9)(i)(ii)(A)(B)(C)(D)



NRC Inspection & Oversight & Enforcement



Requirements for Initial Access Authorization

10 CFR 73.56 & 73.57

| Unescorted | Escorted |
|-----------------------------------|---|
| Consent and Advisement | Procedures for processing, controlling, and escorting visitors |
| Personal History Questionnaire | Visitor control register |
| Verification of True Identity | Confirmation of visitor's identity |
| Employment History Evaluation | Verify any prior denials of access |
| Credit History | Visitor badges |
| Character & Reputation Evaluation | Escort Training |
| Criminal History Review | Communication with security staff |
| Psychological Assessment | Escort should be knowledgeable of any work the individual may perform |
| Drug and Alcohol Screening | Escort should be familiar with work area |



Requirements For Reinstatement of Unescorted Access Authorization 10 CFR 73.56 & 73.57

| Within 365 days | Within 30 days |
|--------------------------------|--------------------------------|
| Consent and Advisement | Consent and Advisement |
| Personal History Questionnaire | Personal History Questionnaire |
| Verification of True Identity | Verification of True Identity |
| Employment History Evaluation | |

Behavior Observation Program (BOP) Component

- Training on warning signs of aberrant or other behavior not conducive to trustworthiness and reliability
 - What to do if you observe aberrant behavior – see something, say something
- Processes in place to address aberrant behavior for the protection of the workers and the facility
 - Hot line with contact information posted in facility
 - Employee assistance program; self-reporting requirement
 - Annual supervisory reviews
 - Random, for cause, and post-event drug and alcohol testing
- Fair and balanced application of a BOP
 - Consent forms
 - Appeal process

Questions/Comments

