



ONR GUIDE			
COUNTER TERRORISM RESPONSE EXERCISES			
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1 INTRODUCTION

1.1 The Nuclear Industries Security Regulations (NISR) 2003 (as amended) (the regulations) contain requirements for responsible persons to make certain arrangements, including the steps to be taken in response to malicious events. ONR inspects compliance with the regulations, and also with the arrangements made under them, to judge their suitability and the adequacy of their implementation. In relation to the response to malicious events this takes the form of evaluating a counter terrorism response exercise (CTX). To support inspectors undertaking compliance inspections, ONR produces a suite of guides to assist them to make regulatory judgements and decisions in relation to the adequacy of compliance. This inspection guide is one of the suite of documents provided by ONR for this purpose.

2 PURPOSE AND SCOPE

2.1 The purpose of this document is to provide guidance on compliance inspections of demonstration CTXs. It is intended to promote a consistent approach to the inspection of the response to malicious events and the evaluation of exercises. This guidance is not intended to be mandatory, but provides a framework for inspectors, on which to base their judgement and discretion during such inspections.

2.2 This guidance does not indicate when or to what extent these compliance inspections should be made. These matters are covered in the integrated intervention strategy and individual inspectors' inspection schedules.

2.3 This guidance considers the relevant aspects of NISR regulation 4 (Section 3) and identifies their purpose (Section 4). It then indicates the key considerations that should be reflected in the responsible person's arrangements (Section 5) and guidance on inspecting the implementation of these arrangements (Section 6).

3 REGULATION 4(1) AND 4(3)(D) AND RELATED REGULATIONS

3.1 Regulation 4(1): There must be an approved security plan in place at all times for each nuclear premises (whether or not the premises form part of other premises to which this paragraph applies).

3.2 Regulation 4(3)(d): In particular...the plan must describe the standards, procedures and arrangements relating to - the steps to be taken by the responsible person or any person acting on his behalf if any event of a kind specified in regulation 10(5)(a), (b), (e) or (h) that requires immediate action occurs, and the regular practice of the activities required in connection with those steps.

3.3 Regulation 2(1) states that in the regulations, unless the context otherwise requires, nuclear premises means:

- (a) a nuclear site, other than one in relation to which all nuclear material or other radioactive material that was used or stored has been removed as part of the decommissioning (within the meaning given in Chapter 1 of the Energy Act 2004) of that site
- (aa) a nuclear construction site on which works are being carried out-
 - (i) by a developer; and
 - (ii) pursuant to the grant or issue of a relevant consent, without which the carrying out of those works would be unlawful
- (b) premises that form part of a nuclear site and are premises on which a person, who is not the holder of the nuclear site licence and is not acting as an officer, employee or contractor of that holder, uses or stores nuclear material or other radioactive material

- (c) other nuclear premises on which Category I/II nuclear material or Category III nuclear material is used or stored, but excluding premises that are used solely for the purpose of the temporary storage of such material during the course of or incidental to its transport in any case where the standards, procedures and arrangements in respect of the security of the transport are contained in an approved transport security statement
- 3.4 Regulation 2(2) states that the term responsible person, in relation to any nuclear premises, means:
- (a) in the case of a nuclear site falling within paragraph (a) of the definition of “nuclear premises”, the holder of the nuclear site licence
 - (aa) in the case of a nuclear construction site falling within sub-paragraph (aa) of the definition of “nuclear premises”, the developer
 - (b) in the case of a premises falling within paragraph (b) of that definition, the person mentioned in that paragraph
 - (c) in the case of premises falling within paragraph (c) of that definition, the person who uses or stores the Category I/II nuclear material or Category III nuclear material on those premises
- 3.5 Throughout this guide the terms responsible person and dutyholder are used interchangeably.
- 3.6 The events specified in regulation 10(5)(a), (b), (e) or (h) are:
- (a) any unauthorised incursion on to the premises or any attempted or suspected such incursion
 - (b) any incident occurring on the premises involving an explosive or incendiary device or suspected such device, or a firearm or replica firearm
 - (e) any theft or attempted theft, or any loss or suspected loss, or any unauthorised movement-
 - (i) of any nuclear material used or stored on the premises or in transit to or from them, or
 - (ii) in the case of premises which are or form part of a nuclear site, of any other radioactive material used or stored on them
 - (h) any threat to do anything which would fall within any of sub-paragraphs (a) to (g)

4 PURPOSE OF NISR REGULATION 4(1) AND 4(3)(D)

- 4.1 Regulation 4(1): The approved security plan is known as the Nuclear Site Security Plan (NSSP). In order to gain approval this must describe where material is held, its vulnerability and the risks it is vulnerable to, together with security arrangements that ensure the nuclear premises as a whole, and material held therein, is properly protected.
- 4.2 Regulation 4(3)(d): Part of the arrangements for the premises as a whole must describe the steps to be taken in response to a range of events. The activities required in connection with those steps are commonly known as the counter terrorism contingency plan (CTCP). As part of the NSSP, this is subject to approval by ONR.
- 4.3 The key clause in relation to CTXs is the regular practice of the activities required in connection with those steps, ie the CTCP and the standards, procedures and arrangements contained therein. In part, this regulation seeks to ensure that those responding to certain events, including the potential nuclear safety implications of an event, are trained and experienced, so that the emergency organisation functions effectively, under potentially hostile and adverse conditions. Although the CTX which ONR evaluates should form part of an exercise programme for practicing the CTCP, it

provides an opportunity for the dutyholder to demonstrate its capability and for ONR to confirm the same.

5 GUIDANCE ON ARRANGEMENTS FOR COUNTER TERRORISM EXERCISES

- 5.1 Effective CT arrangements are an integral part of the overall strategy for ensuring NM, ORM and Vital Areas (VAs) are properly secured. Maintenance of an exercise programme, stringent self-evaluation via CT exercise reports and decisively acting on lessons identified are key indicators of a dutyholder's understanding of the importance of an effective CT response. CT response drills should be undertaken regularly if staff and contractors are to be familiar with procedures, the actions to be taken and their responsibilities in the event of a real or suspected terrorist incident.
- 5.2 Exercising allows for personnel with emergency and CT responsibilities to be trained in the CTCP. It also provides an opportunity to rehearse the arrangements described in the CTCP and test their effectiveness. ONR-observed CTXs are a demonstration of capability and should not be used for training or rehearsal of plans.
- 5.3 The following is a list of the exercise-related elements that should be reflected in a dutyholder's CT arrangements. This list is neither exclusive nor exhaustive and will be subject to review and revision in light of operational experience.
 - 5.3.1 The requirement for an ONR-observed CTXs and for regular site CTXs (including shift exercises) is to be reflected in the corporate/company CT policy statement endorsed by the Board/Head of Company.
 - 5.3.2 With the agreement of ONR, those Category IV sites that have held a satisfactory live play CTX may substitute the following year's ONR-observed exercise with a table top exercise.
 - 5.3.3 A live-play, ONR-observed and evaluated CTX (other than a fire or evacuation practice), is to be carried out annually during the period 1 April to 31 March on a date agreed with the ONR Site Inspector.
 - 5.3.4 The annual ONR-observed CTX should also include activities normally delivered by the site's safety and emergency organisation, demonstrating its integration and interoperability with CT response.
 - 5.3.5 The ONR-observed CTX should be a part of an exercise programme that enables regular practice of the CTCP. Security training exercises should, therefore, be conducted throughout the year. Thorough self-assessment of these, especially if evaluated through independent audit, and evidence of learning from identified issues provide reassurance. The findings of all CTXs, ONR-observed or otherwise, should be reviewed objectively and learning points incorporated into relevant site contingency plans and instructions. Significant areas for improvement identified at a CTX may need to be reflected in the NSSP security improvement schedule (SIS).
 - 5.3.6 Concentrating security training into a small number of intensive periods immediately prior to an ONR-observed CTX should be avoided as it can undermine security awareness at a site. Details of any security training undertaken, whether for members of the emergency duty team, guards or any other personnel, should be recorded on individuals' training records. As part of the inspection the inspectors may wish to check these against the site training plan.
 - 5.3.7 ONR-observed CTXs should adequately demonstrate the dutyholder's capability to enact the CTCP in a timely, coordinated and effective manner.

- 5.3.8 On occasion, identifying a realistic scenario that meets all the requirements can be challenging. In such circumstances, consideration should be given to splitting the annual exercise into modules designed to test specific elements of the security regime. One means of achieving this is exercise phasing, see paragraph 5.17.
- 5.4 When organising the annual ONR-observed CTX, planners are to ensure that:
- 5.4.1 A date for the exercise is identified and agreed with the ONR security site inspector as early as possible, but no later than the November preceding the start of the exercise year. At sites where CNC authorised firearms officers (AFOs) are present, the CNC must agree on the date of the exercise to ensure that sufficient firearms instructors are available.
- 5.4.2 An initial planning meeting, excluding exercise participants, is held at least 6 months before the date of the exercise. The purpose of the meeting is to review progress on areas for improvement identified at the previous ONR-observed CTX, identify and agree the exercise objectives and agree an outline scenario. It is to be attended by the ONR security site inspector, where possible an ONR security emergency preparedness and response inspector, where appropriate a representative from the CNC and any other relevant stakeholders such as the local police Counter Terrorism Security Adviser.
- 5.4.3 Subsequent meetings to develop the scenario and to identify timelines etc are held, as required. ONR and/or CNC presence is not always necessary.
- 5.4.4 The CTX is planned such that communications, command and control of different elements of the response, the situational awareness of commanders at all levels and the operational interface with external authorities are tested. This enables dutyholders to demonstrate, and ONR to evaluate, that adequate arrangements are in place and relevant personnel understand their part in them. At Category I and HCVA sites the arrangements should be shown to reasonably ensure protection against all threats listed in the nuclear industries malicious capabilities planning assumptions (NIMCA) document. At other sites the arrangements may not be expected to defeat those threats but they provide a useful basis against which to develop an exercise scenario.
- 5.4.5 All elements of the security force are exercised. In addition, an agreed and meaningful proportion of the work force is involved through either the initial stages of the exercise, or the managed invacuation or evacuation of buildings or work areas.
- 5.4.7 An exercise instruction is produced and forwarded to reach ONR no later than four weeks prior to the date of the exercise.
- 5.5 ONR representation, usually the security site inspector, accompanied as appropriate by other inspectors and members of the ONR management team, will attend the site while the exercise takes place and for the debrief. An intervention record will also be written by the ONR security site inspector and forwarded to the site for action as necessary. Subsequently the site will be required to respond to the ONR report and submit its own exercise report to ONR, copied to the CNC where relevant. This should include lessons identified and the detail and proposed timescales for any remedial action required.
- 5.6 An exercise review meeting (to be attended by all relevant stakeholders) is to be organised six months after the exercise takes place. The purpose is to review progress against areas for improvement identified and the actions taken. It may be expedient to hold this meeting immediately prior to the initial planning meeting for the next exercise.

Objectives and Scenario

- 5.7 The exercise objectives and scenario are key and should be specific to the site. Prior to agreeing them, the security site inspector should consider previous ONR-observed exercises both in terms of the malicious scenario chosen, the elements of the CTCP which were tested and learning points arising. Over time all the arrangements in the CTCP should be demonstrated in a proportionate manner. It is preferable for sites to proactively use a mechanism, such as a matrix of exercise elements and performance, to take account of these factors.
- 5.8 Objectives and scenarios should take account of learning points arising from previous exercises, particularly those identified more than once. They should be chosen to demonstrate that the corrective actions taken have solved the issue(s) and have been implemented effectively.
- 5.9 Objectives and a scenario for the CTX are to be agreed with ONR in advance. The draft exercise objectives should be forwarded to the Site Inspector prior to the first planning meeting. The objectives are decided first and a scenario that allows them to be achieved is then developed. Some of the objectives should reflect the elements of the CTCP (and potentially the Emergency Plan) which are being exercised. Exercise objectives should be agreed by stakeholders, including ONR, and fixed no later than 5 months before the exercise. Any changes thereafter, for example to take account of a change in threat or site security arrangements, are to be agreed with ONR and other stakeholders.
- 5.10 Development of the scenario should take account of all stakeholders' needs, but must principally ensure the objectives can be achieved. When the scenario is agreed it should then be subject to formal change control. The agreement of all stakeholders, including ONR, should be obtained before making a change. The finalised scenario, as part of the exercise instruction, is to reach ONR no later than four weeks prior to the date of the exercise.
- 5.11 The objectives and scenario should be challenging and fully expose CT planning and response to a proper and rigorous examination. It should ensure that multiple elements of the CTCP, and potentially related elements of the emergency plan and/or handbook, are exercised together. Integrated command and control of the incident, involving different agencies, should be tested. This may include the central control room (CCR) (or equivalent), emergency control centre (ECC) (or equivalent), CNC on site, CNC Force Incident Manager (FIM), contract guard force (CGF) and external blue light responders such as local police and explosive ordnance disposal (EOD).
- 5.12 The objectives and scenario should require the exercise participants at all levels, from armed responders through guards to personnel in command roles, to think, not simply run through a routine set of actions, and make decisions, potentially based on incomplete information.

Malicious actors and the threat

- 5.13 ONR-observed CTXs are to be conducted with 'live-play' malicious actors. Their capability and intent will reflect the consequence of compromise (theft and sabotage) of the NM and facilities on the site. Where the consequences are high, ONR-observed CTXs should use a malicious capability that thoroughly tests the site's arrangements.
- 5.14 Malicious capabilities should be drawn from the extant NIMCA document. This is a series of assumptions, drawn from current evaluation of the threat, about the motivation, intentions and capability of potential insider/external adversaries who might

attempt unauthorised removal or sabotage of NM and facilities, and against which a protective security regime, including security exercises, is designed and evaluated.

- 5.15 The PADFOR handbook is complementary to NIMCA. It provides further guidance to assist the understanding of tactical detail by including potential malicious tactics, techniques and procedures. It does not provide a prescribed solution. Rather, it sets the conditions for development of a robust security framework by presenting credible, but adaptable, scenarios against which dutyholders may map their security regimes, including CTCPs.
- 5.16 The PADFOR handbook affords an opportunity for realistic, on-site exercises as well as scenario planning for training, and ONR-observed CTXs. For example the adversary mission statement and intent, which may be derived from PADFOR, can usefully shape exercise scenarios and affect the manner in which the adversary mission is carried out. The tactics and planning processes described in the handbook provide a valuable focus for exercises. Exercise controllers should consider using the planning formats articulated to realistically reflect NIMCA in the adversary capabilities.

Phasing

- 5.17 The phasing of exercises seeks to allow dutyholders flexibility in how the objectives are achieved. Potential benefits include assisting in the planning of joint Level 1 (safety) emergency exercises and CTXs, allowing greater free play in malicious action and armed response and utilising different scenarios in the same exercise to demonstrate distinct capabilities. The phases broadly comprise of:

- **Phase 1 - Immediate response.** Phase 1 allows the dutyholder, in conjunction with the CNC and/or other site-based responders, to demonstrate operational capability against a credible threat. Where applicable it will involve the AFOs and FIM, the CGF, the shift manager (SM) (or equivalent) and CCR, the site security control room (SSCR) (or equivalent) and the gatehouse. It may also include external blue light responders, especially at those sites at which the CNC is not deployed. It starts when the attack begins and typically ends when the threat is confirmed as neutralised, the lockdown is stood down or the SM hands over to the emergency controller (EC) (or equivalent). It may be used, for example, to validate timings in vulnerability assessments or demonstrate the effectiveness of the armed response. Phase 1 may be distinctly separate from phase 2 in order to allow freedom in the live play of the exercise. This may be preferable to constraining the exercise to a specific outcome required by the scenario to achieve particular objectives during phase 2.
- **Phase 2 – Incident Management.** Phase 2 allows the dutyholder to demonstrate effective incident management, integrated with all relevant supporting agencies. Where applicable it will involve the AFOs and FIM, CGF, ECC, SSCR, gatehouse and all the supporting agencies necessary to achieve the exercise objectives. The definition of the start and end will depend on the exercise objectives. However, it typically ends when the threat to the nuclear material or facilities has been reduced to the same level as applied before the start of the exercise, such as following disruption of an IED. During joint Level 1 emergency exercises/CTXs a break between phases 1 and 2 allows the armed response to succeed during the former, but assume it has failed for the latter, in order to generate a nuclear emergency. The same scenario or a completely different one can be used for each of the 2 phases.
- **Phase 3 – Post Incident Recovery.** Phase 3 allows the dutyholder to demonstrate an understanding of the post-incident implications to the NSSP, including crime scene management, and for the site or CNC where applicable to conduct the handover of a crime scene to the local Police. It typically

involves the same personnel as phase 2. Post incident recovery is a protracted affair and phase 3 would typically be exercised via a tabletop or command post exercise. As with phase 2, it may utilise the same scenario as earlier phases or have a completely different one, depending on the exercise objectives.

6 GUIDANCE ON INSPECTION OF COUNTER TERRORISM EXERCISES

- 6.1 This section of the guidance is to assist inspectors in evaluating the arrangements demonstrated by a CTX. The information below is neither exclusive nor exhaustive and will be subject to review in light of operational experience. It does, however, provide a framework for evaluating a demonstration CTX.
- 6.2 The evaluation of a CTX is normally undertaken by a small team of ONR inspectors. One of the full site exercises, undertaken as part of the dutyholder's CT response training programme, is used as the ONR-observed demonstration CTX. The purpose is to seek assurance that the dutyholder's CT arrangements and personnel involved in the response have the capability to deal effectively with malicious events. Such demonstration exercises are normally carried out annually on operational sites.
- 6.3 The CNC, CGF and dutyholder emergency staff should be rotated so that the same personnel do not participate in the ONR-observed CTX each year.

Why inspect a demonstration CTX?

- 6.4 Dutyholders should have robust internal audit processes in place that have identified and acted on areas for improvement in CT arrangements. The strength of this internal audit and the actions taken will influence an inspector's judgement on the efficacy of the CT arrangements at a site. However, such systems are primarily designed to meet a dutyholder's assurance requirements. A separate regulatory evaluation of the adequacy of the arrangements, and relevant personnel's knowledge of their part in them, is important.
- 6.5 An ONR-observed demonstration CTX is a single snapshot of the performance of one of the dutyholder's response teams. The exercise will typically deal with a single scenario, possibly in only one of several facilities, on a particular day. It is important, therefore, for site inspectors to form a view on the overall effectiveness of a site's CT arrangements in the context of continued readiness and the dutyholder's ability to respond to a real event at any time. An intense training period prior to a demonstration CTX is not the preferred approach.
- 6.6 The site inspector will, and the site internal audit function should, be keeping a watching brief on the dutyholder's CT preparedness training programme. This should include a programme of exercises that allow the dutyholder to evaluate its overall competence and capability. Taking a team to site enables ONR to subject the CTX to an in-depth inspection. The team can, simultaneously, cover all elements of the response and the interactions between them. However, while the team needs to be large enough to effectively evaluate the exercise, it should do so efficiently. Thus the size of the team is to be proportionate in respect of the priority attached to the intervention, based upon a targeted programme and the graded approach.

What do you have to do?

- 6.7 Before the exercise the ONR security site inspector will have agreed the objectives and scenario. Guidance on these is given at paragraphs 5.7 to 5.12. He or she should pass the exercise instruction, including the objectives and scenario, to the inspection team as soon as it is finalised to ensure the scenario, objectives and success criteria are fully understood.

- 6.8 To carry out an effective evaluation of the dutyholder's arrangements and the demonstration CTX, members of the ONR team should be suitably qualified and experienced. They should have completed the command and control "foundation" and "exercise evaluation" training courses provided by the EP&R team.
- 6.9 The team will decide in advance of the exercise which location(s) and/or aspects of the exercise each individual will observe. Typically the senior member of the team, usually a principal inspector, will be placed in the CCR and ECC (or equivalents) with the security site inspector and any others observing the live play armed response (if appropriate), the actions of the CGF in the gatehouse and SSCR (or equivalents), reception of emergency services and the effectiveness of the lockdown. The team should remain flexible in response to live play, observing and evaluating whatever happens. See Annex A for more detail.
- 6.10 Immediately prior to most exercises there will be a briefing and familiarisation visit. The ONR security site inspector is to liaise with the site and inform the team of these requirements. This should also allow members of the team less familiar with the site to conduct a tour of the relevant areas. It may be necessary to attend a specific briefing or complete training prior to entering certain areas, particularly if an inspector is unescorted.
- 6.11 All inspectors must keep a timed log of key events, actions and decisions at their location(s). Consolidating team members' information allows an overall picture to be drawn, eg the time between a site incursion occurring and a lockdown being called.
- 6.12 Exercises should normally be run until the dutyholder's exercise objectives have been fulfilled and the ONR team is satisfied it has seen enough to make a judgement about all relevant aspects. There will typically be a conversation between the exercise director and the senior member of the ONR team to agree an appropriate point at which to end the exercise. Sites will normally use a tannoy message or equivalent to communicate the end of the exercise to personnel.
- 6.13 Exercises will typically last for longer on sites with higher consequence for theft or sabotage. Bearing in mind the fatigue load on those taking part, and the fact they will have to immediately respond if a real event occurs soon thereafter, 4 hours is about the maximum for a Category I or HCVA site.

Making the judgement

- 6.14 When observing the exercise play all inspectors should bear in mind they will be asked to provide a judgement on the standard of the sections they observed. Comparison of performance and behaviours observed with the detail contained at Annex A is one method of making a judgement. However, inspectors should not be overly fettered by checklists and personal experience should also be brought to bear.
- 6.15 Immediately after the end of the exercise the ONR team will conduct a hot debrief among the members, not including site personnel. They will discuss their judgements and determine when different command and control (C2) nodes became aware of key events. By comparing individual notes the team can draw an overall picture and this may help individual inspectors place their own observations in context.
- 6.16 The team will then make an overall judgement on whether the duty holder has shown it could effectively deal with a real event and whether its arrangements were shown to be adequate. It is necessary to allow for the unreality (if any) of the scenario and inevitable exercise constraints and role-playing. The result will either be a satisfactory or unsatisfactory demonstration of the arrangements.

- 6.17 It is the ability to operate effectively, not the method by which individuals choose to operate, that is important. Personal styles, especially in command and control roles, should not affect the judgement. The key consideration in reaching an overall judgment is whether the arrangements are sufficient that the dutyholder, in conjunction with supporting agencies, would cope with a real event.
- 6.18 As part of the evaluation process, inspectors should determine whether exercising staff, including responders and those in command and control positions, are familiar with the CTCP and their responsibilities within it. Thus the effectiveness of implementation of training arrangements, which should themselves be described in the CTCP, can be inspected practically. Prior or subsequent examination of training records and internal assurance reports on CT training and exercising may assist in this regard. Inspectors should also be alert to performance during an exercise which indicates an area for improvement in the CTCP. For example if there is inappropriate or insufficient guidance for role holders on expected decisions or actions.
- 6.19 Having reached an overall judgement the team members should then each generate an evidence-based list of good practices and areas for improvement from their observations. The team leader will consolidate these lists in preparation for the joint ONR-site debrief. The team members should forward those lists in writing to the ONR security site inspector for inclusion, where appropriate, in the intervention record.
- 6.20 The joint ONR-site debrief provides an opportunity for the dutyholder, and supporting organisations, to self-critique and for the ONR team leader to provide feedback and make a judgement(s) on the adequacy of the arrangements demonstrated. Thus the dutyholder should take the lead, which also allows the inspectors to determine its ability to self-analyse. Any significant areas which the ONR team has noted, but which the dutyholder fails to mention, must be raised by the team leader.
- 6.21 It is neither necessary nor beneficial to emphasise an area for improvement which the dutyholder has clearly identified. In the case of a poor performance it is preferable for the dutyholder to suggest a redemonstration of certain aspects and invite ONR to observe, rather than ONR requiring the site to hold another demonstration CTX.

If the overall performance is judged inadequate

- 6.22 In the case of an unsatisfactory demonstration, the ONR team must decide, before the debrief, whether a full or partial redemonstration is required, after the dutyholder has addressed the issues. If a full demonstration is required the team should decide whether this is because of an inadequate CTCP, or elements thereof, or poor performance by the team on the day. If the former then the CTCP may need to be rewritten and resubmitted to ONR for approval. If the latter then the adequacy of training may need to be examined further, and it should not be limited to the exercising team.
- 6.23 Partial redemonstrations are typically appropriate where performance as a whole has been adequate. However some particular aspect or aspects of the exercise, which in the judgment of the inspectors is important enough to need to seek practical evidence of improvement, may have been inadequate.

Exercise report

- 6.24 ONR security site inspectors are to write the intervention record and send it to site. This exercise report should include relevant observations made by the inspection team and any regulatory issues raised against the site, with supporting evidence. It should include a timeline for sites to respond to the issues raised. The report is an input to the annual assessment of a dutyholders performance. Any regulatory issues raised are to

be recorded on the ONR regulatory issues database and tracked by security site inspectors. They may also be reflected in the NSSP SIS.

- 6.25 ONR expects dutyholders to respond in writing within 30 days of receiving the report. The response should include the dutyholder's own findings, including identified good practices and areas for improvement, of the exercise. It should also include an action plan to address deficiencies or vulnerabilities identified in both the ONR intervention record and its own report.

7 REFERENCES

1. **Nuclear Industries Security Regulations 2003.** Statutory Instrument 2003 No. 403
2. **Nuclear Industries Security (Amendment) Regulations 2006.** Statutory Instrument 2006 No. 2815
3. **Nuclear Industries Security (Amendment) Regulations 2013.** Statutory Instrument 2013 No. 190
4. **National Objectives, Requirements and Model Standards.** April 2014. Trim Folder 4.4.2.13778.

8 GLOSSARY AND ABBREVIATIONS

AFO	Authorised Firearms Officer
C2	Command and Control
CCR	Central Control Room
CGF	Contract Guard Force
CNC	Civil Nuclear Constabulary
CT	Counter-Terrorism
CTCP	Counter-Terrorism Contingency Plan
CTX	Counter-Terrorism Response Exercise
EC	Emergency Controller
ECC	Emergency Control Centre
EOD	Explosive Ordnance Disposal
EP&R	Emergency Preparedness and Response
HCVA	High Consequence Vital Area
IED	Improvised Explosive Device
FIM	Force Incident Manager
JESIP	Joint Emergency Services Interoperability Programme
NIMCA	Nuclear Industries Malicious Capabilities Planning Assumptions
NISR	Nuclear Industries Security Regulations
NM	Nuclear Material
NSSP	Nuclear Site Security Plan
ONR	Office for Nuclear Regulation
OUC	CNC Operational Unit Commander
PADFOR	Potential Adversary Forces handbook
PPE	Personal Protective Equipment
SM	Shift Manager (or Shift Charge Engineer etc)
SMART	Specific, Measurable, Achievable, Realistic, Time-bound
SSCR	Site Security Control Room
VA	Vital Area



ANNEX 1: AIDE MEMOIRE FOR INSPECTORS FOR DEMONSTRATION CTXs

A1 Introduction

A1.1 This aide memoire supplements the CTX TIG and provides inspectors with more detailed guidance on evaluating specific areas of a demonstration CTX. The information is neither exclusive nor exhaustive and will be subject to review in light of operational experience. It is not a 'tick list', but rather a framework for evaluation. It does not prevent inspectors from bringing their own experience to bear and evaluating and commenting on other relevant matters. It does, however, provide a range of aspects that can be examined during the course of a demonstration CTX.

A1.2 Under each area there are anticipated performance statements. Some of these could be viewed as essential, ie the absence of an aspect means the demonstration was inadequate, whereas others might be seen as desirable, repeatable good practice. However, it is for the inspection team to decide which, taking account of the characteristics of the site, the challenge presented by the exercise scenario etc.

A2 Aspects to be observed and evaluated

A2.1 The following locations, personnel and activities are covered:

- A2.2.1 Armed response and interoperability with site
- A2.2.2 Gatehouse / security lodge
- A2.2.3 SSCR
- A2.2.4 CGF
- A2.2.5 CCR
- A2.2.6 ECC
- A2.2.7 Command and Control
- A2.2.8 Communications
- A2.2.9 Lockdown
- A2.2.10 Cordon
- A2.2.11 Integration of safety and security response
- A2.2.12 Accounting for personnel
- A2.2.13 Casualties
- A2.2.14 Interoperability with blue light responders
- A2.2.15 Crime scene and witness management
- A2.2.16 Exercise management

A2.2.1 Armed response and interoperability with site

- AFOs neutralised armed intruders before they accessed NM or VA
- CNC acted in accordance with concept of operations, response plan and local operating procedures
- Effective, accurate and timely passage of information between CNC and site, and CNC and local Police
- CNC and CGF responsibilities were clearly delineated and their actions were complementary
- CNC integrated into ECC decision making and acted as trusted advisor
- If radioactivity has been released then protection of CNC responders (permitted dose rates etc) was duly considered

A2.2.2 Gatehouse / security lodge

- Carried out lockdown procedures promptly, securing entry and exit points etc where appropriate
- Prompt deployment of guards on tasks with appropriate briefs
- Clear, concise and timely briefs to SSCR and others, including blue light responders attending the site
- Carried out procedures effectively and in line with CTCP / assignment instructions
- Maintained an accurate and contemporaneous event / decision log
- Conducted effective dynamic risk assessments regarding personal safety and security of guards
- Proactively maintained accurate situational awareness
- Acted within delegated responsibilities, observing the chain of command
- Equipment was ergonomic and fit for purpose
- Effectively used situation and focus boards, operational mapping
- Used C2 principles outlined at A2.2.7 below and communications principles at A2.2.8.

A2.2.3 SSCR / PCR

- Prompt and accurate identification of threat and other relevant information, and onwards communication of the same
- Providing timely intelligence to responders, including CNC where deployed
- CCTV system and other sensors enabled accurate situational awareness
- Carried out procedures effectively and in line with CTCP / assignment instructions / response plan
- Prioritised tasks effectively, made sound and timely decisions based on available information
- Maintained an accurate and contemporaneous event / decision log
- Initiated lockdown in a timely manner (where appropriate)
- Delivered clear, concise and timely briefs to other C2 nodes and first responders
- Proactively maintained accurate situational awareness
- Effectively used focus boards, operational mapping
- Effective use of all technical equipment (AACS, CCTV recording etc)
- Equipment was ergonomic and fit for purpose
- Used C2 principles outlined at A2.2.7 below and communications principles at A2.2.8.

A2.2.4 CGF

- Acquainted with their part in the CTCP and assignment instructions, carrying out procedures effectively in line with both
- Deployed swiftly on task with relevant equipment and correct PPE
- Familiar with operation of all equipment relevant to role
- Maintained situational and personal safety awareness
- Communicated effectively, succinctly and clearly
- Maintained a personal event / decision log (pocketbook)
- Acted within delegated responsibilities, observing the chain of command
- Aware of and acted taking account of crime scene management considerations

A2.2.5 CCR

- Used C2 principles outlined at A2.2.7 below and communications principles at A2.2.8.
- SM and others familiar with the CTCP and followed it as appropriate

- Timely and accurate conversation(s) between SM and FIM
- Proactively maintained accurate situational awareness and interpreted information appropriately
- Made timely decisions using available information, setting suitable priorities
- Accurate and effective use of situation, focus and action boards, updating frequently and actively managing actions to completion
- Actions were SMART had a person responsible and time for completion
- Accurate, timely and succinct flow of information within the CCR, with other C2 nodes and with external responders
- Suitable delegation of tasks within the CCR and to other personnel on site
- Anticipated future requirements, taking account of likely and worst case scenarios
- Controller led the team and controlled the incident while maintaining a strategic focus
- Equipment was ergonomic and fit for purpose
- Maintained an accurate and contemporaneous log (possibly by simply printing the situation and actions boards before information was overwritten)

A2.2.6 ECC

- Used C2 principles outlined at A2.2.7 below and communications principles at A2.2.8.
- EC and others familiar with the CTCP and followed it as appropriate
- Timely and accurate conversation(s) between EC and FIM
- Proactively maintained accurate situational awareness and interpreted information appropriately
- Made timely decisions using available information, setting suitable priorities
- Accurate and effective use of situation, focus and action boards, updating frequently and actively managing actions to completion
- Actions were SMART had a person responsible and time for completion
- Accurate, timely and succinct flow of information within the ECC, with other C2 nodes and with external responders
- Suitable delegation of tasks within the ECC and to other personnel on site
- Anticipated future requirements, taking account of likely and worst case scenarios, creating actions to deal with former and assigning resources / developing contingency plans to cater for the latter
- Controller led the team and controlled the incident while maintaining a strategic focus
- Equipment was ergonomic and fit for purpose

A2.2.7 Command and control

- The strategic intent / focus was clear and known
- A calm operating environment was evident in C2 nodes
- Situational awareness throughout was accurate
- The right decisions were made in a timely manner based on available information to hand; important decisions were not delayed for the want of perfect information
- Individual's roles within C2 node teams were well-defined
- People were free to anticipate and act within the intent of the controller's focus but were not extensively 'self-tasking'
- Commanders at all levels stepped back to take account of the bigger picture
- Handover between CCR and ECC was neither too soon, the ECC was ready and in possession of enough facts, nor too late, the CCR was not overwhelmed.

- Clearly delineated responsibilities between armed responders, external responders and site, always clear who is the supporting and who is the supported commander
- Protocol briefings were timely, accurate and disciplined, providing accurate situation updates, restating the focus and prioritising outstanding actions

A2.2.8 Communications

- Notifications to internal responders, other site personnel and emergency services were made in a timely manner and in accordance with relevant plans
- Effective use of 3-way communications for passage of important information
- Clear, concise and timely briefings to blue light responders arriving at site
- Accurate handover briefing(s) between CCR and ECC
- Site tannoy messages were necessary, clear, concise, and audible to all relevant personnel, and made in a timely manner
- Tannoys or other communications did not divulge useful information to adversaries
- Radio procedures were effective, enabling accurate and timely passage of important information
- Signal for radio coverage was adequate and enabled effective communications

A2.2.9 Lockdown

- The decision to lockdown was made promptly and by somebody duly authorised
- All personnel on site were promptly informed of the need to lockdown
- All personnel on site were aware of the meaning of lockdown, as it applies to the site
- Lockdown was achieved in a timely manner and accurately confirmed as complete
- All relevant buildings were locked and, where necessary, entrances staffed
- Any movement necessary after lockdown was necessary, subject to appropriate permissions and properly coordinated
- Lockdown did not unduly hinder the actions of emergency responders
- Lockdown was lifted in a timely manner

A2.2.10 Cordon

- Confirm – the incident (IED etc) and the position were accurately identified and confirmed
- Clear – the correct area was cleared of personnel prior to the cordon being set
- Cordon – the cordon was clearly delineated, accurately sited at the correct distance from the suspect device, managed and staffed where necessary to prevent re-entry
- Control – entry to the cordon was only permitted to people duly authorised
- Check – all aspects of the cordon were verified as correctly implemented and working
- Staff implementing and controlling the cordon were well-briefed and appropriately equipped to conduct their role, there were enough to manage the cordon effectively
- Secondary hazards within the cordon area were identified and, where necessary, further cordons were established around them with further evacuation etc
- Personnel were evacuated using safe routes, the routes and evacuation points having been confirmed clear beforehand
- Personnel were briefed accurately prior to evacuation and accounted for at the evacuation point

- A cordon incident control point (ICP) was established with controlled access to nominated individuals (eg EOD)

A2.2.11 Integration of safety and security response

- The CTCP was complementary to the emergency plan and handbook and arrangements within either one did not interfere with those in another
- Site was able to staff the ECC while at lockdown
- Site was able to account for people, where necessary, while at lockdown
- Dynamic risk assessments were conducted in relation to emergency responders (site or external) carrying out remedial actions taking due cognisance of the threat
- Responders were able to move safely and securely around site, at lockdown if necessary
- Appropriate, risk-based decisions were made in relation to shutting down certain plant at risk from malicious acts. Such decisions took account of the potential direct impact on plants and the indirect impact of secondary hazards
- All relevant personnel were familiar with the CTCP and their part in it
- Where deployed, CNC commanders (eg FIM and OUC) were full and proper members of site C2 nodes, they were practised in that role and staff in those nodes knew how best to employ them
- The views of local police commanders were duly considered in site C2 nodes
- Safety control points including facility control centre, incident/access/forward control point etc were checked for malicious activity before use and subsequently protected in the case of an enduring threat

A2.2.12 Accounting for personnel

- Site was able to account for any personnel in a cordon area to confirm it was clear or make an informed decision about tolerating the risk to people in buildings within the cordon as more acceptable than the risk of evacuating
- Site could account for personnel who were affected by the malicious act and/or involved in the response to it
- Any staff evacuated from a cordon area were accounted for after evacuating
- Any physical muster points or other evacuation points are checked for secondary devices / malicious activity before use
- Site could account for personnel when at lockdown
- Personnel accounting processes took account of and could identify unauthorised persons

A2.2.13 Casualties

- Casualty locations and numbers were promptly identified and confirmed
- Casualty status was quickly determined, confirmed and accurately reported
- Appropriate equipment was available to the right people to treat casualties
- Casualties were treated effectively at the scene by SQEP personnel and removed from further danger where necessary and when safe to do so
- Casualties were evacuated from site in the most timely manner possible and in any event inside the golden hour
- Site could deal appropriately with contaminated casualties and weapons etc

A2.2.14 Interoperability with blue light responders

- There was evidence of prior engagement with external blue light responders
- External blue light responders were, where necessary, allowed access to site in a timely manner, including while the site was at lockdown

- First responders were requested in a timely manner and briefed accurately when requested and on arrival, using appropriate maps and aids
- Arrival of external responders was briefed (eg to the gatehouse) and anticipated
- Responders received a technical brief on the hazards posed by the site, the security hazards posed by the malicious event and safe routes
- Rendezvous point (RVP) for responders was identified and cleared, they were escorted to it where necessary
- SM and/or EC were aware of intent and actions of responders and felt able to challenge where it conflicted with their own intent
- ECC took account of emergency services resources and factored it into plans
- JESIP terminology was reflected in briefings for first responders

A2.2.15 Crime scene and witness management

- Access to potential crime scenes, including the access point for malicious actors, site of any firefight or IEDs etc, was appropriately secured in order to leave forensic evidence undisturbed.
- Site gave due consideration to and acted on local police advice for securing the crime scene
- Site had given prior consideration to crime scene management (ie personnel were acting against a plan rather than learning it for the first time)
- Site had a plan to deal with continued (potentially days or weeks) restricted access to affected areas of site
- Timely identification of witnesses
- Witnesses segregated, reassured, welfare need cared for and kept away from C2 nodes
- Essential information taken from witnesses in a timely but sensitive manner
- Police, and any other relevant blue light responder, afforded timely access to witnesses
- Crime scene management took account of on-going nuclear safety or security considerations

A2.2.16 Exercise management

- The exercise was planned in accordance with paragraphs 5.4.1 to 5.4.7 above
- The scenario was adequately controlled and participants were not aware of it
- The exercise initiation was a surprise to the participants and effective in that the requisite alarms were activated
- Umpires and observers were well-managed did not interfere with the scenario or achievement of exercise objectives
- The exercise did not emphasise training over demonstration of capability
- Exercise participants were not pre-deployed to make the response more effective, such as armed responders near an armed incursion or staff in the vicinity of the ECC to save moving around site at lockdown