

July 31, 2006

MEMORANDUM TO: Nader L. Mamish, Deputy Director
for Emergency Preparedness
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

FROM: Joseph D. Anderson, Security Interface Team Leader */RA/*
Licensing and Regulatory Improvements Branch
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SUBJECT: SUMMARY OF JULY 20, 2006, CATEGORY 2 MEETING WITH
NUCLEAR ENERGY INSTITUTE (NEI) AND LICENSEES ON
PROPOSED CHANGES TO EMERGENCY PREPAREDNESS
COMPONENT OF FORCE-ON-FORCE EXERCISES

On July 20, 2006, a Category 2 public meeting was held between the NRC and representatives from the Nuclear Energy Institute (NEI), licensees, and other interested parties at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, MD. A listing of meeting attendees is enclosed (ADAMS Accession No.: ML062020553).

The purpose of the meeting was to discuss and obtain feedback on proposed changes to NRC Inspection Procedure (IP) Attachment 71114.07, "Force-on-Force (FOF) Exercise Evaluation" (ADAMS Accession No.: ML061780379). The NRC staff is proposing changes to IP Attachment 71114.07 based on the industry's voluntary implementation of baseline security event drills at each site over a 3-year period, as described in Attachment 5 to Industry White Paper, entitled "Enhancements to Emergency Preparedness Programs for Hostile Actions," Revised November 18, 2005 (ADAMS Accession No.: ML053290326).

As an introduction to the meeting, NRC staff highlighted that the intent of the IP revision is to eliminate the existing table-top portion (post event recovery activities) from the emergency preparedness (EP) component of FOF exercises. The staff believes that these activities will be more effectively demonstrated as part of the baseline site security event-based drills. The IP revision would also limit demonstration of EP activities to the duration of the security response component (i.e., EP play would end concurrent with the termination of security activities following the neutralization of adversaries). The staff further indicated its intent to review IP Attachment 71114.07 following the completion of the baseline security event drills.

In addition to various administrative changes, NEI and licensees provided the following feedback based on a review of the draft IP Attachment 71114.07:

- Consider a revision to the FOF Physical Protection Significance Determination Process for Power Reactors to provide further guidance on the demonstration of licensee actions to mitigate the consequences of a postulated release in the unlikely event the target set is achieved by the composite adversary force.
- Include reference to Supplement 1 to Regulatory Issue Summary (RIS) 2004-15, "Emergency Preparedness Issues: Post-9/11," under the listing of good practices to enhance the development and conduct of the EP component of FOF exercises.
- Provide further clarification regarding the demonstration of actions by designated on-shift staff whose response to the control room may be prohibited due to the postulated scenario.
- For NRC notifications, include a reference to the Industry White Paper, dated November 18, 2005, which supplements NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events" (ADAMS Accession No. ML051740058). In addition, revise the discussion to reflect an accelerated call, rather than notification, to the NRC in accordance with the Industry White Paper. This call is being performed as an industry initiative and is not currently required under existing NRC safeguards or operating event reporting regulations for operating nuclear power reactors.
- Revise the reference to licensee's hostile threat procedures to reflect generic "imminent threat" terminology, which is consistent with the security advisories that were issued.
- Provide further clarification on the extent of play related to the assessment of the impact of a radiological release on the public.
- Revise terminology under the demonstration of Control Room Response to reflect operations response strategies and operator actions, rather than accident mitigation strategies or actions, to be consistent with the intended scope of the EP component of the FOF exercises.

N. Mamish

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The NRC staff indicated that the draft IP Attachment 71114.07 has also been forwarded to the NRC Regions for review, and that industry comments would be evaluated for incorporation as part of the regional comments.

CONTACT: Joseph D. Anderson, NSIR/DPR
301-415-4114

Enclosure: List of Attendees

cc: D. Wilcox (DHS)

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301-415-4114

Enclosure: List of Attendees

cc: D. Wilcox (DHS)

DISTRIBUTION:

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SISP Review Completed: Joseph D. Anderson

ADAMS Accession No.: ML062020701 (**Package**)
ML062020681 (**Memo**)
ML062020553 (**Attendees**)

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