



NUCLEAR ENERGY INSTITUTE

Marvin S. Fertel
SENIOR VICE PRESIDENT AND
CHIEF NUCLEAR OFFICER

August 30, 2006

Mr. Roy P. Zimmerman
Director, Office of Nuclear Security
and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. Robert B. Stephan
Assistant Secretary
for Infrastructure Protection
Department of Homeland Security
Washington, DC 20528

SUBJECT: Request for NRC and DHS Endorsement of NEI 06-04, Revision 0,
*Guideline for the Development of EP Drill and Exercise Threat-Based
Scenarios*, August 2006

PROJECT NUMBER: 689

Dear Messrs. Zimmerman and Stephan:

The Nuclear Energy Institute (NEI)¹ Emergency Preparedness and Security Working Groups, after consultation with NRC and DHS staff, have developed an industry program and implementation guidance for the integration and demonstration of emergency response activities to threat-based event scenarios. Enclosed for the NRC and DHS endorsement is NEI 06-04, Revision 0, *Guideline for the Development of EP Drill and Exercise Threat-Based Scenarios*, August 2006.

The Nuclear Sector Specific Plan (NSSP), which is being developed by the nuclear sector to support the recently issued National Infrastructure Protection Plan (NIPP), has as one of its main goals, "to enhance the ability of the federal, state, territorial, local, tribal, and private sector to effectively respond to nuclear and radiological emergencies as a result of terrorist attacks, natural disasters or other incidents." This program and guideline support the NSSP objective to incorporate emergency preparedness security-based scenarios into the EP drill and exercise programs for commercial nuclear power reactors.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

The NEI program and guideline were developed with support from industry personnel, state and local responders, observers from interested states, and NRC and DHS representatives and sets in motion an exercise program that will further strengthen emergency preparedness across the nation. The guideline is also consistent with the direction provided to the NRC staff in the June 29, 2006, Staff Requirements Memo (SRM).

NEI 06-04 includes guidance on the preparation for conduct of drills and exercises, and the evaluation of Emergency Response Organization (ERO) responses to a range of threat-based events. As part of the initial phase of this effort, pilot drills were conducted, including tabletops at Diablo Canyon, Duane Arnold, North Anna, and Vermont Yankee nuclear power plants, culminating with an actual integrated facility drill at the Callaway Station on March 1, 2006.

Following each of the pilot tabletops and the integrated drill demonstration, discussions were held with state and local participants, and observers from other states including representatives from California, Illinois, Iowa, Maryland, Massachusetts, Missouri, New Hampshire, North Carolina, Pennsylvania, Vermont, and Virginia, as well as DHS and NRC personnel, to review program attributes and lessons learned. Each critique item was evaluated and incorporated into NEI 06-04 as appropriate.

The planned next phase will result in each site performing a site-specific drill involving a security event-based scenario over the next three years, beginning in September 2006. These drills would not be conducted as part of a biennial exercise but rather during an off-year exercise or drill. The NRC and DHS are welcome to participate and observe at their discretion. In keeping with the NRC's Regulatory Oversight Process, it is intended that ERO members assigned to fill Key Positions be granted credit for ERO Participation when they have taken part in a security event-based drill conducted in accordance with the guideline. During this phase, NEI will track the schedule for security event-based drills, coordinate a workshop to support consistent application of the guideline, and keep the NRC and DHS informed of lessons learned.

With regard to final implementation of the program, responses to NRC Bulletin 2005-02 stated that licensees would incorporate a biennial exercise, consisting of a security event-based scenario, based on NRC and DHS endorsement of the drill and exercise guideline. Once NEI 06-04 is formally endorsed, the industry would include a security-based exercise as one of the three required exercises during the six-year cycle beginning in September 2009. The industry is seeking NRC and DHS endorsement by September 1, 2007.

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The industry appreciates NRC and DHS participation, insights, and support during the development of this important step forward, ensuring an enhanced level of preparedness for the nation.

If you have any questions, please contact me or Alan Nelson at (202) 739.8110; apn@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Marvin S. Fertel". The signature is fluid and cursive.

Marvin S. Fertel

Enclosure

c: Mr. Eric Leeds, Director, Division of Preparedness and Response, NRC
Mr. Craig Conklin, Director, Office of Infrastructure Protection
Preparedness Directorate, DHS
Mr. Anthony Pietrangelo, Vice President, Regulatory Affairs, NEI