

**U.S. Nuclear Regulatory Commission (NRC) Comments on Nuclear Energy Institute (NEI)
Concept Paper, “Proposed Approach to Evaluating Security Personnel Response to Adversary
Use of Hostages”**

Page	Paragraph	Comment
1	1	The paper uses the term “Tabletop Exercise.” This is a misnomer. The correct title should be “Table-top Drill.” The drill term comports with long-standing understanding of the difference between an exercise and drill. In addition, the term “Tabletop Simulations” is later introduced. The paper lacks clarity on the difference, if any, between “Tabletop Exercise” and “Tabletop Simulations.” Recommend changing “Tabletop Exercise” and “Table-top Drill” to “Tabletop Exercises” and “Table-top Drills.”
1	2	Page 1, Paragraph 2: The following sentence: <i>It is not clear how the Systematic Approach to Training methodology detailed in Regulatory Guide (RG) 5.75, “Training and Qualification of Security Personnel at Nuclear Power Plants,”</i> was used to support the use of table-top drills and discussions to evaluate this tactic. If the intent of the review is to evaluate the licensee’s security force response, recommend changing “evaluate this tactic” to “evaluate security personnel response to the use of hostages by an adversary force.” Need to elaborate on what RG 5.75 says about training to better indicate the relevance of your comment.
1	3	Page 1, Paragraph 3: Table-top drills and discussions may not satisfy the Physical Security Plan requirement that an adequate response strategy be demonstrated, especially regarding the <u>actions</u> of the following personnel: armed security officers, armed responders, search train personnel, and Independent Spent Fuel Storage Installation personnel, etc. Recommend changing from “especially regarding” to “specifically when evaluating ...” Need to elaborate more on how table-top drills and discussions may not satisfy the Physical Security Plan and regarding the actions of the personnel involved.

Enclosure

Page	Paragraph	Comment
1	4	It is unclear how this alternative approach would be implemented industry-wide (e.g., 50.54(p) versus an NEI 03-12 template change). Need to elaborate on how this approach would be implemented industry-wide.
1	5	Page 1, Paragraph 5: The paper does not give any details as to how the drill will be conducted, especially concerning how the disciplines such as operations, security, emergency planning, etc., would be involved. Recommend changing “not give” to “not provide.”
2	1	Page 2, Paragraph 1: In light of these weaknesses, the staff also concludes that performance-based limited scope exercises rather than table-top drills and discussions should be used to assess the hostage tactic. Recommend changing to “in light of these weaknesses, the staff concludes that a licensee should use performance-based limited scope drills instead of table-top exercises to assess the site’s security force response to the hostage tactic.”
General Comments		In the NRC response letter, the beginning of the letter uses the term “potential weaknesses.” At the end of the letter, however, the statement is made “in light of these weaknesses.” You might want to consider either using “potential” in both places, or not at all just for the sake of consistency. We would offer the observation in response to the NEI paper based on our experience from the Indian Point Integrated Pilot Comprehensive Exercise (IPCE). We believe that Multiple Integrated Laser Engagement System (MILES) equipment can be used and controlled effectively using only the halo and harness without a weapon; and using “god guns” or M4s with small arms transmitters for exercise controllers. During the Indian Point IPCE, law enforcement players used the NRC-provided MILES gear in this configuration and we encountered no problems related to MILES control.