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Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities

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General Comment

- 1) There are utilities in the industry that have full time adversary force members. Duke Energy would propose that language should be added to the Drill and Exercise portion so that participation in FOF activities may be fulfilled by participation as an adversary.
- 2) We need a definition of "full security response force" for the definition of FOF exercises. The fully integrated exercise limits this to the minimum committed numbers. We would propose that the full security response would include all members assigned to a specific team or platoon that may be on duty at one time. There is currently not a definition and is left to individual interpretation.

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