

April 14, 2016

Mr. David R. Kline
Director, Security
Nuclear Energy Institute
1201 F Street, NW, Suite 1100
Washington, DC 20004

SUBJECT: RESULTS OF THE U.S. NUCLEAR REGULATORY COMMISSION'S
TECHNICAL REVIEW OF NEI 05-05, "CONTROLLER GUIDELINE FOR
FORCE-ON-FORCE EXERCISE SIMULATIONS," REVISION 5, DATED
DECEMBER 2015

Dear Mr. Kline:

I am writing you to provide the results of our initial technical review of the Nuclear Energy Institute (NEI) document, NEI 05-05, Revision 5, "Controller Guideline for Force-on-Force Exercise Simulations," dated December 2015.

We completed our initial technical review and recognize that there have been significant revisions of this document from the previous version. We would like to meet with your staff to gain a better understanding of the basis for these changes and to further understand the potential scope changes for the guidance. For example, various sections such as "command and control," "rules of conduct," and "controllers' roles and responsibilities" have been removed from the guidance. In addition, sections discussing controlling exercise actions, player control issues, and rules of engagement have also been removed. We consider that this information is essential to ensure that force-on-force (FOF) exercises are designed and conducted to meet the requirements stated in Appendix B to Title 10 of the *Code of Federal Regulations* Part 73, Section VI.C.3, "Performance Evaluation Program."

The document also contains a considerable amount of new information, which is primarily focused on various weapons types, their respective effects/impact, and industry standard control measures. We would like to understand your rationale for the emphasis on weapons modeling and table tops in this document. The weapons effects/impact tables do not appear to represent actual weapons engagements such as qualification scores or the results of FOF exercises as provided in Multiple Integrated Laser Engagement System reports.

U.S. Nuclear Regulatory Commission (NRC) staff also would like to understand the rationale for including references to Addendum 5 and NEI 03-11 in the document's introduction.

D. Kline

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The NRC staff welcomes further discussion with NEI about these concerns and extends an invitation to meet together at a time and place convenient to you. Should you have any questions or concerns related to this letter, please contact Daniel Cardenas at (301) 287-0756 or Daniel.Cardenas@nrc.gov.

Sincerely,

/RA/

Michael C. Layton, Director
Division of Security Operations
Office of Nuclear Security and Incident Response

D. Kline

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Sincerely,

/RA/

Michael C. Layton, Director
Division of Security Operations
Office of Nuclear Security and Incident Response

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