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May 3, 2016

Mr. Michael C. Layton
Director, Division of Security Operations
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Response to SRM Addressing SECY 14-088

Project Number: 689

Dear Mr. Layton:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to comment on the NRC Security Working Group Response to Staff Requirements Memorandum (SRM) SECY-14-088. The industry has identified six areas for comment: Composite Adversary Force (CAF) tactics, techniques, and procedures; mock adversary training and qualification standards; controller training and qualification standards; post exercise critique guidance; mission planning training and qualification standards; and Operational Experience (OE) sharing.

Regarding Composite Adversary Force (CAF) tactics, techniques, and procedures, the first paragraph on page two states in part, "...the working group did not identify gaps between the TTPs used by the NRC CAF during FOF exercises and the methods used in real-life adversary training and actual attacks." This

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.

Mr. Michael C. Layton

May 3, 2016

Page 2

finding is again stated in the first paragraph on page four of the letter. The report also contains a table at the bottom of page three to illustrate this point; however, the table identifies attributes at such a high level that it provides no useful comparison to the clear meaning of the attribute and the tactics employed by the CAF. To the contrary, the industry has raised concerns when there have been attempts to introduce tactics, techniques, or procedures not supported by any intelligence provided to the industry. In some cases, the proposed tactics or techniques were unlikely to produce effective and repeatable results and we do not think that they would be considered by a planner.

Regarding mock adversary training and qualification standards, the industry believes that this is beyond the assigned mission from the Commission in SECY-14-088. Furthermore, based on the performance of the licensees during NRC evaluated Triennial FOF Exercises, there does not appear to be a deficiency in performance that would indicate a gap in the training and qualification of the licensee adversary forces. No evidence has been provided to support the need for standard training and qualification for licensee mock adversary forces. The industry believes that licensees should address mock adversary training through the already endorsed Systematic Approach to Training (SAT) process. Some sites may require more training than others based on performance evaluation.

Regarding controller training and qualifications standards, the industry believes that this is beyond the assigned mission from the Commission in SECY-14-088. In accordance with the SAT process, licensees have identified critical tasks and frequencies and conduct training and qualification for their exercise controllers as described in Regulatory Guide (RG) 5.75, NEI 03-11 (Revision 4) and NEI 05-05 (Revision 4). The third paragraph on page six of the letter addresses "Significant controller issues..." and lists three items to support a conclusion that NRC guidance is needed. The industry does not believe that these are industry generic issues, rather they are examples by and large isolated to one or two sites. The industry does have concerns with identifying consistent control measures for new or uncommon tactics and techniques.

Regarding post exercise critique guidance, the working group expresses its belief that "...a more structured, formal critique process will help licensees better incorporate improvements..." In January 2014, NEI issued a white paper providing guidance on a revised critique process to better engage site management and ensure effective identification of improvement opportunities. NEI issued NEI 03-11 (Revision 3) which incorporated the guidance from the white paper in January 2015. The industry has not received any feedback indicating deficiencies or concerns with this process.

Regarding mission planning training and qualification standards discussed on page seven of the letter, the industry has several issues with this section. The letter correctly describes the process for mission planning as described in the inspection procedure; however, the inspection team provides the CAF director a mission plan describing the route, target set, and specific tactics to employ. The CAF simply converts the completed plan into a mission narrative and provides it to the licensee who uses it to

Mr. Michael C. Layton

May 3, 2016

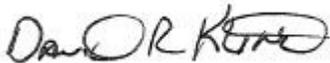
Page 3

create an exercise matrix. The CAF is providing limited planning. To the extent that such training is needed, it should be addressed by licensees for internal CAF and NEI for the National CAF utilizing a SAT type process.

Regarding the development of formal information sharing program for Operational Experience (OE), the letter states that "...a program to share operational information and experience for FOF does not exist." To the contrary, NEI 12-03, "Security Operating Experience Submittal Guideline," provides both format and guidance for the submittal of all security OE, including FOF OE. Once submitted, this OE is posted on a protected site to which all licensees have access. Submittal of FOF OE is tracked to ensure all licensees participate.

If you have any questions or require additional information, please contact Richard Speer at (202) 739-8121; rjs@nei.org or me.

Sincerely,

A handwritten signature in black ink that reads "David R. Kline". The signature is written in a cursive style with some capital letters.

David R. Kline

c: NRC Document Control Desk