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Sent: Tuesday, May 03, 2016 11:38 AM

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

~~SECURITY RELATED INFORMATION – WITHHOLD~~
~~UNDER 10 CFR 2.390~~

**THE ATTACHED PDF FILE CONTAINS COMPLETE CONTENTS OF
THE LETTER**

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) 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 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.

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