

July 15, 2016

Mr. Michael J. Cosenza
Department Leader, Nuclear Security Programs
Palo Verde Nuclear Generating Station
5801 S. Wintersburg Road, MS 7002
Tonopah, AZ 85354-7529

SUBJECT: RESPONSE TO A DISAGREEMENT WITH ADVERSARY CHARACTERISTICS,
ATTRIBUTES, OR TACTICS EMPLOYED OR PREPARED AS PART OF AN
NRC-EVALUATED FORCE-ON-FORCE EXERCISE – DISPUTED ITEM
05000528,529,530/2016-01

Dear Mr. Cosenza:

Thank you for the discussion in the teleconference on July 14, 2016, with the Division of Security Operations (DSO), Security Performance Evaluation Branch regarding your disagreement with adversary characteristics, attributes, or tactics employed or prepared in accordance with U.S. Nuclear Regulatory Commission (NRC) Inspection Procedure 71130.03, "Contingency Response – Force-on-Force Testing," as part of an NRC-evaluated force-on-force (FOF) exercise.

In this teleconference you disputed a tactic, technique, or procedure (TTP) within Scenario 1 developed by an NRC FOF inspection team.

The NRC has carefully reviewed your escalation and concluded that the disputed TTP is approved for use within the NRC-evaluated exercise scenario for the following reasons: (1) it is within the design basis threat; (2) it is supported by available data; (3) it is within your program requirements to provide defense-in-depth; (4) it can be safely performed and controlled; and (5) it provides a credible and realistic challenge to your site's protective strategy.

If you would like to appeal this decision, provide a written response within 3 days from the date of this letter with the basis of your appeal to the Director, DSO.

Sincerely,

/RA/

Joseph Willis, Branch Chief (Acting)
Security Performance Evaluation Branch
Division of Security Operations
Office of Nuclear Security and Incident Response

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| DATE | 7/ 14 /2016 | 7/ 15 /2016 |

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