

August 19, 2016

Mr. Steve Sovizral, Manager, Nuclear Security  
Luminant Generation Company, LLC  
Comanche Peak Nuclear Power Plant  
Mail Code X02  
6322 North FM 56  
Glen Rose, TX 76043

SUBJECT: RESPONSE TO FORMAL DISAGREEMENT WITH ADVERSARY  
CHARACTERISTICS, ATTRIBUTES, OR TACTICS EMPLOYED OR  
PREPARED AS PART OF AN NRC-EVALUATED FORCE-ON-FORCE  
EXERCISE – DISPUTED ITEM 05000445,446/2016-01

Dear Mr. Sovizral:

Thank you for your letter dated August 17, 2016, to the Division of Security Operations (DSO), Security Performance Evaluation Branch titled “Formal Disagreement with Adversary Characteristics, Attributes, or Tactics Employed or Prepared as Part of an NRC-Evaluated Force-on-Force Exercise,” in accordance with Addendum 4 of the U.S. Nuclear Regulatory Commission (NRC) Inspection Procedure 71130.03, “Contingency Response – Force-on-Force Testing.”

In your letter you dispute a tactic, technique, or procedure (TTP) within Scenario 1 and 2 developed by an NRC Force-on-Force inspection team.

The NRC has carefully reviewed your formal 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

August 19, 2016

Mr. Steve Sovizral, Manager, Nuclear Security  
Luminant Generation Company, LLC  
Comanche Peak Nuclear Power Plant  
Mail Code X02  
6322 North FM 56  
Glen Rose, TX 76043

SUBJECT: RESPONSE TO FORMAL DISAGREEMENT WITH ADVERSARY  
CHARACTERISTICS, ATTRIBUTES, OR TACTICS EMPLOYED OR  
PREPARED AS PART OF AN NRC-EVALUATED FORCE-ON-FORCE  
EXERCISE – DISPUTED ITEM 05000445,446/2016-01

Dear Mr. Sovizral:

Thank you for your letter dated August 17, 2016, to the Division of Security Operations (DSO), Security Performance Evaluation Branch titled “Formal Disagreement with Adversary Characteristics, Attributes, or Tactics Employed or Prepared as Part of an NRC-Evaluated Force-on-Force Exercise,” in accordance with Addendum 4 of the U.S. Nuclear Regulatory Commission (NRC) Inspection Procedure 71130.03, “Contingency Response – Force-on-Force Testing.”

In your letter you dispute a tactic, technique, or procedure (TTP) within Scenario 1 and 2 developed by an NRC Force-on-Force inspection team.

The NRC has carefully reviewed your formal 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

**ADAMS Accession No. ML16232A032**

OFFICE	NSIR/DSO/SPEB	NSIR/DSO/SPEB
NAME	J. Berry	J. Willis
DATE	8/17/2016	8/ 19 /2016

**OFFICIAL RECORD COPY**