

August 26, 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 YOUR APPEAL OF THE FORMAL DISAGREEMENT WITH  
ADVERSARY CHARACTERISTICS, ATTRIBUTES, OR TACTICS EMPLOYED  
OR PREPARED AS PART OF A U.S. NUCLEAR REGULATORY COMMISSION  
EVALUATED FORCE-ON-FORCE EXERCISE – DISPUTED ITEM  
05000445,446/2016-01

Dear Mr. Sovizral:

Thank you for your email dated August 24, 2016. The Division of Security Operations received your appeal to the U.S. Nuclear Regulatory Commission's (NRC) initial response, dated August 18, 2016, related to your "Formal Disagreement with Adversary Characteristics, Attributes, or Tactics Employed or Prepared as Part of an NRC Force-on-Force Evaluated Exercise," in accordance with Addendum 4 of NRC Inspection Procedure 71130.03, "Contingency Response – Force-on-Force Testing."

In your original letter dated August 17, 2016, you dispute a tactic, technique, or procedure (TTP) within Scenarios 1 and 2 developed by the NRC force-on-force inspection team.

The NRC carefully reviewed your appeal to the initial decision, and concluded that the disputed TTP is approved for use within the NRC-evaluated 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 ability 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.

Sincerely,

***/RA A. Pretzello for/***

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

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Sincerely,

*/RA A. Pretzello for/*

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

**ADAMS Accession No.: ML16239A106**

OFFICE	NSIR/DSO/SPEB	NSIR/DSO	NSIR/DSO
NAME	R. Dexter	J. Willis	M. Layton (DPretzello for)
DATE	8 / 26 / 16	8 / 26 / 16	8 / 26 / 16

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