

March 22, 2017

Mr. Rob White  
Security Director  
Northern States Power Company - Minnesota  
414 Nicollet Mall – 7<sup>th</sup> Floor  
Minneapolis, MN 55401

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 05000282/2017201 AND 05000306/2017201

Dear Mr. White,

Thank you for your email sent on March 20, 2017, to the Division of Security Operations (DSO), Security Performance Evaluation Branch with the attachment “Formal Disagreement with Adversary Characteristics, Attributes, or Tactics Employed or Prepared as Part of an NRC-Evaluated Force-on-Force Exercise” (safeguards encrypted), 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 attachment you dispute a tactic, technique, or procedure (TTP) within Scenario 1 developed by a 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,

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Andrew Pretzello, Deputy Director  
Division of Security Operations  
Office of Nuclear Security and Incident Response

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DATED: March 22, 2017

**ADAMS ACCESSION NUMBER: ML17081A188**

<b>OFFICE</b>	NSIR/DSO/SPEB	NSIR/DSO/SPEB	NSIR/DSO
<b>NAME</b>	J. Berry	C. Johnson	D. Pretzello
<b>SIGNATURE</b>			
<b>DATE</b>	3 / 22 /2017	3 / 22 /2017	3 / 22 /2017

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