

March 24, 2017

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

SUBJECT: RESPONSE TO NORTHERN STATE POWER COMPANY'S 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 05000282/2017201 AND 05000306/2017201

Dear Mr. White:

Thank you for your phone call on March 23, 2017, to discuss Northern State Power Company's appeal to the U.S. Nuclear Regulatory Commission's (NRC) initial response, dated March 22, 2017, 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 email dated March 20, 2017, Northern State Power Company disputes a tactic, technique, or procedure (TTP) within Scenario 1 developed by the NRC Force-on-Force (FOF) inspection team.

The NRC carefully reviewed the appeal to the initial decision, and concluded that at this time, the disputed TTP is not approved for use within NRC-evaluated Scenario 1 until the pending update to Regulatory Guide 5.69, "Guidance for the Application of the Radiological Sabotage Design Basis Threat in the Design, Development and Implementation of a Physical Protection Program," is issued. I expect the updated regulatory guide to include guidance that will clarify that the disputed TTP is acceptable for future FOF exercise scenarios.

Sincerely,

/RA S. West for/

Brian E. Holian, Director
Office of Nuclear Security and Incident Response

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DATE March 24, 2017

ADAMS Accession No. ML17083A096

OFFICE	NSIR/DSO/SPEB	NSIR/DSO/SPEB	NSIR/DSO	NSIR
NAME	RRichardson	CJohnson	DPretzello	BHolian (SWest for)
DATE	3 / 24 / 17	3 / 24 / 17	3 / 24 / 17	3 / 24 / 17

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