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May 2, 2017

Ms. Marissa Bailey
Director, Division of Security Operations
Office of Nuclear Security and Incident Preparedness
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Additional Information Concerning Attachments 2 and 3 of NEI Letter, "Industry Recommendations Related to Memorandum, 'Staff Requirements – SECY-16-0073 – Options and Recommendations for the Force-on-Force Inspection Program in Response to SRM-SECY-14-0088,'" dated January 26, 2017

Project Number: 689

Dear Ms. Bailey:

The NRC staff conducted a public and closed meeting on April 20, 2017, to discuss the status of the security baseline inspection program assessment being performed in response to memorandum, "Staff Requirements – SECY-16-0073 – Options and Recommendations for the Force-on-Force Inspection Program," and to solicit stakeholder input for use in developing the assessment. During discussions with industry representatives, the staff asked several questions regarding the recommendations contained in the subject letter. It was agreed that the staff's understanding of the recommendations described in Attachments 2 and 3 of the letter would benefit from the availability of additional clarifying information. This letter provides the information necessary to better understand those recommendations.

Regarding Attachment 2, "Recommendations for Improving the Effectiveness and Efficiency of the FOF Exercise Inspection Schedule," the following information is provided.

- Advisors from the U.S. Special Operations Command (SOCOM) should be available to participate in the "Site Tours" portion of the proposed schedule, approximately 4 weeks prior to the exercise. The advisors would either accompany the Composite Adversary Force (CAF) Director on the tours, or be available to provide information to the Director.
- When the "Site Tours," occurring at approximately 4 weeks prior to exercise, are conducted, the

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condition of site will be that in which the exercises will be conducted; no changes to the site protective strategy and supporting aspects of the physical security program will be made after this point (a.k.a., this point marks the "snapshot in time" for exercise planning purposes).

- During the introduction of the inspection team (no later than 16 weeks prior to the exercise), the licensee will provide an agreed upon set of information needed by the staff to begin exercise planning, and make a trusted agent available to answer questions.
- A licensee would submit the required number of exercise scenarios using the proposed schedule.

Regarding Attachment 3, "Recommendation for Conducting a Defense-in-Depth FOF Exercise," NEI and the industry support a reduction in the number of Force-on-Force Exercises during the triennial inspection to one. We believe this change is warranted given the maturity and demonstrated effectiveness of site physical protection programs, and the requirements of the performance evaluation programs established by licensees. In addition, based on staff feedback provided in the April 20 meeting, the industry understands that the proposed demonstration of site protective strategy defense-in-depth during an FOF exercise inspection may not be feasible.

If you have any questions or require additional information, please contact AJ Clore at (202) 739-8025; ajc@nei.org or me.

Sincerely,



William R. Gross

cc: Mr. Andrew Pretzello, NSIR/DSO, NRC
Mr. Clay Johnson, NSIR/DSO/SPEB, NRC
NRC Document Control Desk