

SAFEGUARDS INFORMATION

May 12, 2017

Mr. Timothy Herrmann, Site Vice President
Ameren Missouri
Callaway Plant
P.O. Box 620
Fulton, MO 65251

SUBJECT: RESPONSE TO FORMAL DISAGREEMENT AND APPEAL WITH ADVERSARY CHARACTERISTICS, ATTRIBUTES, OR TACTICS EMPLOYED OR PREPARED AS PART OF AN NRC-EVALUATED FORCE-ON-FORCE EXERCISE – DISPUTED ITEM 05000483/2017201-01

Dear Mr. Herrmann:

This letter provides the U.S. Nuclear Regulatory Commission's (NRC) staff's formal response to your disagreement with a tactic, technique or procedure (TTP), and subsequent appeal of the staff's decision, consistent with NRC Inspection Procedure 71130.03 "Contingency Response – Force-on-Force Testing." By letter, dated May 9, 2017, titled "Formal Disagreement with Adversary Characteristics, Attributes, or Tactics Employed or Prepared as Part of an NRC-Evaluated Force-on-Force Exercise," you disputed a TTP within Scenario 1 developed by the NRC Force-on-Force inspection team.

The NRC carefully reviewed your dispute, 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. The NRC's detailed response to your appeal has been entered into the NRC Response to Disputed Item Database, Disputed Item 05000483/2017201-01, and is provided as Enclosure 1 to this letter, marked Safeguards Information.

The enclosure transmitted herewith contains Safeguards Information. When separated from the enclosure, this transmittal document is decontrolled.

SAFEGUARDS INFORMATION

SAFEGUARDS INFORMATION

T. Herrmann

2

Upon notification by Robert Johnson, Branch Chief, Security Performance Evaluation Branch, Division of Security Operations of the NRC's decision that the disputed TTP was approved for use, you requested to appeal the decision to me. I received your appeal via phone call on May 9, 2017. After further discussion the NRC carefully reevaluated your dispute and determined that the disputed item is still appropriate for use in an NRC-evaluated Force-on-Force exercise.

Sincerely,

/RA/

Marissa Bailey, Director
Division of Security Operations
Office of Nuclear Security and Incident Response

Enclosure:
NRC Response to Disputed Item
05000483/2017201-01

cc w/enclosure: Billy Brown, Site Security Manager

SAFEGUARDS INFORMATION

SAFEGUARDS INFORMATION

T. Herrmann

3

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DATE: May 12, 2017

DISTRIBUTION:

J. Groom, DRS, RIV

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OFFICE	NSIR/DSO/SPEB	NSIR/DSO/SPEB	NSIR/DSO/SPEB	NSIR/DSO
NAME	A. Woyansky	J. Berry (EByre for)	C. Johnson (JWillis for)	M. Bailey
DATE	5/10/17	5 / 12 /17	5 / 12 /17	5 / 12 /17

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