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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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PUBLIC MEETING

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STATUS OF SECURITY BASELINE INSPECTION PROGRAM
ASSESSMENT IN RESPONSE TO SRM-SECY-16-0073

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WEDNESDAY, JULY 12, 2017

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ROCKVILLE, MARYLAND

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The meeting was held in the Commissioners' Hearing Room at the Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, at 8:00 a.m.

PRESENT FROM THE NRC:

- JIM ANDERSEN
- MARISSA BAILEY
- MIKE BUCKLEY
- LOUIS CUBELLIS
- CLAY JOHNSON
- TODD KEENE
- ANDREW PRETZELLO
- ALISON RIVERA
- DARRELL ROBERTS

ALSO PRESENT:

A.J. CLORE, NEI

CHRIS KELLEY, Exelon

ED LYMAN, Union of Concerned Scientists

CHRIS NEWTON, Duke Energy

MICHAEL WHITLOCK, Dominion Energy

DAVID YOUNG, NEI

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P R O C E E D I N G S

8:09 a.m.

1
2
3 MR. ANDERSEN: -- any force-on-force
4 exercises that we do from the enforcement perspective.

5 Not to say that we would not having any findings, but
6 maybe that the level of the finding or the severity
7 of the finding would be reduced depending on if the
8 licensee had an approved methodology and could show
9 that, in that exercise, it would have impacted the
10 results.

11 So that's Option 2. In Option 3, it goes
12 on and allows SEMA to do a little bit more. The other
13 part of the purpose of SEMA that NEI provided was to
14 inform vulnerability assessments, and, by informing
15 those vulnerability assessments, it would inform their
16 strategic plans and possibly strategic plan changes
17 that they could make. So Option 3 kind of includes
18 Option 2 but then goes a step further in allowing credit
19 for the SEMA methodology to support strategic plan ---
20 potentially strategic plan changes down the road. So
21 that's Option 3.

22 And then Option 4, since the Commission
23 asked us to evaluate integrated response, and over the
24 course of the last number of years, we've had that more
25 on a voluntarily basis, and in --- few sites have

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1 participated. Actually, a number of sites have
2 participated in contingency response tools with the
3 FBI developing those tools onsite. So we're probably
4 over half the sites, I believe, have participated in
5 that activity. And then a much smaller number of sites
6 have participated in limited exercises, you know,
7 probably a handful of sites participating in limited
8 exercises with local law enforcement to exercise those
9 types of things. So Option 4 would basically be some
10 type of regulatory framework approach rulemaking.

11 To be honest, I think we're still putting
12 --- the whole rulemaking process will do this if the
13 Commission decides to go down this path, what the rule
14 will look like when it gets to the tail-end of the
15 rulemaking process. But initially, my thought was that
16 they would have some sort of minimum level of what
17 everyone needs to do.

18 We would encourage licensees to reach out,
19 and if they can get an MOU with local law enforcement
20 or FBI put in place, that would be a piece of it. And
21 then it would grate it up, so if you wanted to do some
22 sort of crediting of local law enforcement, the rule
23 would have the requirements as part of the rule package.

24 So that one's, you know, again, in
25 development a little bit. Rulemaking is never an easy

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1 task. When we go through it, it's a lot of resources,
2 so we'd have to consider that if the staff were going
3 to recommend that option.

4 So, that's the four options we've kind of
5 laid out to this point. Again, you know, the paper
6 is due, Todd, in September, October?

7 MR. KEENE: October 4th.

8 MR. ANDERSEN: October 4th to the
9 Commission. So, you know, we're very close to starting
10 to put -- actually, we have put pen to paper already
11 and we're very close to actually getting it into the
12 concurrence process.

13 But before we put it into the concurrence
14 process, we wanted to have this meeting to get feedback
15 from our external stakeholders at this point.

16 We've gotten a lot of feedback from our
17 internal stakeholders. There's still a lot
18 responding, too.

19 So, maybe I'll pause there for a second
20 and see if there's any questions in the room. And maybe
21 we can open it up to see if there's any questions on
22 the line as well. So, let's start in the room first.

23 MR. YOUNG: David Young, NEI.

24 Could you just maybe elaborate a bit more
25 on -- so, Two would be consideration for force-on-force

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1 exercises. Three would be consideration for
2 vulnerability assessments.

3 So, if you combine Two and Three, how does
4 that look different from Four? Where does Four go
5 beyond the combination of Two and Three?

6 MR. ANDERSEN: Yes. Four puts the
7 requirements that we deem necessary into a rulemaking
8 and establishes some sort of minimum threshold for all
9 plants for integrated response-type of activities,
10 where Two and Three would be strictly voluntary.

11 MR. YOUNG: Okay. Voluntary and in
12 guidance.

13 MR. ANDERSEN: And I should mention before
14 I take another question, due to the, you know, we're
15 very close -- like I said, we're writing the paper right
16 now, so, you know, right now is my intent, at least,
17 to recommend to the Commission if we recommend Two or
18 Three, that that would also include a pilot.

19 That we pilot Option 2 and Option 3, if
20 we recommended those, that's actually in the pros and
21 cons for the paper. We probably say "pilot" in both
22 of them.

23 And then we would come back to the
24 Commission at a later date with the results of that
25 pilot and, you know, permission to go forward.

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1 So, that's my thinking right now on Two
2 and Three. And I should have said that up front,
3 because that changes things a little bit.

4 Another question?

5 MR. LYMAN: Yeah. This is Ed Lyman.

6 So, with regard to the difference between
7 Two and Three, I thought I heard you say so with Two,
8 you would just use the LLEA credit to -- for a
9 significant determination of the findings.

10 But Three, it sounded like you were
11 actually changing the allowed defensive strategy so
12 there would no longer be a denial of task on the part
13 of the licensee, but maybe just contained in their --
14 a delay in communicate, something like that. So, is
15 that --

16 MR. ANDERSEN: It's not so much delay in
17 communicate, it's more of -- under a lot of scenarios
18 it takes a long time to get to core damage.

19 And in those scenarios, I think it's
20 reasonable that, you know, local law enforcement, FBI,
21 will show up on site and be able to assist the licensee
22 in moving personnel around the site, to maybe hook up
23 FLEX-type equipment, and arrest potential core damage
24 before it would happen.

25 So, that's the type of scenario we're

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1 thinking about for that piece of it.

2 MR. LYMAN: All right. So, right now the
3 licensee has to protect against radiological sabotage,
4 which means protection against significant core damage
5 or radiological sabotage.

6 So, what this would mean was the definition
7 of that would no longer be prevention of destruction
8 of entire target set, but it would allow destruction
9 of the target set provided that there was a finding
10 or showing that they would be able to mitigate that
11 before significant core damage occurred to the set.

12 MR. ANDERSEN: Right. There would still
13 be a finding that they've lost the target set, but they
14 still must protect against --

15 MR. LYMAN: Option 3.

16 MR. ANDERSEN: They would have to defend
17 against the DBT. It would just be when we evaluate
18 the finding, there would be a reduction --

19 MR. LYMAN: Oh, I thought that was Option
20 2.

21 MR. ANDERSEN: That is Option 2.

22 MR. LYMAN: Right. So, Option 3 would be
23 a change in the allowed defensive strategy.

24 MR. ANDERSEN: No.

25 MR. LYMAN: Okay.

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1 MR. ANDERSEN: They would still have to
2 defend against the DBT, but in evaluating the -- they
3 could take credit for additional -- potentially
4 additional operator actions or mitigated -- or
5 mitigative actions.

6 It really puts more of a cap on how long
7 is -- does the licensee have to, you know, defend before
8 local law enforcement will come in to assist.

9 MR. LYMAN: So, then I'm confused about
10 the difference between Two and Three.

11 MR. ANDERSEN: Yeah.

12 MR. LYMAN: Sounds like they're the same,
13 I think.

14 MR. ANDERSEN: Maybe it's just the way I'm
15 describing them. All right.

16 MR. LYMAN: Are any of the options, would
17 they change the fundamental requirement that you have
18 to protect -- the licensee has to protect against
19 radiological sabotage, meaning significant core
20 damage?

21 MR. ANDERSEN: No. Although the licensee
22 must protect against that, it's just that in defending
23 against that, we'd allow them to take additional credit
24 for other things.

25 MR. LYMAN: I'm not sure I understand.

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1 MR. ANDERSEN: Okay. Any other question
2 from the room before we open it up to the --

3 MR. KEENE: Shirley, if you could open up
4 the phone lines to see if anybody on the line has any
5 questions?

6 THE OPERATOR: Certainly. If you have a
7 question on the phone line at this time, just press
8 star followed by one. Thank you. And that's star
9 followed by one, and record your name clearly.

10 One moment, please, for our first question.

11 THE OPERATOR: And at this time, I'm
12 showing no questions on the phone line.

13 MR. KEENE: Thank you, Shirley.

14 MR. ANDERSEN: Thanks, Todd.

15 Before I turn it over to Clay or Marissa
16 to start going into the force-on-force and security
17 baseline piece, I just -- some of our initial thoughts
18 on the SEMA methodology, there's some discussion in
19 the document about how you gather the data to do the
20 methodology.

21 And there's discussion about kind of the
22 option to the licensees for how they do that and the
23 periodicity they do that.

24 And I think a number of our comments that
25 we'll be providing and much more specifics are going

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1 to be around that in that, you know, the staff believes
2 there should be some sort of demonstration and periodic
3 training-type thing that, you know, people are going
4 to change, forces are going to change.

5 So, there's got to be some sort of periodic
6 review, periodic demonstration to validate -- if
7 "validate" is the right word -- the numbers that are
8 into the methodology.

9 So, we'll get into that in a little bit
10 more detail in the second half of this meeting, but
11 that's kind of -- from a big picture, I think that's
12 where a number of our comments are going to come from.

13 And with that, unless there's additional
14 questions, I'm sending it back to you. Clay, looks
15 like you're on the bottom end of the boulder or whatever
16 you want to call it.

17 MR. JOHNSON: Okay. From the last
18 discussions we've had, there's really been one change
19 to the three options for force-on-force and that is
20 combining -- we blended our 2A and 2B into a single
21 option. So, I'll walk sort of through the three options
22 that we have now.

23 The first option -- is your handout -- the
24 handout was put out a couple weeks ago when we first
25 came up with it. The only real difference is that 2B

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1 -- what we have listed as 2A and 2B, 2B is not going
2 to be discussed in our paper.

3 It's just going to be -- why don't I --
4 it's been NEI has a concept and we felt the
5 defense-in-depth initiation had been fully integrated
6 and we'll just add that Option 2 is what it's based
7 on.

8 So, we call that a 2B, but it's primarily
9 based on NEI's submission. And that was what that was
10 meant to be focused on. So, it wasn't adding to the
11 conversation.

12 And I'll go through some of how we
13 characterized Option 2. You'll see it's really a
14 blending of the two.

15 For Option 1, it's primarily the
16 force-on-force program we have now. With all of our
17 options at the high level, we are implementing changes.

18 We're looking at the SDPs, we're changing
19 inspection procedures, we're looking at the overall
20 baseline inspection program, reducing redundancies,
21 things along those lines.

22 So, that happens for all three options.
23 So, the high level, there are changes occurring, but
24 Option 1 is effectively the force-on-force program we
25 have now. It's two exercises. It's a planning week,

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1 it's an exercise week.

2 Option 2 really blended our 2A and 2B.
3 It is a planning week and exercise week. We are
4 planning two exercises.

5 As part of that planning, we are putting
6 a placeholder in the second exercise to start halfway
7 through it. That gives you your defense-in-depth
8 portion.

9 If the first exercise during exercise week
10 is effective, the second exercise will be done as a
11 defense-in-depth, which means adversaries start close
12 in.

13 We will shift the exercise to where there's
14 no external evaluation. This also means that because
15 we are bypassing all external defenses to look at
16 defense-in-depth, loss of the target set is not the
17 regulatory problem. It would be focused on command
18 and control, situation awareness, interdiction,
19 redirects. It's all the functionality of response
20 internally.

21 If the first exercise was anything other
22 than effective, the second exercise would be run as
23 planned. So, it would effectively be very similar to
24 today's force-on-force.

25 For this, some work is going to have to

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1 be conducted on the significance determination process,
2 because we don't currently have an SDP that covers
3 defense-in-depth. So, modifications would occur to
4 the significance determination process for
5 force-on-force and for the defense-in-depth.

6 Option 3. Option 3 provides us with two
7 opportunities to evaluate the site protective strategy.

8 The force-on-force would be planning week,
9 exercise week, one exercise. So, very similar to what
10 is done now, except it's only planning and executing
11 one exercise.

12 At a later time, the NRC inspection team,
13 hopefully the same inspection team, will observe a
14 licensee -- will inspect a licensee-run annual
15 exercise. It will be evaluated the same way we do the
16 force-on-force now.

17 There will have to be some modifications
18 with the licensee's planned and conducted exercise.
19 We may have to work with the planning documents.

20 If there was a problem in the first NRC-led
21 force-on-force, we may work with the licensee to
22 specifically evaluate some aspect. And that sort of
23 covers a follow-up piece. So, there are still details
24 to be worked out there.

25 But one NRC force-on-force exercise very

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1 similar to what's done today, and then attending and
2 inspecting a licensee-led force-on-force.

3 So, again, changes to significance
4 determination process would be needed, a new inspection
5 procedure probably for the evaluation of the
6 licensee-run force-on-force. So, lots of work to do
7 there.

8 The staff is currently leaning towards
9 Option 3, but we would like feedback on pros, cons,
10 unintended consequences for all three options.

11 We received some good feedback in previous
12 letters, but we're looking for anything that --
13 sometimes it's invisible to us what a cost is. So,
14 we will need you to be looking for and to bring forward
15 any hidden costs that you're unaware of in terms of
16 -- one of the proposals the staff intends to accept
17 is the CAF showing up early so that all the work could
18 be done during normal working hours the previous week.

19
20 Is there a hidden cost in the number of
21 CAF members just given exercise schedules? We're not
22 aware of that, but we're seeking feedback.

23 The other piece that we're planning on
24 accepting is having a CAF director embedded with the
25 team to alleviate some of the time that's required to

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1 actually conduct some of the planning operations.

2 So, I mean, those were proposals, but they
3 came without explanation of cost or benefit, but
4 initially it looks good to the staff.

5 MS. BAILEY: Before we open it up to
6 questions, I think what I'd like to do is just summarize
7 the three options and emphasize a couple of things.

8 First of all, the three options that the
9 staff is considering maintains this concept of having
10 to look at the -- to evaluate the effectiveness of the
11 licensee strategy.

12 The first option's status quo, we do have
13 the two NRC-conducted exercises. The second option,
14 plan for two NRC-conducted exercises, but will be a
15 defense-in-depth exercise if that first exercise ends
16 up being effective.

17 And then the third option is one
18 NRC-conducted exercise and an evaluation of one of the
19 licensee's annual exercises.

20 And one other thing that I want to emphasize
21 with that one is that evaluation is an inspection.
22 We wanted to make sure that you're all aware of that.

23 So, those are the changes I wanted to
24 highlight.

25 MR. ANDERSEN: Okay. Questions at the

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1 table.

2 MR. CLORE: Thanks, Clay and Marissa.
3 This is A.J. Clore with NEI. Just a couple high-level
4 questions you might be able to answer now or might not
5 be fully vetted.

6 In regards to scheduling of the -- looking
7 at the site's observed or led exercise following the
8 initial one, have we looked at -- have you guys talked
9 about time frames in when you would come back to the
10 site after the initial exercise?

11 The reason I bring that up is I -- we talked
12 a little bit yesterday, was there are some utilities
13 that purposely schedule their annual exercises around
14 weather. Certain sites have inclement weather.

15 There are other utilities who actually
16 schedule the bulk of their annual exercises in certain
17 quarters of the year to kind of knock them all out.
18 That's just one we thought we'd consider.

19 I know we had talked about, you know, we
20 have, you know, look at three months or a calendar year,
21 what would be best preferential -- I think from an
22 industry standpoint, I think a calendar year would be
23 the most beneficial in regards to efficiencies and
24 resources, because a lot of sites are doing what they
25 do now.

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1 Most people already know that already, but
2 that way it wouldn't be, you know, an example I could
3 use -- I'll use Chris for an example.

4 Some of the northern sites, which FOF was
5 in, say, November, three months will put you in
6 February, which probably isn't the most, you know,
7 pleasurable in February in upstate New York. But
8 that's just something we talked a little about yesterday
9 and things to scheduling.

10 And I'll turn it over to you if you have
11 thought about that or if there's just a concern we have
12 or a thought.

13 MR. JOHNSON: Great question. It has come
14 up. There's been some intense discussions on how the
15 scheduling would work.

16 We do realize, you know, weather events,
17 outages can have an impact. It makes the scheduling
18 a little more complicated.

19 And because we're now putting the schedule
20 in RPS and all the licensees are aware of those
21 schedules, it's published, we're going to have to work
22 very closely with the regions to coordinate with the
23 sites so that we can make every attempt to ensure we
24 don't end up at -- one of my favorite nights was D.C.
25 Cook on January -- I think it was 7th, listening to

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1 the ice flows build up.

2 So, trying to work through that issue is
3 going to require more planning. And that's the real
4 key to it. Will it always be successful? Probably
5 not. So, we need to plan for that.

6 One of the considerations on Option 3 and
7 the way we laid it out for the normal force-on-force
8 process, there's a lot of in-depth assessment that goes
9 on in the planning week. The protective strategies,
10 the lock-downs, all of that that occurs informs what
11 happens next.

12 So, if we end up in a circumstance where
13 an evaluation of a licensee's annual exercise occurs
14 before, we may have to figure out how we swap that
15 assessment to happen prior to the licensee's and then
16 truncate what happens during the NRC force-on-force.

17 So, we're going to have to be a little bit
18 flexible in figuring out the full schedule. It hasn't
19 been fully thought out, but it will require far more
20 planning between the region's headquarters and the
21 licensee's.

22 MR. CLORE: Thank you.

23 MR. NEWTON: Yeah. Well, just to
24 piggyback on that -- Chris Newton from Duke Energy --
25 we have to work with the region now for the 05 schedule

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1 and send them a list of all our annual exercises
2 upcoming.

3 That's something we can honestly share with
4 the region now with NSIR to help facilitate that
5 scheduling.

6 And when you look at when that observed
7 exercise would occur, talk about hidden costs, we
8 wouldn't have to schedule an additional exercise just
9 to meet our official time frame there.

10 So, that would be one thing to consider
11 --

12 MR. JOHNSON: Absolutely. We haven't
13 settled on, you know, within a month or within six
14 months. That's still a remaining detail we need to
15 work out.

16 There is no intent to have a special annual
17 exercise above and beyond what's currently required.

18
19 MR. CLORE: Clay, just another quick
20 question.

21 In current practice, you know, if weather
22 dictates Night 1 being moved to Night 2 and if the
23 exercise is effective, the inspection team is
24 satisfied, a question for Option 3 if there's just one
25 night of the inspection team for force-on-force, if

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1 weather were to dictate that exercise, how would --
2 I guess what would be the path forward after that?

3 Would it be if the inspection team came
4 to the observed -- or licensee-led exercise, would that
5 be sufficient enough just inspecting that if weather
6 dictated the first night of the initial week?

7 MR. JOHNSON: We still have to do the
8 NRC-led force-on-force exercise.

9 MR. CLORE: Sure.

10 MR. JOHNSON: So, options available are
11 stay an extra day. Or in cases where we've had
12 blizzards that locked down the site for a week, we would
13 have to reschedule.

14 MR. CLORE: Okay.

15 MR. LYMAN: So, doesn't the NRC already
16 inspect, to some extent, the licensee's exercises and
17 how is what you're proposing different from what you
18 do now?

19 MR. JOHNSON: We have an inspection
20 procedure that does look at licensees' drills and
21 exercises. This is a different procedure.

22 It is modeled after our inspection
23 procedure 71130.03, which is the force-on-force
24 contingency response inspection.

25 The 05, which you're referring to, focuses

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1 more on the performance evaluation program, which is
2 Part 73, Appendix B. That is a training program, and
3 the focus is more on training and evaluation. How are
4 their responders being trained anywhere from CAF and
5 TAF to command and control.

6 So, the focus is different. We're looking
7 at prevention of radiological sabotage against the DBT.

8 There's no intent to replace the current 05 inspection
9 procedure with this.

10 MR. LYMAN: I have a question about what
11 I think of as defense-in-depth is. So, you pass the
12 first exercise and then you would want to modify the
13 second by, you know, reducing the number of responders
14 or increasing the adversary characteristics or
15 something, but the objective should be the same.

16 You want to see if perturbing the first
17 response would then also lead to a successful outcome.

18 So, I don't understand why you would say the evaluation
19 would be different than the defense-in-depth.

20 MR. JOHNSON: The -- since we are not
21 evaluating, we are bypassing the external strategy.
22 So, all the external defenses, which we have shown
23 through five cycles, are pretty significant.

24 We would be starting a force internal to
25 the fight strategy. So, there's no way to -- there's

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1 no way to hold a licensee accountable for loss of a
2 target set if we are not evaluating the full strategy.

3 So, the focus is really on the command and control
4 and the internal actions.

5 In many -- in a significant number of our
6 current force-on-force, everything ends somewhere at
7 the protected area. So, we're looking beyond that.
8 We're looking at the internal strategy -- simply by
9 bypassing what they currently have, the target set is
10 not the objective of the evaluation.

11 Any other questions here?

12 MR. KELLEY: The observed exercise will
13 be part of an inspected process. Is that going to fall
14 under the 03 or the 05? And would it be a separate
15 inspection report, or would it be the same inspection
16 report?

17 MR. JOHNSON: Great question. Lots of
18 discussion internally. I am going to have to give you
19 sort of a guess, because we're still working out some
20 of the implementation details.

21 I think that we lean towards a separate
22 inspection procedure. It's not the 03, not the 05,
23 which may result in two inspection reports.

24 There's simplicity with that, but it is
25 advantageous.

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1 MR. KELLEY: Sure. Another question.
2 Chris Kelley from Exelon.

3 So, we're talking about embedded or hidden
4 costs and I think having the CAF directors involved
5 is a good idea. It probably would expedite the
6 development of the mission planning.

7 But we do pay cost, travel per diem cost,
8 for times that the CAF team, you know, are in travel
9 status and on site. So, moving them in a week earlier,
10 I don't know if we're going to gain enough from that
11 to justify the cost of putting them up for a week.

12 If the director is there, we've been pretty
13 effective over the weekend between when they come on
14 site to do the, you know, the drills and the dry runs
15 with them -- with the controller.

16 So, I'm not sure that a week on site would
17 be cost-justified, in my mind.

18 MR. JOHNSON: Great comment. And that's
19 the feedback we're looking for. Okay. I appreciate
20 that comment.

21 If somebody could provide even a
22 qualitative description of that, it would be greatly
23 appreciated. And we can be sure to include it in the
24 paper, because right now our plan is to accept NEI's
25 proposal.

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1 So, if there's some downside to that, we
2 need to know.

3 MS. BAILEY: I also appreciate that
4 comment. One of their -- the Commission directed us
5 to focus on efficiencies.

6 And when we're developing this option, I
7 think it's easy for us -- or easier for us to
8 characterize what the efficiencies are for the NRC,
9 but it's not so easy what the impact is in terms of
10 efficiencies for the industry.

11 So, any feedback that we can get from
12 industry on what are the efficiencies for any of the
13 three options would be helpful.

14 MR. KELLEY: Thanks. A second question
15 or comment is in reviewing the various options as, you
16 know, currently we run the exercises, we break into
17 a series of hot washes.

18 We typically then do a critique with the
19 entire force at the end of the exercise. And then the
20 day after the final exercise, there's a management
21 critique with the site senior leadership team.

22 Are we going to continue with that process
23 if we go with Option 3?

24 MR. JOHNSON: Yes.

25 MR. KELLEY: So, there would still be a

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1 management critique at the end with the site leadership
2 team. Okay.

3 MR. CLORE: This is A.J. from NEI again.
4 Just a quick add-on to Chris and Clay. You guys can
5 share this if you have a vision.

6 Just I guess in regards to the critique
7 and things like that, could you, I guess, map out what
8 your vision looks like for the planning week and
9 exercise week under Option 3?

10 Is there a lot of changes in regards to
11 what those were?

12 MR. JOHNSON: For the NRC led?

13 MR. CLORE: Yes. Like, I know there's a
14 -- I believe in the one proposal it was hours on site
15 for the NRC and stuff. I know that the way things are
16 set up in this area, does the vision you have of the
17 planning week have any wholesale changes in regards
18 to that, or are we pretty much status quo as we are
19 now and exercise week is pretty much the same as opposed
20 to just one night of force-on-force, then the critique,
21 and then --

22 MR. JOHNSON: The overall goal for the
23 NRC-led force-on-force planning week is time reduction,
24 because we're only planning one exercise. And it goes
25 back to regardless of the outcome, the exercise is what

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1 the exercise is.

2 So, planning one exercise we see a
3 reduction in the time required rather than planning
4 two, briefing two, critiquing two, all of that portion.

5 It's now focused down to one mission plan,
6 run the mission, do the critique and the NRC departs
7 the site.

8 MR. CLORE: Thank you.

9 MS. BAILEY: Just a -- and I'm not sure
10 that this is the question, but I'm going to answer it
11 anyway.

12 In terms of the critique process with
13 Option 3 with the one exercise, we would still be
14 expecting the licensee to identify corrective action
15 through that critique process.

16 MR. NEWTON: So, going back to the
17 management critique piece, would you then expect to
18 see that at the conclusion of the licensee-observed
19 exercise as well, that formal critique? You have any
20 thoughts on that?

21 MR. JOHNSON: It has been discussed and
22 I think the current discussion is leading towards yes,
23 because long-range industry has really proposed going
24 to some sort of EP model. And this is just an extension
25 of that model. So, currently I think the thought

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1 process is a yes for that.

2 Again, implementing details is what we are
3 -- we're asking the Commission to approve this option
4 so that we go figure out all those details.

5 MR. NEWTON: And one comment, Clay, on that
6 is typically, when we do our internal annual exercises,
7 we don't do a follow-up management critique the next
8 day, but at a following plan-of-the-day meeting with
9 the senior leadership team, security will go in and
10 debrief, cover the, you know, what's in CAP results
11 of the exercise.

12 Maybe that's something the management
13 could observe and report back on as they're in there
14 now, you know. So, something to consider in lieu of
15 scheduling another day with the site.

16 MR. JOHNSON: Absolutely. There's lots
17 of potential.

18 MR. LYMAN: One more. So, for the NRC-run
19 force-on-force you have advisors or subject matter
20 experts who help to inform prep.

21 Would they be involved in the evaluation
22 of the licensee-run exercise at all?

23 MR. JOHNSON: Yes, sir.

24 MR. LYMAN: Okay.

25 MR. JOHNSON: Any other questions at the

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1 table?

2 MR. CLORE: I think I -- the last thing,
3 I was just going to thank you guys for the hard work
4 on all three options.

5 And I spoke to David offline that people
6 will go back and, you know, to the rest of the industry
7 and we can send a letter up from NEI addressing what
8 our preferred recommendation is in regards to the
9 options.

10 I guess the only question I have is
11 obviously I know sooner is better than later in regards
12 to the letter. I -- is there a drop-dead time frame
13 we need to hit by to get the letter up to you?

14 MR. JOHNSON: We're hoping to have our
15 paper in concurrence by the end of this month.

16 MR. CLORE: Okay.

17 MR. JOHNSON: So, quicker is probably
18 better.

19 MR. CLORE: Sounds good.

20 MR. JOHNSON: Do we have any questions on
21 the phone?

22 THE OPERATOR: On the phone line, if you'd
23 like your line open, just press star followed by one
24 and record your name clearly. Again, that is star,
25 one. One moment, please.

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1 We do have a question coming in. One
2 moment, please.

3 The question is from Dave Birkenpatch
4 (phonetic). His line is open.

5 MR. BIRKENPATCH: Yeah. Clay, I have a
6 question regarding Option 3 in the interest of
7 efficiencies.

8 Is there any possibility the NRC could
9 observe the licensee drill the night following the NRC
10 drill reducing the number of trips to the site?

11 Licensee could plan their own exercise in
12 parallel, I believe, with the NRC exercise.

13 MR. JOHNSON: Thank you for the question.

14 It has been discussed and we don't have
15 -- I don't have an answer for that, but it has been
16 part of the discussion on how we would implement Option
17 3.

18 MR. BIRKENPATCH (phonetic): Okay.

19 MS. BAILEY: I guess I would say we're open
20 to that. We're not against it.

21 THE OPERATOR: And at this time, I am
22 showing no further questions.

23 MR. JOHNSON: Thank you.

24 MS. BAILEY: I do have one question for
25 licensees and for NEI.

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1 One of the, I guess, arguments for Option
2 3 is that the licensee security programs have evolved
3 over the last four cycles. And so it's recognizing
4 the evolution of that program, the performances are
5 good.

6 And NEI has even alluded to that a couple
7 of times in your letter when you talk about reducing
8 the number of NRC-run exercises, that the program has
9 evolved and so it's time to change to perhaps reduce
10 the number of exercise -- NRC-run exercises.

11 So, help build that argument for me,
12 because all I really have in terms of that is a statement
13 in your letters, but really not a lot of details to
14 support that argument.

15 MR. CLORE: Thanks, Marissa. That's a
16 great question. And I can lean on Chris and Chris also
17 for support, but I think one of the reasons our push
18 in recent years was, you know, we are in our fifth cycle
19 force-on-force.

20 And looking back on performance,
21 performance has been very well in regards to effective
22 exercises and so forth in the past few cycles.

23 And I think as time has gone on, you know,
24 we have, you know, had push-backs from folks saying,
25 you know, maybe it's a time -- I think it was a couple

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1 years ago we went from originally two full exercises
2 and the third night beyond DBT.

3 And Step 1 of the program was, well, get
4 rid of the beyond-DBT night and just do two nights of
5 force-on-force, which, at the time, was great. I think
6 it worked out well for the industry and the NRC at the
7 time.

8 And I think as -- we've been doing it about
9 two years now, going on three years total, we looked
10 at another cycle coming up. Might be time to revise
11 again, because performance hasn't changed. It kept
12 excelling. It might be time to look at potentially
13 one night of force-on-force.

14 And with, you know, in regards to we have
15 the national CAF team and site adversary training
16 programs and so forth, our site's internal adversary
17 teams have been coming up to a more better standard
18 than where they were previously.

19 In regards to the licensee-led
20 observation, their exercises have become almost to the
21 level, if not at the level of the NRC-led exercises.

22 So, I think at a time the cycle's a go,
23 the industry may have not been there, but I think we
24 have developed and grown since then that our
25 licensee-led exercises are on par with the NRC-led

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1 exercises.

2 And in the name of efficiency for
3 inspectors and for the sites and so forth, we -- going
4 forward we think the one night of NRC-led force-on-force
5 and, you know, same with regard to Option 3, one night
6 of industry-led force-on-force may be a good program
7 to look into and achieve.

8 And I would solely, I guess, to answer your
9 question to get back is base that on performance. And
10 I think we, as an industry, have grown with our internal
11 teams, our internal scenarios. I think everything has
12 gotten better and evolved to a more efficient program.

13 MS. BAILEY: So, when you say that it's
14 "based on performance," are you looking at the data,
15 I guess, in terms of numbers of exercises that come
16 out as ineffective/effective? And are you looking out
17 across the industry?

18 Is that what you're basing that argument
19 on?

20 MR. CLORE: Yeah. We do that and we try
21 to trend all the areas. And primarily we looked at
22 where the ineffective exercises are.

23 And we do know that, you know, we can't
24 lie to say there has not been indeterminates and
25 marginals, you know, here and there.

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1 But I think looking -- we talk and share
2 information. Looking at the overall scope of it, the
3 number of ineffective exercises have been very, very
4 minimal.

5 I can't give you a number right now off
6 the top of my head, but in contrast to the marginals
7 and indeterminates.

8 And the reason we look at the marginals
9 and indeterminates is what caused that exactly in the
10 scenario.

11 And a lot of the findings we have found
12 from the industry side is that, you know, the cause
13 for the indeterminate or the marginal was not as heavy
14 as what an ineffective exercise carries.

15 And in looking at the grand scope, the
16 ineffectives are very, very minimal compared to the
17 effective exercises we've had over the course of the
18 cycles.

19 And I guess I can lean on Chris and Chris
20 if they have any supporting info on that.

21 MR. KELLEY: I can speak for a large fleet.

22 I've been with Exelon now going on ten years. We've
23 obviously ran a number of exercises.

24 And in that ten-year period, we had one
25 ineffective exercise and I really believe the root cause

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1 of that was based largely on two things.

2 One was we had removed a barrier that should
3 have been left in place. And, two, we had some
4 ineffective control of the exercise.

5 So, you know, we've done hundreds of these
6 exercises. We've had one ineffective exercise in the
7 ten years I've been there.

8 We've had a few indeterminate exercises
9 that range from start an exercise, a blinding snowstorm
10 occurs in the middle of it and we can't complete the
11 exercise for safety. It becomes indeterminate.

12 We've had some where we had a lot of
13 artificialities and simulations that our controllers
14 were not able to adequately portray to the players and
15 it just sort of got off the rails and we couldn't
16 complete it where you could evaluate the exercise, but
17 -- and I know Chris can speak to a large fleet, but
18 I think our performance has been exemplary. And I think
19 this is -- it's time to make these changes, yeah.

20 MR. NEWTON: Yeah. Just one thing to make
21 sure we're focused on apples and apples. So, this year
22 we've had, I think, 16 evaluated exercises. There's
23 been one failure.

24 And I know we hear the terms
25 "indeterminate," we hear "marginal." But at the end

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1 of the day, you know, those are not failures. So, I
2 just think we need to make sure we're talking apples
3 and apples here as far as that goes.

4 When you speak to the indeterminates and
5 the marginals, if you go back to Cycle 1 looking now
6 into this cycle, the complexity of these exercises has
7 grown exponentially. And what we require for the
8 controllers to be able to portray that security response
9 force leads to a lot of the indeterminate outcomes,
10 at least from my perspective and when I look at the
11 data across not just Duke, but also the industry.

12 We talk about the health of the program,
13 its base defense. Cycle 5, there's really only so many
14 ways to attack the plant. So, you start looking, okay,
15 now the mission has become really complex.

16 So, I think the core defense there -- say
17 on the core defense has always been improving since
18 we started this in Cycle 1.

19 In addition to that, we've also added the
20 05 inspection, too. So, now you've got the region
21 coming in, looking at the training program that backs
22 up all of this. That's the training for the security
23 response force members, the training for the internal
24 CAF team that runs the annual exercises for us, as well
25 as the controller training.

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1 So, I think that also helps demonstrate
2 the robustness of the program.

3 MR. LYMAN: All right. So, from the point
4 of view of the public, you look at the record and there's
5 been about one from the annual report. This number
6 hasn't changed for several years. This has been one
7 ineffective exercise roughly every year. So, that's
8 about a five-percent rate.

9 This year there is also listed a marginal
10 exercise. We do have the report of the lessons our
11 task force and other public statements about the quality
12 of the controllers and the problems with control of
13 the exercises with the licensees.

14 So, I wonder if the statement -- NEI
15 statement that the licensee-led exercises would be on
16 par with NRC-led is justifiable.

17 And the other aspect is how much of the
18 improved performance is due to the fact that you have
19 the inspection program in place and how do you know
20 that it's not going to deteriorate if you let up on
21 it? I mean, that could be the reason why it has
22 improved.

23 So, I don't think the argument that because
24 performance has improved that it's time to lighten up
25 on inspections makes sense. I think it speaks to why

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1 you need to maintain them.

2 MS. BAILEY: Okay. Thank you.

3 And actually your comment about the
4 improved performance being due to NRC inspection causes
5 me to ask another question.

6 And that's under Option 3, we would be
7 inspecting the licensee-conducted force-on-force
8 exercise, the annual force-on-force exercise.

9 So, what would the effect of NRC actually
10 inspecting that have on the quality of those
11 exercises?

12 MR. CLORE: This is A.J. from NEI.

13 I don't think there would be an impact.
14 I think where the licensee -- I think part of the
15 transition that Chris alluded to with the 05 and the
16 regions inspecting it, I think the regions have been
17 happy and satisfied with what they've seen from the
18 licensee-led that I think when NSIR goes to the site,
19 I think they'll see the same kind of vision.

20 I think they'll see that the sites -- excuse
21 me -- whether or not the exercises are challenging.
22 I think they'll see that the -- under Options 1 and
23 2, I think defense-in-depth, I think they'll see those
24 challenging as well.

25 I think they'll also see that sites'

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1 internal adversary teams are also very challenging up
2 to where the National CAF Team is at.

3 So, I don't think -- if anything, I think
4 having NSIR on site would actually, you know, help the
5 program even more because I think what the regions have
6 seen they've been satisfied and happy with.

7 And I think NSIR will be the same way
8 because I think they'll see what they expect to see
9 at the NRC-led force-on-force.

10 MR. KELLEY: Yeah. If I can just
11 piggyback -- this is Chris Kelley with Exelon -- I want
12 to talk a little bit based on what Chris Newton from
13 Duke said.

14 Our licensee-developed and run exercises
15 are really more based on core defense. And we're
16 running with qualified security officers who, in many
17 cases, have years of experience at the plant.

18 So, not only do they know the protective
19 strategy, they know the guy in Tower 4. I mean, they
20 know -- they know a lot more about the site than the
21 CAF team does. They've been there for years. They've
22 played both sides of the equation as far as exercises
23 go.

24 And I think the difference is when NSIR
25 comes in, what we see are a little bit more of

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1 simulations and artificialities than we do when we run
2 our own exercises, but our guys -- when I say "our guys,"
3 our internal CAF players typically penetrate further
4 into our defenses than is achieved by the NSIR teams
5 based on their in-depth knowledge of the strategy and
6 actual capabilities of the individual players that are
7 in place.

8 So, I would hesitate to say that they're
9 more challenging, but we tend to get more
10 defense-in-depth using our own players who know better
11 how to exploit our strategy than the NSIR team does.

12 So, I'm not saying our guys are more
13 challenging, I'm just saying that we tend to achieve,
14 you know, further into the strategy than typically we
15 get from the NSIR teams.

16 MR. NEWTON: Yeah. I can echo that.
17 We've done the same analysis at Duke and we have, in
18 fact, seen that the internal teams penetrate further
19 into the protective layers than does the national team.

20 You're ultimately running a team ultimate
21 insiders is what you're running against, or whatever
22 number you want to run, you know.

23 MS. BAILEY: Thank you.

24 THE OPERATOR: We do have a question on
25 the phone line, if you'd like to take it.

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1 MR. JOHNSON: Yes, please.

2 THE OPERATOR: Thank you. It comes from
3 Mike McNally. Your line is open. Go ahead with your
4 question.

5 MR. McNALLY: I actually have two
6 questions. The first one will stay on subject.

7 So, when you talk about in Option 3 bringing
8 in the -- bringing in the NSIR advisors, what role are
9 they particularly having in bringing them back?

10 Are they evaluating your site adversary
11 team or what role are they going to play? And then
12 I'll move on to the second one.

13 MR. JOHNSON: The advisors play a unique
14 role in providing technical expertise to the inspection
15 team.

16 But in the case of evaluating a licensee's
17 program, one of the considerations that we have to keep
18 in mind, the CAF team was developed at the Commission
19 direction because there were situations in Cycle 1
20 effectively where there was inconsistency in
21 performance of licensee adversaries.

22 So, we need to have somebody that has the
23 physical capability and the mission to participate with
24 the licensee adversary as an evaluator.

25 MR. McNALLY: So, if the determination is

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1 made that they're not living up to the CAF standard,
2 what's going to happen in that -- I mean, obviously
3 there's a lot of criterions that go on at the sites
4 with the site adversary teams as far as the monitoring
5 of time and such.

6 So, these CAF advisors are used to seeing
7 a certain standard out there running around with CAF
8 and they're probably not going to necessarily see that
9 standard even though, going back to what Chris said,
10 the knowledge is there from the site adversaries.

11 But from performance-wise, because they
12 know the training that they have and that's their sole
13 duty, I just would have a concern about what the
14 adversary advisor is evaluating as far as my site
15 adversaries, because they're probably not going to see
16 the level of efficiency that they're going to see from
17 the CAF just because of the training aspect. And these
18 guys are actually security officers 99 percent of the
19 time.

20 MR. JOHNSON: Completely understood.

21 What you are pointing to is probably a
22 driver that will require us under performance
23 assessment to come up with metrics, to have a
24 standardized evaluation of adversaries. And that
25 would apply to the national CAF team and licensees'

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1 adversaries.

2 There's already been work -- I'll call it
3 groundwork done preliminary -- and I believe it went
4 out for public comment some time ago, Regulatory Guide
5 575, the potential rewrite. There was an extensive
6 section added to it on adversaries.

7 So, you're pointing out the fact that this
8 is one area in the development should we go with Option
9 3, that we may have to put together some very clear
10 metrics that would be standardized across industry and
11 the national CAF team.

12 MR. MCNALLY: Okay. Thanks.

13 The second one is going back to the SEMA
14 part of the conversation -- early part of the
15 conversation, is there talk about revising 5.81
16 particularly having to do with the six operator actions
17 and what needs to be done for sites to take credit?

18 If we're implementing the potential of the
19 SEMA and LOE response and such and the coping time
20 issues, they seem to conflict with what 5.81 says in
21 the six operator -- credit operator actions.

22 So, is there a look at revising those six
23 credit operator actions or removing those completely
24 if we're going to take -- be able to take credit for
25 the SEMA mitigation?

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1 MR. ANDERSEN: This is Jim Andersen.

2 They won't be removed completely. There
3 will be some assessment in the future, if we go down
4 the path, of providing another alternative to -- I think
5 it's Criterion 3 that's causing most of the problems
6 for the licensees to deal with operator actions, but
7 so SEMA might allow an alternate method to achieve
8 Criterion 3.

9 So, in that respect, the reg guide would
10 probably be updated to include that alternative method
11 in the future.

12 Actually, Reg Guide 5.81 is in the process
13 of going out for public comment. So, this is actually
14 a very good opportunity.

15 If we proceed with discussions on SEMA and
16 proceed with the revisions of the reg guide, it might
17 time out fairly well. But then again, you never know.
18 Hopefully I answered your question.

19 MR. MCNALLY: Yeah. Thanks, Jim.
20 Appreciate it. That's all I have. Thank you.

21 THE OPERATOR: Thanks. At this time, I'm
22 showing no further questions on the phone line.

23 MR. PRETZELLO: Yeah, I had a question.
24 Marissa touched on this a little bit.

25 The Commission asked us to look at areas

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1 that yield improvement and efficiencies. And a lot
2 of the discussion we've been having we're talking about
3 areas of improvement.

4 Could you just go into each of the options
5 and talk about where you see efficiencies?

6 MR. CLORE: Yeah. Thanks, Drew.

7 So, looking at the three options, looking
8 at Option 1, as Clay had mentioned earlier, the kind
9 of status quo, what we currently do now, I think one
10 of the areas is elimination of IP redundancies, you
11 know.

12 We discussed this and part of the reason
13 why we revised NEI 05-05, part of the reason with NEI
14 03-11, you know, a lot of our documents is because we
15 had a lot of documents overlapping.

16 And I believe the last was a guidance
17 document or a white paper, I think, that was in regards
18 to force-on-force that was -- kind of narrowed down
19 what we do in the 03 as an inspection procedure and
20 what's done in the 05. And there was a heavy overlap
21 of a lot of things. So, I think that's one thing.

22 Another part -- piece of that would be the
23 inspection hours, as Clay alluded to, you know. I think
24 that the sites have become so streamlined that, you
25 know, it may be beneficial to not have the inspectors

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1 on site as much during the planning week stages.

2 As, you know, the sites have grown, you
3 know, over the cycles that I think that for Option 1
4 specifically, I think that would be the biggest
5 efficiency for us.

6 And, like, if you guys want to jump in,
7 feel free to. Option 2, I think Option 2, the biggest
8 thing there would be, you know, if the first night would
9 be effective, the second night is a defense-in-depth
10 exercise, which a lot of the utilities already do.

11 So, what that does is, you know, we are
12 currently doing something we already do. So, I think
13 having, you know, not having to, as Clay mentioned,
14 you know, potentially plan a full-scale exercise, we're
15 just going to let them go and start right in the middle
16 of it and things of that nature.

17 And then Option 3, you know, I think Option
18 3 would be the most efficient, you know, speaking from
19 NEI and the industry. And if these guys disagree, they
20 can jump in.

21 But I think when you look at -- the biggest
22 thing there is not having a second night of NRC-led
23 force-on-force. And what you're doing is not even
24 currently having to schedule a second night.

25 The second night could be whenever the site

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1 does their annual force-on-force. So, we're already,
2 you know, doing our -- required to do our annual
3 exercises that, you know, if NSIR and when you do the
4 schedule look at, okay, so, here's Site A, we do the
5 force-on-force on March and you have an annual exercise
6 scheduled in August. We'll come back on that date and
7 finish up our NSIR inspection in August and be done.

8 I think that's the most efficient because
9 it's taking, you know, taking a whole day away. It's,
10 you know, officers on overtime, officers, you know,
11 being on site for a second day.

12 And I think it's the prep work up until
13 that point, because it comes from my days on site when
14 you have to have the other crews fill in for the crews
15 you have to pull off shift to train and do your limited
16 scopes for that, you're really having all four crews
17 participate almost in a way into an evaluated exercise.

18 So, it's a lot on the site and I think that
19 would be the most beneficial efficiency-wise -- the
20 biggest efficiency, I think, across all three options.

21 But I think coming to the table, I think
22 all three do provide efficiencies. And we had talked
23 about that, you know, a while back with a lot of the
24 industry that all three options from an industry
25 standpoint do provide efficiencies for us, which I think

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1 is a big step forward in regards to where we're at in
2 2017 going to 2018 and into the other cycles.

3 MR. YOUNG: I think our position being --
4 is clearly Option 3 provides the most efficiencies,
5 right, because there's -- you're only doing one
6 exercise during this planning week.

7 With Option 2, I'm not sure how much
8 additional efficiency you're really gaining here,
9 because you're going to have to do the planning for
10 the second exercise and then also have the planning
11 for the DID demonstration as well. So, if anything,
12 it may be a little extra work for Option 2.

13 But, you know, with Option 3, that's
14 clearly -- that's clearly where the biggest savings
15 are.

16 MR. NEWTON: Yeah. One other efficiency
17 we thought about yesterday that would apply to any of
18 the three options, if you look at the conduct of
19 tabletops, we've seen a tabletop go upwards of two hours
20 and they're very formal in nature.

21 You've got your alarm station operators
22 there, your RTL and your Triple S, Ops EP if they want
23 to participate as well.

24 It appears to us, you know, the primary
25 folks that has mission planning, where are the

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1 responders going to be, what are your actions going
2 to be?

3 Maybe we could do that more informally,
4 bring in an RTL and/or Triple S and just have the
5 advisors and your team leads just kind of purvey if
6 we did this, what would your response be? If we did
7 that, what would your response be?

8 I think there's some opportunities there
9 maybe to cut that time back by 50 percent easily. So,
10 that's something to consider.

11 MR. YOUNG: Did that answer your question
12 or did you get the answer you were looking for?

13 MR. PRETZELLO: Yes, that did answer my
14 question.

15 MR. YOUNG: Thank you. All right.

16 MS. BAILEY: Can I turn the question around
17 for both industry and the public, if you're willing
18 to answer it, so for the three options, what are your
19 concerns with each of the options? Well, what's the
20 unintended consequence?

21 MR. CLORE: I'll jump in. I guess I'll
22 start off.

23 I think for Option 1, I guess -- and my
24 opinion would be that it's status quo. And not that
25 that's a bad thing. I just think that we've -- a few

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1 years ago, as I mentioned, we went down to two exercises.

2 And I think we're at an important time that I think
3 we could potentially look at gaining efficiencies
4 elsewhere. So, I think that's the only negative I have
5 with Option 1.

6 Option 2, as David alluded to, would be
7 defense-in-depth, you know, although confident I can
8 say all the sites do defense-in-depth exercises, I don't
9 see the efficiencies gained there. I think that's a
10 lot of planning. That's a lot of keeping the folks
11 on site.

12 And, you know, comparing Option 2 to Option
13 1, I think Option 1 may be, you know, a little preferable
14 to Option 2.

15 Option 3, I think the biggest challenge
16 we had with that would be to scope out parameters on
17 exactly what the second night looks like when the NSIR
18 team comes back to site in regards to the inspection
19 team and the continuity.

20 I know you guys have crazy schedules as
21 well. But, you know, I think if Team Lead A was at
22 the site for Exercise 1, that if Team Lead A can make
23 it to the second time, obviously that's going to depend
24 on a lot of scheduling, a lot of logistics with the
25 site and NRC.

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1 But I think there's a lot around the
2 licensee-led exercise that would be -- probably until
3 it gets further developed, it will be a lot of our
4 questions.

5 And that's why a lot of the questions today,
6 if you notice, came within that area, because that's
7 one of the areas that's kind of new to us, you know.

8 It's a different part of the option that we think that,
9 like, we mentioned that the most efficiency can be
10 gained.

11 So, we're curious and interested to see
12 what that second licensee-led NRC-inspected exercise
13 would look like.

14 MR. YOUNG: Yeah. To me, I mean, the only
15 unintended consequence I could think of on Option 3
16 would be just, you know, depending on when you had to
17 do that second exercise.

18 And I think, as Clay said, as long as
19 there's some flexibility in the scheduling, this will
20 be to address, again, things like, you know, potential
21 weather impacts or some other things that can crop up
22 at power plant sites.

23 As long as there's flexibility in when you
24 schedule that second exercise, I think that can go
25 a long way to, you know, addressing any unintended

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1 consequences.

2 MS. BAILEY: Any other comments or any
3 other feedback on that on the consequences?

4 MR. NEWTON: One other concern on Option
5 2A off of this list is to starting anything
6 defense-in-depth. Because obviously you have the full
7 with the fight, and now we're going to start responders
8 in the middle of that fight.

9 And the ability for those controllers to
10 paint the picture of exactly what they have, where they
11 would be at that point in their protective strategy,
12 that would cause us some concern.

13 It would be quite a high degree of logistics
14 to make sure they're set up for success with that option,
15 I believe.

16 MS. BAILEY: Thank you.

17 MR. KEENE: Does anybody else here have
18 any questions?

19 Okay. Shirley, do you want to open up the
20 phone line for questions one last time?

21 THE OPERATOR: Certainly. Again, if
22 you'd like to ask a question, just press star followed
23 by one and record your name clearly. One moment,
24 please.

25 We do have a question from Mike McNally.

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1 Your line is open. Go ahead with your
2 question.

3 MR. MCNALLY: Yeah. This has to do with
4 Option 2 and the consideration it may be taken, because
5 obviously every site out there has a different type
6 of protective strategy as far as where they want to
7 neutralize or know where they're going to have the most
8 opportune time to neutralize adversaries.

9 And while the option on the second night
10 may be to -- depending on the type of strategy that
11 you have, I haven't heard any talk about reducing
12 numbers of adversaries to compensate for that.

13 Because if the protective strategy is to
14 neutralize that defense prior to the power block, then
15 the majority of my firepower is going to be concentrated
16 there.

17 So, to stand up the DBT site adversary force
18 to hit the power block, I may not be set up to handle
19 that. In particular, when I'm relying on those
20 adversaries to be neutralized outside.

21 So, is there any consideration to reduce
22 those numbers and a defense-in-depth compensate for
23 that?

24 MR. JOHNSON: Thank you for the question.

25 The current thought process -- again, this

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1 is all in the implementation. The current thought
2 process is we would be challenging command and control,
3 interdiction, situational awareness, things along
4 these lines. Defense of the target set would not be
5 the regulatory issue.

6 So, would we use the full adversary force?

7 Maybe, maybe not. That goes to -- in the mission
8 planning, we have to determine what it is we're trying
9 to evaluate and then we bring the tool -- the appropriate
10 tools to do that evaluation. So, it may or may not
11 involve all the DBT attributes.

12 MR. MCNALLY: Okay. I understand.
13 Thanks.

14 THE OPERATOR: Thank you. At this time,
15 I'm showing no further questions on the phone line.

16 MR. KEENE: Thank you, Shirley. So, with
17 that, I would suggest that we adjourn the public
18 meeting.

19 Darrell, did you have anything to close
20 out with?

21 MR. ROBERTS: Yeah. I just wanted to
22 thank all of you for your participation in this part
23 of the meeting, and the folks on the phone as well.
24 I appreciate the dialog and the comments.

25 This is obviously an important juncture,

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1 I would offer, in terms of the force-on-force program
2 and where it could potentially be heading, number of
3 options we are considering.

4 And your input and feedback is obviously
5 very important to that to what we're considering. So,
6 appreciate that.

7 And with that, I'll just close this part
8 of the meeting and turn it over --

9 MR. KEENE: Okay. We'll adjourn the
10 public. We'll close off the phone line and we'll take
11 a 10-minute break -- actually, let's come back at 9:30
12 and then we'll set up for the next one. Thank you very
13 much.

14 Shirley, we can go ahead and sign off,
15 please.

16 THE OPERATOR: Thank you. That does
17 conclude today's conference. We thank you for your
18 participation. And on the phone lines, you may
19 disconnect your lines.

20 (Whereupon, the above-entitled matter went
21 off the record at 9:17 a.m.)

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