

**RESPONSE TO SRM-17-0100 – ADDITIONAL STAKEHOLDER INPUT
DECEMBER 17, 2018
10:00AM – 4:00PM
NRC COMMISSIONERS' HEARING ROOM**

QUESTIONS

**SLIDING SCALE – CREDIT FOR OPERATOR ACTIONS, FLEX EQUIPMENT, AND LAW
ENFORCEMENT ASSISTANCE**

1. What are the perceived advantages for industry to implement the sliding scale option?
Disadvantages?
 - a. Provide a timeframe for implementation by the industry.
2. What specific credit is industry seeking if the Commission were to select the sliding scale option?
3. How does industry view the six elements of the sliding scale option in helping to decrease the security coping time?
 - a. Should one element be weighed more? If yes, which one any why?
4. As it relates to the Training and Validation element of the sliding scale, provide the frequency in which licensees should conduct practice drills with their respective law enforcement agencies.

QUESTIONS

NUCLEAR ENERGY INSTITUTE (NEI) SECURITY BOUNDING TIME (SBT) WHITE PAPER – CREDIT FOR OPERATOR ACTIONS, FLEX EQUIPMENT, AND LAW ENFORCEMENT ASSISTANCE

1. What are the perceived advantages for industry to implement NEI's SBT white paper? Disadvantages?
 - a. Provide a timeframe for implementation by the industry.
2. What specific credit is industry seeking if the Commission were to select NEI's SBT option for implementation?
3. Are there minimum capability standards the law enforcement support would have to meet before SBT credit is applied?
4. Indicate whether the Protected Area (PA) formula in the SBT White Paper would enable licensees to credit law enforcement support just in exterior areas inside a PA, or also within structures like the power block.
5. Explain the basis for the law enforcement mission planning and execution times in the Owner Controlled Area (OCA) and PA formulas.
6. NEI's SBT white paper contains a six step process. These steps are similar to the NRC's sliding scale option. What does industry view as the biggest difference between the SBT option and sliding scale option?
 - a. Does one option provide for more credit than the other?
7. Would licensees be expected to provide law enforcement organizations with site information prior to an attack, or only be prepared to make it available during an attack?
8. Explain how the fixed times for law enforcement mission planning and execution in the SBT White Paper formulas maintain the relationship between actual law enforcement capabilities and SBT credit.

QUESTIONS

TARGET SETS – CREDIT FOR OPERATOR ACTIONS, FLEX EQUIPMENT, AND LAW ENFORCEMENT ASSISTANCE

1. If industry is seeking credit for operator actions and the use of plant equipment (including FLEX) as it pertains to target sets, provide input to the following:
 - a. Will the potentially small number of operator actions that can be added to target sets, be worth the effort it will take to accomplish this from industry's perspective?
 - a. Has the industry determined the number or percentage of target sets that would be impacted based on establishing a security bounding time (SBT)?
 - b. To utilize a SBT, what methodology does the industry see as effective for identifying time to core damage that can be applied consistently? Will industry propose a standard methodology?
 - c. Should SBT be site-specific or a standard number across the industry? What are the advantages and disadvantages of a site-specific SBT versus a standard SBT across the industry?
2. If offsite equipment, such as FLEX equipment, is considered in a target set element, provide input to the following:
 - a. Is it industry's intent to include locations (i.e., bridges, ingress/egress routes, etc.) as methods to prevent an action from being accomplished if the action relies on offsite support? Will these elements be assumed lost, similar to offsite power sources?
 - b. Is it industry's intent to include offsite facilities (all offsite locations) as methods to prevent an action from being accomplished if the action relies on offsite support? Will these elements be assumed lost, similar to offsite power sources?
3. If target set elements include operator actions that can be seen from outside of the Protected Area (PA), provide input to the following:
 - a. Is it industry's intent to include locations (i.e., bridges, ingress/egress routes, etc.) as viable locations to prevent an action from being accomplished if successful performance of the operator action relies on onsite security personnel?
 - i. Recalled security personnel?
 - ii. Law enforcement organization support?
4. If industry is seeking credit for law enforcement assistance as it relates to operator actions and the use of plant equipment (including FLEX), provide input to the following:
 - a. Is the Owner Controlled Area (OCA) and Protected Area (PA) the only areas of the plant that industry would like to take credit for?
 - b. Are there other areas of the plant that industry would like to take credit for?
 - c. What type of training would industry provide to law enforcement organizations to receive the maximum amount of credit?
 - d. What would be the training frequency industry would provide to law enforcement organizations to receive the maximum amount of credit?
 - e. Does industry see a benefit to law enforcement organizations playing with them in FOF exercises?

QUESTIONS

SIGNIFICANCE DETERMINATION PROCESS (SDP) – CREDIT FOR OPERATOR ACTIONS, FLEX EQUIPMENT, AND LAW ENFORCEMENT ASSISTANCE

1. Does providing credit in the significance determination process for actions that can be taken after a loss of target set (mitigation strategies such as FLEX and/or additional actions by law enforcement organizations), provide sufficient consideration of these actions (extraordinary operator actions (SAMGs), LLEA, and/or offsite equipment) or is it the intent of the industry to now characterize exercise outcomes as effective and not enter SDP space?
2. If industry is seeking credit in the significance determination process (SDP) for actions that can be taken after loss of a target set element, provide input to the following:
 - a. Does credit in the SDP provide sufficient consideration of the actions to be taken after loss of a target set element (i.e., extraordinary actions by operators for severe accident mitigation guidelines (SAMGs); the use of offsite equipment (such as FLEX); or law enforcement organization assistance)?
 - i. If yes, what does industry see as sufficient consideration?
 - ii. If no, what information (or additional information) does industry need to consider?
 - b. Is it the intent of the industry to now characterize exercise outcomes as effective and no longer enter the SDP?

QUESTIONS

REGULATORY GUIDE (RG) 5.81, CRITERION 3, PRECLUDING ADVISORY INTERFERENCE

1. What does industry see as the advantages and disadvantages in regards to modifying RG 5.81, Criterion 3, Precluding Advisory Interference, in the following ways:
 - a. Allowing operators an extended time to move based on increased adversary timelines (i.e., a specified time added for each defensive fighting position an adversary would encounter)?
 - i. What amount of time is reasonable for an adversary to circumvent an interior defensive fighting position (i.e., would include primary defensive fighting position, not a redirected defensive fighting position)?
 - b. Precluding adversary interference by security force members aiding operator movement?
 - i. Would this involve a dedicated security force member? If yes, provide the dedicated number (i.e., 1, 2, etc.).
 - c. Precluding adversary interference by onsite security personnel aiding operator actions and/or movement?
 - d. Precluding adversary interference by recalled security personnel to protect onsite/offsite equipment to prevent core damage?
 - e. Precluding adversary interference by law enforcement organizations aiding operator actions or protecting onsite/offsite equipment to prevent core damage?
2. As it relates to RG 5.81, are there additional options to modify what is acceptable and unacceptable to meet Criterion 3?
3. If RG 5.81, Criterion 3 reverts to what it was before its last revision, would this change industry's support and request for law enforcement credit?