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January 18, 2019

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

Subject: Use of Licensee Multiple Integrated Laser Engagement System (MILES) Equipment in Force-on-Force Exercises

Project Number: 689

Dear Ms. Bailey:

In a letter dated August 8, 2018, the Nuclear Energy Institute (NEI),¹ on behalf of its members, provided suggested improvements to the Force-on-Force (FOF) exercise inspection process. In that letter, we requested the U.S. Nuclear Regulatory Commission (NRC) consider allowing licensees to use their own MILES equipment in NRC-evaluated FOF exercises. Subsequently, in the Staff Requirements Memorandum to SECY-17-0100,² the Commission directed the staff to assess whether there exist any obstacles to the NRC's acceptance of the use of licensee MILES equipment in both an NRC-conducted and a licensee-conducted FOF exercise, and if none, adopt this practice.

We appreciate the agency's consideration of this proposal. NEI has continued to engage with its members to assess the feasibility and timing of a transition to the use of licensee MILES equipment. SRM-SECY-17-0100 directs the staff to pursue several other actions that are of significant interest to our members, and they have indicated their belief that pursuing NRC approval for use of licensee MILES equipment at this time would be an unnecessary distraction. Accordingly, NEI would like to defer further work related to obtaining NRC approval for use of licensee MILES equipment until a future time.

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

² Refer to ADAMS Accession Number ML18283A072.

Ms. Marissa Bailey
January 18, 2019
Page 2

If you have any questions or require additional information, please contact me at (202) 739-8123 or wrg@nei.org.

Sincerely,

A handwritten signature in black ink that reads "William R. Gross". The signature is written in a cursive style with a large, stylized initial "W".

William R. Gross

c: Mr. Brian Holian, NSIR, NRC
NRC Document Control Desk