



NUCLEAR ENERGY INSTITUTE

Douglas J. Walters
SENIOR DIRECTOR, SECURITY
NUCLEAR GENERATION DIVISION

June 29, 2006

Mr. Daniel H. Dorman
Deputy Director
Division of Nuclear Security
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

PROJECT NUMBER: 689

SUBJECT: Transmittal of NEI 05-05, *Controller Responsibilities Guidelines*

Dear Mr. Dorman:

This letter formally submits Revision 1 of NEI 05-05, *Controller Responsibilities Guideline* for NRC evaluation and endorsement. This revision of NEI 05-05 disposes the following:

- Comments received in a letter from Mr. Glenn Tracy dated November 4, 2005.
- Comments provided by the NRC staff in a January 20, 2006 meeting. The following is an excerpt from an NRC e-mail dated January 25, 2006, which summarized the results of that meeting:

"NRC staff reiterated to NEI two comments from the 11/4/05 memo from G. Tracy to D. Walters that were not incorporated in the latest draft of NEI 05- 05. NEI agreed to incorporate the comments.

NEI agreed to review the potential for a more formalized qualification program for two major positions: the lead and adversary controllers. A qualification program indicates an individual's demonstrated knowledge, particular to the responsibilities of his/her position, and documented experience in performing the duties of the position, either under supervision or in previous exercises."

- Potential exceptions to the guidance documented by the NRC following an initial review of Revision 1 draft. These comments were provided to NEI via e-mail in May 2006.

Mr. Daniel H. Dorman

June 29, 2006

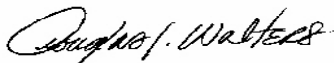
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A consistent theme in the NRC's comments is qualification of the Lead Adversary Controller and the Lead Controller. The enclosed revision includes a modified Chapter 7 to address this issue.

Regarding the potential exceptions to NEI 05-05, we recognize that our proposed resolution to the exceptions may not provide specific numerical controller guidance for every engagement situation encountered during a Force-On-Force (FOF) exercise; however, we feel that the document provides sufficient guidance to controllers to ensure fair and consistent rules of engagement.

We appreciate the NRC's input to this document. We also feel that the NRC's comments have been appropriately addressed and that this revision will achieve the mutual goal of improving FOF controller training and performance. Based on the level of previous reviews this document has received, we do not anticipate significant additional comments or concerns. However, if the NRC does take exception to the document, we request that a basis for the exception be documented in a response to this letter. Please contact Mr. Daniel McMillan at NEI (202) 739-8174; dxm@nei.org if questions arise.

Sincerely,



Douglas J. Walters

Enclosure

c: Mr. Richard P. Correia, NRC
Mr. Ronald J. Albert, NRC
Document Control Desk