

August 19, 2011

Mr. David R. Kline
Director, Security
Nuclear Generating Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION FEEDBACK ON NUCLEAR ENERGY INSTITUTE'S CONCEPT PAPER TITLED "PROPOSED APPROACH TO EVALUATING SECURITY PERSONNEL RESPONSE TO ADVERSARY USE OF HOSTAGES," DATED MAY 31, 2011

Dear Mr. Kline:

The purpose of this letter is to provide you feedback on your concept paper titled "Proposed Approach to Evaluating Security Personnel Response to Adversary Use of Hostages," dated May 31, 2011. The staff has completed its review of the subject paper and concludes that the proposed approach has several potential weaknesses:

- (1) The paper uses the term "Tabletop Exercises." This is a misnomer. The correct title should be "Table-top Drills." The drill term comports with long-standing understanding of the difference between an exercise and drill. In addition, the term "Tabletop Simulations" is later introduced. The paper lacks clarity on the difference, if any, between "Tabletop Exercise" and "Tabletop Simulations."
- (2) It is not clear how the Systematic Approach to Training methodology detailed in Regulatory Guide 5.75, "Training and Qualification of Security Personnel at Nuclear Power Plants," was used to support the use of table-top drills and discussions to evaluate this tactic.
- (3) Table-top drills and discussions may not satisfy the physical security plan requirement that an adequate response strategy be demonstrated, especially regarding the actions of the following personnel: armed security officers, armed responders, search train personnel, and Independent Spent Fuel Storage Installation personnel, etc.
- (4) It is unclear how this alternative approach would be implemented industry-wide (e.g., Title 10 of the *Code of Federal Regulations* 50.54(p) and/or a Nuclear Energy Institute 03-12 template change).
- (5) The paper does not give any details as to how the drill will be conducted, especially concerning how the disciplines such as operations, security, emergency planning, etc., would be involved.

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In light of these weaknesses, the staff also concludes that performance-based limited-scope exercises rather than table-top drills and discussions should be used to assess the hostage tactic.

The staff welcomes the opportunity to continue to work with the nuclear industry to finalize an acceptable approach to assess the hostage tactic.

Sincerely,

/RA R. Johnson for/

Patricia K. Holahan, Director
Division of Security Operations
Office of Nuclear Security and Incident Response

Enclosure:
U.S. Nuclear Regulatory Commission
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