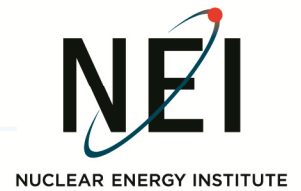


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April 25, 2016

Mr. Michael C. Layton
Director, Division of Security Operations
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Survey of Multiple-Integrated Laser Engagement System (MILES) Equipment

Project Number: 689

Dear Mr. Layton:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to continue working with the staff to further inform and improve the Security policy and process. Both the Nuclear Regulatory Commission (NRC) and the industry have been exploring ways to more efficiently utilize available resources. One of the areas of efficiency jointly identified is the use of licensee owned MILES equipment for the triennial Force-on-Force (FOF) exercises as opposed to using NRC owned MILES equipment.

When MILES was initially incorporated into the FOF evaluation process in 2004, few licensees owned or had ready access to MILES equipment. In order to consistently and safely integrate MILES equipped drill weapons into the FOF inspection process, the NRC contracted with the Department of Energy's (DOE's) National Nuclear Security Administration (NNSA) to provide training weapons, MILES equipment, and technical staff for the maintenance of the equipment and training licensees on the use of the equipment.

NEI has conducted a survey of the industry regarding the availability and capability of MILES and supporting equipment. This survey included 62 licensees representing all utilities with active

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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commercial nuclear power reactors. The survey asked nine primary questions with additional clarifying question for certain responses.

The results of this survey indicate the following:

- All 62 licensees reported owning their own MILES equipment; of those, 59 own SAAB equipment and 3 own Cubic.
- Two-thirds (42 licensees) reported having separate MILES equipment for mock adversaries; the remainder share consolidated equipment with responders.
- One-half (32 licensees) reported the ability to reprogram their mock adversaries' MILES equipment to mirror the capabilities of a wide range of weapons platforms; it is believed the remainder of the licensees have the capability but do not exercise it.
- 60 licensees, all but two, reported the ability to download engagement and other data from the users' equipment.
- Just over half (36 licensees) reported owning MITS kits (MILES harnesses for vehicles).
- A small number, 10% of licensees, reported owning other MILES devices such as MILES grenades.
- Over 80% (51 licensees) reported doing their own minor maintenance; however, most reported major maintenance and calibration is provided by the vendor.
- All 62 licensees reported owning separate weapons for drill and exercise purposes.
- All licensees reported some types of safety modifications that prevent the chambering and firing of live ammunition.

Based on the survey results and the fact that licensees are already using their own MILES to demonstrate their protective capabilities during inspections conducted by the Regions under Inspection Procedure (IP) 71130.05, "Protective Strategy Evaluation and Performance Evaluation Program," the industry believes that it is the appropriate time to begin allowing licensees to use their own drill equipment, including MILES, during the triennial FOF inspection conducted under IP 71130.03. This change imposes no additional burden on licensees and additionally allows for more a judicious use of NRC resources.

If you have any questions or require additional information, please contact Richard Speer at (202) 739-8121; rjs@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Speer".

Richard J. Speer