

April 14, 2021

Ms. Shana R. Helton  
Director, Division of Physical and Cyber Security Policy  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Regulatory Guide 5.75, *Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities*, Revision 1

**Project Number: 689**

Dear Ms. Helton:

The Nuclear Energy Institute (NEI)<sup>1</sup> and its members have reviewed the recently released Revision 1 to Regulatory Guide (RG) 5.75, "Training and Qualification of Security Personnel at Nuclear Power Reactor Facilities." The following comments are being provided to the U.S. Nuclear Regulatory Commission (NRC) staff for consideration during the next revision effort.

1. Section 5.3.4 of RG 5.75 states that, "when planning drills and exercises, personnel should be identified to fill each of the roles and response team duty positions and duty functions required to support the selected scenario and the type of drill or exercise being conducted." Given this statement, it is unclear what type of activity would satisfy the annual participation requirement for an individual filling a response position deemed as "not required" in an annual exercise. For example, would a "not required" individual's participation in a tabletop exercise suffice to meet the annual participation requirement? The NRC should consider clarifying the intent of the guidance.
2. Section 5.6.2 of RG 5.75 conflicts with the guidance in section 5.5.3 of RG 5.81, Revision 1, with respect to adversary interference. The NRC should consider correcting section 5.6.2, and other sections that reference or discuss RG 5.81, to align with the guidance in Revision 1 of RG 5.81.

NEI requests a public meeting to discuss the comments above and to provide a forum for the staff to answer stakeholder questions regarding Revision 1 of RG 5.75.

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<sup>1</sup> 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.


Ms. Shana R. Helton

April 14, 2021

Page 2

If you have questions or require additional information, please contact AJ Clore at (202) 285-2085 or [ajc@nei.org](mailto:ajc@nei.org), or me.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Gross". The signature is written in a cursive, flowing style.

William R. Gross

Cc:

Ms. Sabrina Attack, NSIR/DSO, NRC

Mr. Todd Keene, NSIR/DSO, NRC