

# NEI White Paper, “Development of Adversary Timelines” NRC Comment Resolution

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# Purpose

This white paper provides guidance for determining performance-based adversary timelines.

The following slides will address how the NRC's comments on this white paper were resolved.

# NRC Comment – Overall

- Numerous comments pertaining to the generic travel speed table that was proposed during the July 2021 public meeting.
  - Given the feedback provided by both NRC and industry, the guidance in the white paper was revised and is solely focused on performance basing adversary timelines, rather than a standard travel speed.
  - This change would allow sites to factor: terrain, cover/concealment, dead space, engagement opportunities, multiple responders/adversaries and various other elements.

# NRC Comment

- Comment – “Adversary Timelines developed to meet the physical security design requirements are only considered appropriate when starting from a regulatorily required intrusion detection system. NEI’s statement of “some detection point” should be clarified to “the committed intrusion detection system as identified in the NRC-approved site security plan.”
- Resolution – Agree, addition of recommended language can be found on page 3 of NEI white paper.

# NRC Comment

- Comment – “Both active and passive barriers should be included/considered.”
- Resolution – Agree, described in section 4 on page 4 of white paper.

# NRC Comment

- Comment – “Consideration that the adversary is well trained and willing to kill or be killed, per 10 CFR 73.1.”
- Resolution – Agree, 73.1 reference was absent in initial paper. Description added within “Background” section on page 2, as well as “Reference” section on page 5.

# NRC Comment

- Comment – “Outer edge of a building should be expanded to include a location where adversary operations can be conducted from which a target element may be destroyed or rendered incapable of performing its intended safety function or action.”
- Resolution – Agree, recommendation included on page 3, under “Adversary Pathway Selection.”

# NRC Comment

- Comment – “It would seem appropriate to use the breaching option most advantageous to the adversary. As written, the white paper appears to give sites options to potentially use a breaching methodology that could represent the slowest for an adversary.”
- Resolution – Agree, added section 4 on page 4 to account for variables associated with breaching and using the most advantageous technique for the adversary.



# NRC Comment

- Comment – “The methodology does not address changes to plant configurations associated with outages and other evolutions that change plant layout and target sets (mode changes).”
- Resolution – Agree, addition of section, “Plant Configurations” can be found on page 5 of white paper.

# Path Forward

- April 21<sup>st</sup>, 2022 – NEI will be hosting a joint implementation workshop to roll out:
  - White paper on Developing Adversary Timelines
  - Reasonable Assurance of Protection Time (RAPT)
- Part of the focus of this workshop will be potential changes to sites security plans. To include:
  - Appropriate guidance to follow
  - Validation exercises to support a change
  - Documentation of exercises (technical basis)
  - Maintaining all documentation for inspection

# Points of Contact

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# Questions

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