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Docket No. 50-461

10CFR50.54(p)

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: 10CFR50.54(p) Change to the Clinton
Power Station Physical Security Plan

Dear Sir or Madam:

Attached is the signed original and three copies of revision twenty-nine (29) of the Clinton Power Station (CPS) Physical Security Plan (PSP). This revision is being submitted in accordance with 10CFR50.54(p). Changes made in this revision are indicated with a revision bar in the right margin of the affected pages. This revision of the PSP does not reduce the effectiveness of the physical security at CPS.

Attachment 2 to this letter details subjects that are Safeguards Information and are exempt from public disclosure in accordance with 10CFR73.21(c)(2). These changes to the CPS PSP have been discussed with J.L. Belanger of the NRC Region III, Division of Reactor Safety staff.

Sincerely yours,



Michael A. Reandeau
Director-Licensing

JRF/blf

Attachment: (1) Summary of Changes
(2) Five Copies of Revision 29 Affected Pages

cc: NRC Clinton Licensing Project Manager, (w/o Attachment 2)
NRC Resident Office, V-690, (w/o Attachment 2)
Regional Administrator, Region III, USNRC (2 copies w/ Attachment 2)
Illinois Department of Nuclear Safety, (w/o Attachment 2)

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Summary of Physical Security Plan (PSP) Revision 29 Changes

- Table of Contents

Chapter 8, "Response to Security Contingencies", (page iii) was revised to remove Section 8.3, "Catastrophic Compensatory Measures for a Loss of a Single MUX 1 or 2", Section 8.4, "Catastrophic Compensatory Measures for a Loss of 3 or 5 Concurrent With a Contingency Event", Section 8.5, "Catastrophic Compensatory Measures for a Total Security System Failure or Loss of Multiple MUXs", and Section 8.6, "Catastrophic Compensatory Measures for a Planned Total System Failure, Planned Loss of Multiple MUXs (1, 2, 3, or 5) and Planned Maintenance for the Computer System". A new Section 8.3, "Catastrophic Compensatory Measures for Loss of Security System/Multiplexor Units" was added to address establishing compensatory actions in accordance with CPS implementing procedures.

Chapter 11, "Security Records", (page iv) was revised to remove section 11.2, "Record Retention". Retention of security records is addressed in section 11.1, "Type of Record", Plant Security Standing Order #37, "Security Records", and CPS procedure 1017.01, "Records Management".

- Chapter 1, "Security Organization"

Section 1.5, "Security Personnel", Subsection 1.5.7, "Security Equipment", Step b.2 (page 1-9) was revised to remove reference to the shotgun and semi-automatic rifle was added. This change was made as the rifle is the designated contingency response weapon for Clinton Power Station (CPS). Subsection 1.5.9, "Security Force Composition", (page 1-10) decreased the minimum number of SFMs required on duty, and decrease the number of designated armed response individuals. These actions were justified by the successful completion of response drills with the reduced number of designated armed response individuals during the recent Operational Safeguards Response Evaluation (OSRE) Inspection at CPS. As a result of the reduced number of designated armed response individuals, the minimum number of Security Force Members (SFMs) was also reduced.

Section 1.7, "Access Authorization", Subsection 1.7.2, "Vehicles", Step 1.7.2.1 b.2, (page 1-13) was revised to add an 'and' at the end of the paragraph so that item 1.7.2.1 b.3 will be included in the definition of "Non-designated Vehicles".

- Chapter 3, "Protected Area Perimeter"

Section 3.1, "Perimeter Barrier and Isolation Zone", Subsection 3.1.2, "Physical Barriers", Step 3.1.2.2 a.7 (page 3-5) was removed as the CPS "Key Control" program and implementing procedures provide adequate direction to Operations Department personnel on key control. Step 3.1.2.2 a.8 was renumbered to Step 3.1.2.2 a.7 for formatting purposes. Subsection 3.1.3, "Illumination and Surveillance", Step 3.1.3.2 a (page 3-7) was revised to include additional compensatory actions involving the use of other stationary cameras due to

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advances in camera technology. Subsection 3.1.4, "Intrusion Detection Hardware", Step 3.1.4.4 (page 3-8) was moved from page 3-9 to page 3-8 to improve PSP formatting. In addition, this step was clarified by stating no additional patrols are required in the protected area if previously established patrols are present for existing defensive strategies. The note after 3.1.4.4 item 2 (page 3-9) was revised to add clarification on the adequacy of lighting before adding additional patrols.

Section 3.2, "Protected Area Portals", Subsection 3.2.2, "Vehicles and Cargo Access Portals and Posts", Step 3.2.2.1.2 (page 3-20) was revised to allow a certified SFM to conduct vehicle searches without oversight from a second SFM or the Alarm Station SFMs. This action is justified as SFMs receive adequate training to perform this activity without oversight.

- Chapter 4, "Protected Areas"

Section 4.3, "Illumination and Surveillance", Step 4.3.1 (page 4-2) was revised to remove the freeze frame capability requirements for the Closed Circuit Television (CCTV) around the entire Protected Area (PA) as long as lighting is adequate in the isolation zone. This clarification is justified due to advancements in camera technology. Potential intruders will be detected at the fence line thus not allowing undetected access to the unit 2 area.

- Chapter 5, "Vital Area Boundaries"

Section 5.2, "Physical Barriers", Subsection 5.2.1, "Walls and Access Doors", Step 5.2.1.1 (page 5-2) was revised to remove reference to the control of existing hardware and compensatory measures due to the 'unscalable wall' which acts as a sufficient boundary.

- Chapter 6, "Vital Areas"

Section 6.1, "Central Alarm Station (CAS)", Subsection 6.1.5, "Communications", Step 6.1.5.1 (page 6-3) was revised to remove all reference to the 'Permanent Warehouse area' in terms of communications being provided due to equipment problems with the permanently installed communication line. Compensatory communication measures have been established by the use of hand held radios.

- Chapter 8, "Response to Security Contingencies"

Section 8.1, "Response Force Availability", Step 8.1.1 (page 8-1) was revised to reduce the number of required 'on duty designated armed response individuals'. Justification for this change was the successful completion of response drills with the reduced numbers of 'designated armed response individuals' during the recent Operational Safeguards Response Evaluation (OSRE) Inspection.

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Section 8.3, "Catastrophic Compensatory Measures for a Loss of a Single MUX 1 or 2", Section 8.4, "Catastrophic Compensatory Measures for a Loss of 3 or 5 Concurrent With a Contingency Event", Section 8.5, "Catastrophic Compensatory Measures for a Total Security System Failure or Loss of Multiple MUXs", and Section 8.6, "Catastrophic Compensatory Measures for a Planned Total System Failure, Planned Loss of Multiple MUXs (1, 2, 3, or 5) and Planned Maintenance for the Computer System" were deleted. A new Section 8.3, "Catastrophic Compensatory Measures for Loss of Security System/Multiplexor Units", was added including Steps 8.3.1 and 8.3.2. This section was added to address a loss of the security system or multiplexor unit(s). This new section also addresses operations personnel's immediate access to safe shutdown equipment.

- Chapter 10, "Tests, Inspections, and Maintenance"

Section 10.2, "Surveillance System Testing", Step 10.2.8.2 (page 10-3) was revised to remove the reference to Multiplexor Unit 4C being exempt from testing after maintenance because this unit has direct input points to test (e.g., CCTV circuit switcher). Other measures have been established which allow for testing of this equipment.

Section 10.4, "Other Detectors", Step 10.4.3 (page 10-5) was revised to rename 'operational checks' to 'specification test' to clarify which organization is responsible for the performance of these tests (CPS Instrument & Calibration (I&C) Technicians, not SFMs).

Section 10.6, "Security Personnel Equipment", Step 10.6.1 (page 10-5) was revised to reference the rifle as the rifle is the designated contingency response weapon for CPS.

- Chapter 11, "Security Records"

Section 11.2, "Record Retention", and Step 11.2.1 (page 11-3) were deleted. Retention of security records is addressed in the PSP Section 11.1, "Type of Record", Plant Security Standing Order #37, "Security Records", and CPS procedure 1017.01, "Records Management".

- Appendix A, "Definitions"

The definition of "Physical Barrier" (page A-3) was changed to correct a typographical error. The number '300' was revised to '30' and the degree symbol was revised.

The definition of "Security Force Member (SFM)" (page A-5) was revised to change the word 'uniformed' to 'certified'. This change was made to take credit for certified SFMs who are not in uniform.

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- Appendix B, "Training and Qualification Table of Contents"

Section 3.2, "Weapons Qualification and Requalification Program", Step 3.2.2 (page i) was revised to replace the word 'Shotgun' with 'Rifle' as the rifle is the designated contingency response weapon at CPS.

Section 1.0, "Employment Suitability and Qualification Criteria", Subsection 1.3, "Physical Fitness Qualifications", Step 1 (page 1-1) was revised to reflect the CPS defensive strategy. The sentence after Step 4 (page 1-2) was revised to address a time limit for test completion.

Section 2.0, "Training and Qualifications", Subsection 2.1, "Training" (page 2-1) was revised to remove the requirement for a written examination to be administered as part of SFM requalification. This change was implemented to align CPS with the rest of the industry based on the response from industry benchmarking. Subsection 2.2, "Qualification Requirements", Step 2.2.3, "Duty Qualifications", (page 2-3) was revised to correct a typographical error. The word 'workshe6t' was changed to 'worksheet'.

Section 3.0, "Weapons Training, Qualification and Requalification", Subsection 3.2.2 (page 3-2) was revised to remove reference to the shotgun and replaced with the rifle as the rifle is the designated contingency response weapon for CPS. In addition, the qualification/requalification requirements and the minimum test scores for the rifle were added/revised.

Section 4.0, "Security Force Member Equipment", Subsection 4.1, "Firearms" (page 4-1) was revised to remove reference to the shotgun and replaced with the rifle as the rifle is the designated contingency response weapon for CPS. Subsection 4.2, "Ammunition", Step 4.2.1, "Ammunition - On Duty", (page 4-1) was revised to change the reference number of rounds of ammunition available for the shotgun to the number of rounds of ammunition available for the rifle as the rifle is the designated contingency response weapon for CPS. Subsection 4.3, "Contingency Equipment", Step c (page 4-1) was revised to reflect the rifle as the designated contingency response weapon for CPS.

Table A, "Training", "Clinton Power Station Security Force Curriculum for a Stores Employee", (page A-5) was added to address task subjects required for stores personnel to perform searches of materials and equipment. "Clinton Power Station Security Force Curriculum for Security I&C Technician", (page A-6) was added to address task subjects required for I&C Technicians to perform compensatory measures during maintenance activities.

Table B, "Individual Responsibility Matrix", Crucial Task #19 (page B-4) was revised to reflect the rifle as the rifle is the designated contingency response weapon for CPS.

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Table C, "Position Descriptions"

The position description for the "Watchman" (page C-2) was revised to replace 'uniformed contract employee' with 'certified contract employee' to match the definition given in Appendix A.

The position description for the "Unarmed Security Force Member (SFM)" (page C-3) was revised to replace 'uniformed contract employee' with 'certified contract employee' to match the definition given in Appendix A.

The position description for the "Armed Security Force Member" (page C-4) was revised from 'uniformed security force member' to 'certified security force member' to match the definition given in Appendix A. In addition, contingency equipment was revised to reflect the rifle as the designated contingency response weapon for CPS. The number of rounds of required ammunition was also revised to reflect the rifle as the contingency weapon.

The position description for the "Operations Lieutenant" (page C-6) was revised from 'uniform contract employee' to 'certified contract employee' to match the definition given in Appendix A. In addition, contingency equipment was revised to reflect the rifle as the designated contingency response weapon for CPS. The number of rounds of required ammunition was also revised to reflect the rifle as the contingency weapon.

The position description for the "Security Shift Leader" (page C-7) was revised from 'uniform contract employee' to 'certified contract employee' to match the definition given in Appendix A. In addition, contingency equipment was revised to reflect the rifle as the designated contingency response weapon for CPS. The number of rounds of required ammunition were also revised to reflect the rifle as the contingency weapon.

Table D, "Task Outline and Description"

Task #19 (page D-11) was revised to reflect the rifle as the designated contingency response weapon for CPS. In addition, the minimum qualifying score was revised to reflect the rifle as the designated contingency response weapon for CPS.

Task #27, "Response To/Assess Perimeter Intrusion Alarm" (page D-15) was revised to add 'Security I&C Technician' to the standard. The technicians may assist in a compensatory measure while performing his/her duties.

Task #31, "Respond To/Assess Vital Area Intrusion Alarm" (page D-18) was revised to add 'Security I&C Technician' to the standard. The technician may assist in a compensatory measure while performing his/her duties.

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- Appendix C, "Contingency Planning"

Section 3.2, "Security Organization", Subsection 3.2.2, "Security Shift Leader", (page 3-2) was not revised; however, the page was given a new revision number and a revision bar was incorporated in error.

- Figure 2-3, "Protected Area"

The 'Ice House' building was removed from Figure 2-3 to reflect the removal of this structure.

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