

444 South 16th Street Mall Omaha NE 68102-2247

> March 31, 2003 LIC-03-0047

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

References:

- 1. Docket No. 50-285
- 2. Letter from NRC (Samuel J. Collins) to OPPD (W. Gary Gates) dated January 7, 2003, Issuance of Order for Compensatory Measures Related to Access Authorization (NRC-03-001)
- 3. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk dated January 27, 2003, Response to Commission Order to Modify License for Compensatory Measures Related to Access Authorization (LIC-03-0005)
- 4. Letter from OPPD (D. J. Bannister) to NRC (Document Control Desk) dated January 27, 2003, Answer to Commission Order to Modify License for Compensatory Measures Related to Access Authorization (LIC-03-0006)

SUBJECT: Clarification of Response to Order for Compensatory Measures Related to Access Authorization

In accordance with 10 CFR 50.4, Omaha Public Power District (OPPD) hereby submits information in response to the Order for Compensatory Measures Related to Access Authorization (hereinafter "Order") issued by the United States Nuclear Regulatory Commission ("NRC") on January 7, 2003 (Reference 2). This information is being submitted in response to a telecom with the NRC dated March 7, 2003. This submittal supersedes and clarifies the information provided in Reference 3. This submittal does not alter the information provided in OPPD's Answer to the Order (Reference 4).

OPPD has begun implementation of the requirements of Attachment 2 of Reference 2. OPPD will complete implementation no later than July 7, 2003, with the exception of compensatory measure (CM) B.1.1 which OPPD will implement no later than April 7, 2003, and CMs C.1.6 and C.1.8 which OPPD will implement no later than January 7, 2004. This schedule is consistent with the requirements of Reference 2.

With reference to CM B.1.3(c), OPPD will use the program administered by the Bureau of Citizenship and Immigration Services (formerly the Immigration and Naturalization Service) to verify identification numbers other than social security numbers to the extent possible. OPPD will confirm employment eligibility for new employees, to the extent possible, using

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the currently available methods, which may include the confirmation of social security numbers during the investigation of other program elements such as a credit check, as well as the completion of Form I-9. OPPD will rely upon the I-9 process as implemented by contractors/vendors to ensure contractor/vendor employment eligibility and OPPD will remind contractors/vendors to use the I-9 process.

This letter contains the following commitments:

- OPPD will complete Order implementation no later than July 7, 2003, with the exception of CM B.1.1 which OPPD will implement no later than April 7, 2003, and CMs C.1.6 and C.1.8 which OPPD will implement no later than January 7, 2004. (AR 31916)
- With reference to CM B.1.3(c), OPPD will use the program administered by the Bureau of Citizenship and Immigration Services to verify identification numbers other than social security number to the extent possible. (AR 31916)
- With reference to CM B.1.3(c), OPPD will confirm employment eligibility for new employees, to the extent possible, using the currently available methods. (AR 31916)
- With reference to CM B.1.3(c), OPPD will rely upon the I-9 process as implemented by contractors/vendors to ensure contractor/vendor employment eligibility and OPPD will remind contractors/vendors to use the I-9 process. (AR 31916)

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I declare under penalty of perjury that the foregoing is true and correct and copies of the response were sent to the addressee and listed individuals. (Executed on March 31, 2003).

If you have additional questions, or require further information, please contact Dr. R. L. Jaworski at (402) 533-6833.

Sincerely,

R. T. Riflenour

Division Manager Nuclear Operations

RTR/TRB/trb

c:

Annette L. Vietti-Cook, Secretary, NRC Office of the Secretary, Rulemakings and Adjudications Staff

Samuel Collins, Director, NRC Office of Nuclear Reactor Regulation

Dennis C. Dambly, NRC Assistant General Counsel for Materials Litigation and Enforcement

E. W. Merschoff, NRC Regional Administrator, Region IV (two copies)

A. B. Wang, NRC Project Manager

J. G. Kramer, NRC Senior Resident Inspector

Winston and Strawn