

November 8, 2007

Donna Cuthbert
The Alliance For A Clean Environment
P.O. Box 3063
Stowe, PA 19465

Dear Donna:

I am responding to your letter and e-mail to me dated October 4, 2007, which detailed the concerns of the Alliance for a Clean Environment (ACE) regarding security at the Limerick Nuclear Plant. In particular, you raised concerns regarding security staffing and the performance of the Wackenhut security organization at Limerick in light of past security performance issues, such as the inattentive security officers noted at Peach Bottom.

As you know, the NRC conducted an Augmented Inspection Team (AIT) at the Peach Bottom Atomic Power Station at the end of September; a public exit meeting by the inspection team was held near Peach Bottom on October 9. Unfortunately, as you indicated to me, you were unable to attend due to a schedule conflict; thus I am enclosing a copy of the NRC slide presentation made at that meeting, which discusses in detail our findings in this matter as well as Exelon's short-term corrective actions. The AIT inspection report was issued on November 5, 2007; a copy of the report is attached.

In your letter to me, you asked a number of detailed questions regarding the security organization at Limerick. While I would like to be fully responsive to your questions, I am limited in what details I can provide you since much of it is classified as safeguards information. Specifically, I can not reveal either the total number of security officers at Limerick, or the number on each shift. However, I can confirm that the NRC periodically checks security staffing via its baseline inspection program to ensure that Exelon meets the Limerick security plan requirements approved by the NRC.

With regard to security officer working hours, the NRC imposed more restrictive security officer working hours in 2003 following the significant increase in security requirements imposed post-9/11. Those security officer working hour restrictions are delineated in an NRC order issued April 29, 2003, to all operating power reactors; a copy of that order is also attached. The NRC will be implementing new requirements next year that will further limit the number of hours that can be worked by security officers. The NRC routinely reviews security officer staffing and working hours to ensure compliance with NRC regulations and order requirements. No violations in this area were noted during our last security inspection at Limerick. Our licensees are required to track the working hours of individual security officers; while the NRC reviews such information during inspections at Limerick, we do not retain or release specific information such as average or maximum overtime hours worked per day or week.

With regard to NRC inspection of security officer activities, the NRC resident and security specialist inspectors perform periodic inspections of security officer activities; some of these inspections occur on backshift, often incidental to our inspection of other reactor safety activities ongoing at that time. The details of these inspections are documented in security inspection reports that contain safeguards information and thus are not available for public review. Recently, copies of the letter documenting security inspections have been made available

electronically for public review in the NRC's document management system ADAMS. This document management system is accessible from the NRC website at www.nrc.gov. While NRC security reports are not available for public review, these NRC inspection activities are open for review by the NRC Office of Inspector General. If you believe the NRC has been negligent in its security oversight of Wackenhut security guards at Limerick, you can contact that office at (800) 233-3497.

Finally, with regard to the contracting of security forces to outside vendors, the NRC does not dictate the selection process of our licensee's security force vendors. Our regulatory responsibilities are directed toward the qualification and performance of the guard force members, and we hold NRC licensee's accountable for their performance.

If you have, or obtain, information regarding specific instances of security officer inattentiveness to duty at Limerick, or specific instances where security officers are currently distracted to the point they are not able to perform their duties when required, please promptly provide that information to this office. The NRC has identified inattentive security officers at several nuclear sites in the course of our inspection activities. However, as stated at the AIT public exit meeting, it is often difficult for the NRC to identify or confirm all cases of security officer inattentiveness to duty.

We appreciate your concerns in this matter and trust that we have been responsive.

Sincerely,

/RA/

Richard S. Barkley, PE
Technical Communications Assistant

Enclosures: 1) Peach Bottom AIT Exit Meeting Slides
2) Peach Bottom Augmented Inspection Team (AIT) Report
3) April 29, 2003, Security Order on Fitness-For-Duty Enhancements

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Richard S. Barkley, PE
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