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Peach Bottom Atomic Power Station
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November 2, 2007

Mr. Samuel J. Collins
Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Subject: Response to October 4, 2007 letter from Samuel J. Collins (U.S. Nuclear Regulatory Commission) to Christopher M. Crane (Exelon Generation Company, LLC)

Reference: Letter from Samuel J. Collins (U.S. Nuclear Regulatory Commission) to Christopher M. Crane (Exelon Generation Company, LLC) dated October 19, 2007 (Confirmatory Action Letter 1-07-005)

Dear Mr. Collins:

Pursuant to the subject letter, you requested that we submit a letter to you describing, in addition to the actions we have already taken to ensure officers are currently attentive to their duties, the actions that we have taken or have planned to assure the following:

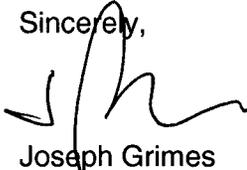
- (1) security officers *remain* attentive *at all times* while on duty in all required locations at the facility;
- (2) security officers are both willing and able to recognize instances of inattentiveness and promptly take all appropriate actions;
- (3) supervisors and personnel take the necessary actions to encourage officers and all plant staff to bring forward any concerns, including indications of inattentiveness, and promptly address such concerns when raised; and
- (4) inattentiveness does not extend to other departments or contractors at Peach Bottom.

In addition, you also requested that we address why this issue was apparently not identified by Exelon. Please find our response to your request in Attachment 1. Exelon remains confident of the ability of the security force at Peach Bottom Atomic Power Station (PBAPS) to effectively implement the Security Plan. Security program effectiveness is being ensured through the implementation of previously described interim actions and increased management oversight of security activities at the station.

Pursuant to the reference letter, we are required to notify you in writing when we have completed our review and have identified the final corrective actions from our root cause analysis for the inattentive security officers. The root cause analysis for this incident was completed on October 25, 2007. The final corrective actions have been identified and have been entered into our corrective action program (CAP) for resolution.

Please contact me if you have questions in regard to the information provided.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Grimes', with a stylized flourish at the end.

Joseph Grimes
Vice President
Peach Bottom Atomic Power Station

CCN: 07-111

In addition to the actions we have already taken as provided in our October 9, 2007 correspondence to you to ensure officers are currently attentive to their duties, the actions that we have since taken or have planned to assure the following statements are noted below:

- (1) security officers *remain* attentive *at all times* while on duty in all required locations at the facility.

Response:

Access to the staging area where the inattentiveness incidents took place has been modified to allow for improved management oversight.

Access to other staging areas, both at Peach Bottom and the remaining Exelon Nuclear operating reactor sites, has been evaluated and necessary changes have been made to improve management oversight in those areas.

Post inspections were upgraded to include regular inspections of the ready room.

Post assignments for the Peach Bottom security shifts have been revised so that security force personnel will not be assigned to a single post for the entire shift.

The process of conducting communication checks will be upgraded to ensure better identification of security officers being monitored and to also require random communication checks to occur. This will be complete by December 14, 2007.

Attentiveness aids that are permitted in the staging areas for Peach Bottom and Exelon Nuclear operating reactor sites to improve the ability of the security force members to remain attentive have been reviewed and revised.

- (2) security officers are both willing and able to recognize instances of inattentiveness and promptly take all appropriate actions.

Response:

Security officers and supervision that did not pass the selection process were relieved from duty and will not be part of the Exelon security force at PBAPS.

Indoctrination sessions have been conducted with those returning security force members to reinforce expectations regarding the behavioral observation program and a healthy Safety Conscious Work Environment (SCWE).

Face-to-face interviews with security force supervisors to reinforce expectations related to inattentiveness and actions to take if someone is found in an inattentive state, and to solicit feedback on challenges to maintaining attentiveness and raising issues will be conducted by December 14, 2007.

The participation of security force officers in focus teams to resolve concerns raised in SCWE surveys will be institutionalized by January 26, 2008.

- (3) supervisors and personnel take the necessary action to encourage officers and all plant staff to bring forward any concerns, including indications of inattentiveness, and promptly address such concerns when raised

Response:

The Peach Bottom Site Vice President and Plant Manager have conducted meetings with the Peach Bottom security force personnel reinforcing their expectations regarding raising concerns and resolving issues, as well as the mechanisms available to personnel for communicating concerns.

Supervisory training for security force supervisors regarding their responsibilities for maintaining a SCWE will be conducted by December 14, 2007.

Communication for the balance of the Peach Bottom staff from the Plant Manager to reinforce expectations regarding reporting of issues has been completed.

We will conduct a SCWE survey of the Peach Bottom security organization with the assistance of resources external to Exelon by December 21, 2007.

Security officers will receive identifications in the computerized corrective action program to enable them to directly enter issues or concerns into the CAP. This will be completed by December 28, 2007.

- (4) inattentiveness does not extend to other departments or contractors at Peach Bottom

Response:

A supervisory brief was issued on September 24, 2007 to notify personnel of the termination of the WNS contract and to reinforce proper behaviors to the site workforce regarding attentiveness and use of the reporting processes.

Communication for the balance of the Peach Bottom staff from the Plant Manager to reinforce expectations regarding reporting of issues has been completed.

We will review contract maintenance / project management oversight to determine if similar concerns exist. The intent of this review is also to evaluate how well contract forces oversee safety culture and SWCE issues. This review will be completed by February 15, 2008.

We will perform longer term additional interventions to ensure that all site personnel including supervisors are aware of their responsibilities to report suspected adverse behaviors in accordance with the CAP, Employee Concerns Program (ECP) and/or Behavioral Observation Program (BOP). This intervention should use examples of what is covered under BOP and should emphasize other elements (i.e., fatigue, aggressive behavior) instead of just drugs and alcohol. This activity will be completed by February 29, 2008.

We will perform a SCWE survey for other site contactors by March 21, 2008. Results will be evaluated and appropriate actions implemented as required.

It was determined that other regulatory-required watch-standing positions that are readily observable did not have similar concerns. For other watch-standing areas that are not readily observable, actions will be taken to assess attentiveness aids, communications checks, watch-standing rotation and post checks for these positions. This will be complete by January 4, 2008.

In addition, you also requested that we address why this issue was apparently not identified by Exelon.

Response:

As part of the investigation into security officer inattentiveness, Exelon conducted a root cause evaluation into how these events could have happened. It was determined that inadequate Exelon management oversight and weak leadership of Wackenhut Nuclear Security (WNS) management to ensure appropriate Security force performance was a primary root cause of this event. The second root cause involved the lack of Security contractor's management and supervisory oversight of human performance behaviors to ensure that inattentiveness did not occur and that any behavior concerns would be promptly detected and corrected. A third root cause involved an adverse culture within the security organization at PBAPS that resulted in an environment of not reporting (either self-reporting or peer reporting) inappropriate human behavior. A culture had developed among some of the Team 1 security officers to not report inattentiveness in the staging area (ready room). The investigation revealed that security force personnel may have thought it was more important to protect other officers than raise the issue of inattentiveness and some believed that they could respond if needed. Corrective actions to resolve these root causes are being taken in accordance with the site corrective action program.