



**INDIANA  
MICHIGAN  
POWER®**

*A unit of American Electric Power*

**Indiana Michigan Power**  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
AEP.com

February 11, 2008

AEP:NRC:8054  
10 CFR 50.54(f)

Docket Nos.: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
RESPONSE TO NUCLEAR REGULATORY COMMISSION  
BULLETIN 2007-01: SECURITY OFFICER ATTENTIVENESS

Reference: Nuclear Regulatory Commission Bulletin 2007-01, "Security Officer Attentiveness,"  
dated December 12, 2007.

The U. S. Nuclear Regulatory Commission (NRC) issued the referenced bulletin to obtain information necessary to determine the status of licensee programs regarding the adequate and consistent implementation of their security programs in light of recent security-based incidents at certain sites.

The NRC requested that licensees provide information within 60 days of the date of the bulletin regarding administrative programs and managerial programs and controls established to prevent, identify and correct security personnel inattentiveness, especially complicity, and failures to implement the behavior observation program by individuals among licensee security personnel, including security contractors and subcontractors. The enclosure to this letter provides Indiana Michigan Power Company's response to the bulletin.

There are no new or revised commitments in this letter. Should you have any questions, please contact Mr. James M. Petro, Jr., Regulatory Affairs Manager, at (269) 466-2491.

Sincerely,

Joseph N. Jensen  
Site Support Services Vice President

RSP/rdw

A132

NRR

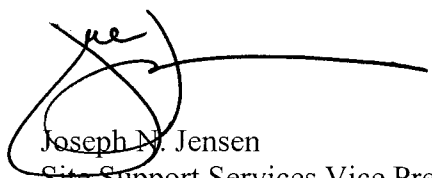
Enclosure: Indiana Michigan Power Company Response to NRC Bulletin 2007-01: Security  
Officer Attentiveness

c: J. L. Caldwell, NRC Region III  
K. D. Curry, AEP Ft. Wayne, w/o enclosure  
J. T. King, MPSC  
MDEQ – WHMD/RPMWS  
NRC Resident Inspector  
P. S. Tam, NRC Washington, DC

**AFFIRMATION**

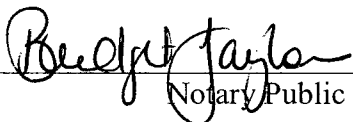
I, Joseph N. Jensen, being duly sworn, state that I am Site Support Services Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company

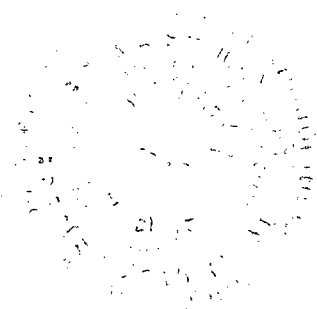
  
Joseph N. Jensen  
Site Support Services Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 11 DAY OF February, 2008

  
\_\_\_\_\_  
Notary Public

My Commission Expires 6/10/2013



INDIANA MICHIGAN POWER COMPANY RESPONSE TO  
NRC BULLETIN 2007-01  
SECURITY OFFICER ATTENTIVENESS

The U. S. Nuclear Regulatory Commission (NRC) issued Bulletin 2007-01 to obtain information necessary to determine the status of licensee programs regarding the adequate and consistent implementation of their security programs in light of recent security-based incidents at certain sites.

The NRC requested that licensees provide information within 60 days of the date of the bulletin regarding administrative programs and managerial programs and controls established to prevent, identify and correct security personnel inattentiveness, especially complicity, and failures to implement the Behavior Observation Program (BOP) by individuals among licensee security personnel, including security contractors and subcontractors. This enclosure provides Indiana Michigan Power Company's (I&M) response to the bulletin.

**NRC Bulletin 2007-01 Question 1**

*How do you identify, report and document human performance issues involving inattentiveness, especially complicity among licensee security personnel including security contractors and subcontractors? Include a description of actions staff and supervisors take to prevent, identify and correct instances of security personnel inattentiveness, especially complicity, and address how employee concerns related to security personnel inattentiveness and complicity are addressed.*

*Examples of the types of information to include when providing your response to Question (1) are:*

- a. Describe the means used to maintain the attentiveness and vigilance of your security personnel such as through the effective use of job/post rotations: communication checks, (audio/visual) audio stimuli; (e.g. radio), and other attentiveness stimuli for security posts where appropriate, based on the nature of the duties.*
- b. Describe how you ensure that environmental conditions such as temperature, humidity, lighting, and noise levels do not degrade attentiveness or vigilance.*
- c. Describe how you monitor the attentiveness and vigilance of security personnel such as through behavioral observation by supervisors/managers, behavioral observation by peers, and video surveillance.*

**I&M Response to Question 1**

I&M recognizes the importance of a safety conscious work environment (SCWE) where individuals feel free to raise safety concerns and feel confident that those concerns will be promptly reviewed and resolved with a priority appropriate to their significance. I&M is committed to maintaining an environment where individuals' concerns and issues about safety are immediately recognized and addressed. We need everyone identifying and resolving issues in order to maintain the safe and efficient operation of our facility. I&M values an environment in which the raising of issues or expressing alternate points of view is encouraged and sought out. Equally important, when issues are raised, I&M must take the right actions, and demonstrate that we are taking the right actions. Failure to do so discourages people from raising issues.

I&M provides initial training on the importance of a SCWE in Generic Plant Access Training. The importance is reinforced through continuing training and communications from Executive Management to all individuals.

Individuals are encouraged and expected to promptly report concerns and issues to supervision for resolution under one or more existing Donald C. Cook Nuclear Plant (CNP) programs. These programs include the Corrective Action Program (CAP), Employee Concerns Program (ECP), Access Authorization, Fitness for Duty (FFD), and Human Resources. Alternatively, the individual may report directly to any of these programs or to the NRC.

The Behavior Observation Program (BOP) is designed to make all employees with unescorted access aware of their responsibilities to recognize individual behavior which, if left unattended, could lead to acts detrimental to public health and safety. A key objective of the program is the recognition of behavior that is adverse to the safety and security of the facility, including an unusual interest in, or predisposition towards, security and/or involvement in operations activities outside the normal work activities scope.

All personnel with unescorted access receive initial BOP training and annual BOP testing. Employees monitor the behavior of other personnel with unescorted access. BOP monitoring is most effective when conducted by the employee's immediate supervision or co-worker because these individuals have frequent interaction with the individual and are most likely to recognize changes in behavior. All personnel are expected to identify and report acts detrimental to public health and safety, including security officer inattentiveness. Individuals are encouraged to promptly report BOP observations to supervision for resolution under one or more existing CNP programs. These programs include the CAP, ECP, Access Authorization, FFD, and Human Resources. Alternatively, the individual may report directly to any of these programs or to the NRC.

On an annual basis, supervision and management formally document that BOP monitoring has been performed. Individuals are required to report arrests and other issues that may impair their

FFD. This review is performed and documented by supervision which typically includes behavior deviations reported to, or observed by, the supervisor. The supervisory review is evaluated by an individual responsible for the Access Authorization Program to determine if additional action is required concerning the individual's trustworthiness, reliability, and FFD. Monitoring for both SCWE and BOP is accomplished through periodic assessments of the other reporting programs noted above. Program effectiveness is periodically assessed by the licensee through self-assessments, Nuclear Safety Review Board (NSRB) reviews, SCWE surveys, and CAP review boards. Additionally, independent reviews are conducted by the Institute of Nuclear Power Operations (INPO), the NRC, and industry peer review teams.

Other methods used to identify security performance issues include:

- Routine shift briefing fatigue declaration – This declaration is discussed at the beginning of each security shift with the officers. A CNP procedure (Security Working Hour Limitations) discusses the processes for security officers to make these declarations.
- Self identification – Officers are encouraged to identify mistakes so that appropriate corrective actions can be taken.
- Peer and general employee observations.
- Security management and supervisory observations – The contractor performs back shift visits to monitor and discuss issues relating to the management of personnel.
- Nuclear Oversight observations – NSRB personnel perform observations and interviews with security personnel. These observations are shared with I&M management for resolution.
- Communication checks – Security personnel are polled every hour until midnight, and then every half hour until 0600.
- Technology aids – Closed circuit television cameras have been installed to provide the capability to assess officers located in positions adjacent to the Protected Area perimeter. These cameras may be monitored in either the Central Alarm Station (CAS) or Secondary Alarm Station (SAS). In addition, door logs are used to confirm that appropriate patrols have been completed within specified time frames.
- Facility design – Security positions are monitored to provide a comfortable environment for the officers to occupy. Areas where loud noise or high temperatures exist are areas where the rotation of the officers occurs more frequently to prevent the environment from affecting the officer's attentiveness.
- Exit interviews – Personnel are provided the opportunity to meet with an ECP representative to discuss any issues that the employee experienced while at CNP. These issues are then addressed with Senior Management and addressed accordingly with the appropriate department on an as needed basis.

Methods used to report security performance issues include:

- CAP – Which provides a formal process for reporting issues. These issues are then reviewed by both an Initial Screening Committee and a Management Screening Committee, which provide the appropriate oversight based upon the significance of the issue and the appropriate organization to respond to the issue.
- Direct contact with Security Management and/or supervision - CNP personnel are provided the opportunity to report any issues with security program performance to either the Security Manager, Access Authorization/FFD Supervisor, or other security supervision.
- Contact with CNP non-security management and/or supervisory personnel - Other CNP non-security management personnel receive reports from their own employees who advise them of issues concerning the security program performance and allow those issues to be addressed with Security Management.
- Safeguards Event Log – Provides a method of recording those events which have been identified as a degradation of the security program and for which appropriate compensatory actions have been taken.
- Contact with Nuclear Oversight/Performance Assurance (PA) personnel – Contact with Nuclear Oversight personnel is conducted during specific periods, normally quarterly. This program allows for external personnel to observe and comment on security processes and personnel. PA personnel meet with the Security Manager on a periodic basis to provide overall observation comments and address concerns.
- Contact with licensee and/or contractor ECP personnel - Security personnel and CNP personnel have addressed security concerns through the ECP and sought responses from security to those issues. Additionally, the contractor has initiated an ECP survey which is submitted monthly to the corporate contractor office for compilation and determination if additional actions are necessary. A survey of security personnel at CNP was conducted by the licensee's ECP with favorable results.
- Access Authorization/FFD Program – The Access Authorization/FFD program provides a process for the behavioral observation of CNP personnel, both contractor and licensee. These programs provide the bases for ensuring personnel are trustworthy and reliable in the performance of their duties.

Processes for documenting and addressing security inattentiveness and complicity normally include a review by management, an investigation, identification and tracking of corrective actions, and effectiveness reviews.

Methods used to document and address security performance issues:

- CAP (Investigation) – This process is used to document security performance issues. The process requires an evaluation of the issues and, as appropriate, implementation and tracking any required corrective actions.
- Self-Assessment reports – The security department participates in the CNP process of performing self-assessments. These assessments include the observation and verification of the appropriate processes completed by security personnel.
- Safeguards Event Log – This log provides a chronological list of the events affecting security processes in accordance with the Security Plan. This log includes a reference to the CAP and a brief description of the event.
- ECP – This program allows personnel to address issues outside of the Security or CNP Management process. This process allows for independent review of the facts concerning the performance issues.
- Coaching Log books – CNP and security contractor supervisors are provided with Coaching Log books. These books provide each supervisor a location to document both positive and negative observations. These books can be reviewed periodically by management personnel for significant issues and acknowledgements.

I&M uses a variety of methods to prevent (p), identify (i), and correct (c) incidences of security personnel inattentiveness, and complicity, to ensure that security personnel can perform their assigned duties and responsibilities, maintain continuous communication with CAS/SAS, and are immediately available to respond at all times. Items described below were implemented prior to Safeguards Advisory SA-07-06 and remain in effect today.

- Security shift management/supervision conducts routine random twice weekly security post checks. (p, i, c)
- Security post rotations are completed at an interval of nominally once per two hours on all posts. (p)
- CAS/SAS operators conduct communication/status checks with security personnel by radio or radio and phone on a regular hourly basis, and every half hour after midnight until 0600 hours. (p,i,c)
- Security officers are expected to do peer checks and provide post relief, or breaks, to security personnel when needed. (p,i,c)
- Security personnel are authorized to utilize alertness aids such as radio, reading material, computers, video surveillance, internet access, DVD video, on certain posts where these aids will not detract from their primary responsibilities. (p)
- Security supervisors conduct a pre-job briefing at each shift rotation and observe oncoming shift personnel for signs of fatigue and provide each individual the opportunity to self-declare fatigue, with no adverse impact, if they feel that they would be in danger of becoming less than alert during shift. (p,i,c)
- Security personnel receive Safety Culture and SCWE training. (p,i)
- Security personnel receive BOP training. (p,i)



- I&M security management has assessed each security post and facility to determine if conditions could negatively impact attentiveness or vigilance and determine appropriate mitigation measures. (p,c)
- Security overtime is managed within the existing work hour requirements. (p)

### **NRC Bulletin 2007-01 Question 2**

*How do you ensure that all employees and contractors report security concerns and any perceived security conditions that reduce the safety or security of a licensee facility? How do you ensure that staff is aware that there is no retaliation for self-reporting of inattentiveness or complicity or for reporting others?*

### **I&M Response to Question 2**

All employees and contractors with unescorted access authorization are required to adhere to all CNP policies and procedures. They are required to report any adverse condition to quality and safety, including any perceived security conditions that reduce the safety or security of a licensee facility. I&M has initiated the actions described in the response to Question (1) to ensure that all personnel are cognizant of the requirement to report these concerns. I&M is utilizing management oversight, self assessments, safety culture surveys, and employee interviews that provide indications of the effectiveness of facility programs, policies, procedures, training, and communications in engaging employees in this requirement. Identified areas for improvement are entered into CNP's CAP.

It is I&M's policy (PMI-2015, Policy for Maintaining a Safety Conscious Work Environment) that retaliation of any kind for reporting of any concern, including a security issue, will not be tolerated. This information is communicated to CNP personnel by the Generic Plant Access Training program which specifically addresses the fact that "you can request to remain anonymous and you cannot be discriminated against or otherwise harassed for reporting concerns." Posters are displayed throughout CNP describing the ECP program and brochures are provided describing the process in detail for all CNP employees.

Over the past two years, CNP supervisors and managers have participated in a workshop aimed at sensitizing them to the advantages of creating and maintaining a healthy Safety Culture and SCWE. This workshop focused on the behaviors required of leaders to ensure workers feel comfortable identifying and reporting issues and concerns that affect the safe operation of CNP. A similar workshop is presently being provided to the entire organization (both employees and long term contractors) that stresses both supervisor and employee expected behaviors for maintaining a healthy SCWE. This proactive approach is aimed at encouraging an environment conducive to both reporting observed issues and self-reporting issues in which the employee may be involved.

**NRC Bulletin 2007-01 Question 3**

*How do you ensure that managers and supervisors provide oversight of BOP adherence to ensure there is no complicity to circumvent the program or failure to report wrong doing or careless disregard of the regulations?*

**I&M Response to Question 3**

I&M provides initial training on the importance of SCWE and BOP programs in the Generic Plant Access Training. The importance is reinforced through continuing training and communications from Executive Management to all individuals. Additionally, departments have daily meetings, which include contract personnel, in which current CNP issues and management focus areas are discussed.

I&M oversight of SCWE and BOP programs is provided by review of surveys and interviews of personnel. The contract security company also performs SCWE surveys of the security personnel to assess their willingness to report issues and takes action for surveys that indicate the program is not effective.

Prior to receiving SA-07-06, these issues relating to security officer inattentiveness were shared with security personnel. Part of the distribution of this information was that officers at CNP have the ability to report these types of issues to their management, Contract SCWE program, I&M's ECP, or the NRC. Immediately following the SA-07-06, a survey was conducted by I&M personnel of the officers relative to their willingness to report such events and their expectation that management would take the appropriate corrective actions. The survey concluded that the officers were comfortable in reporting these issues, and that management would take the appropriate corrective actions. I&M's security contractor conducts monthly SCWE surveys of a select number of CNP's security personnel. These results are tabulated into a report and provided to both the contractor senior management and I&M management. If the results of the survey are less than satisfactory, actions are taken to improve performance.

Additionally, supervisory engagement in the SCWE and BOP programs is evidenced by management directed for-cause drug and alcohol testing, post-accident testing, near-miss testing, psychological evaluations, Employee Assistance Program (EAP) referrals, Medical Review Officer evaluations, etc.

**NRC Bulletin 2007-01 Question 4**

*What are the results of any self-assessments performed within the last 2 years associated with the items above? Specifically, what do you do to assess the effectiveness of your employee access authorization program?*

- a. Provide a summary of each assessment that details the objective and the identified results of each assessment.*
- b. Summarize any program changes and enhancements, follow-up activities and other actions you have taken as a result of each self assessment.*

**I&M Response to Question 4**

I&M has conducted self-assessments of the programs described in Question (1). These assessments have indicated that the programs are effective in assuring that the programs are providing the expected results. In addition, the NSRB does perform oversight and interviews of security personnel for issues and concerns of those officers. The results of the self-assessments and the NSRB have indicated that the security program is effective.

I&M has conducted two self-assessments on the Access Authorization/FFD Programs within the last two years. The results of the assessments indicate that the program has been implemented in accordance with Access Authorization and FFD regulations. The program has been assessed to determine if personnel, including employees and supervisors, are aware of the requirements to monitor personnel for aberrant behavior and the appropriate reporting of these behaviors. Specifically, during a recent assessment, interviews were conducted with CNP employees and supervisors to gauge their understanding of the BOP and EAP program. The results of those interviews indicated that employees are aware of the programs, the appropriate behaviors, and the reporting requirements. There were no programmatic changes identified in any of the assessments.

**NRC Bulletin 2007-01 Question 5**

*How do you assess the effectiveness of your oversight of contractors and subcontractors?*

**I&M Response to Question 5**

It is understood that the intent of this question is focused on licensee oversight of adherence to BOP requirements with regard to reporting security officer inattentiveness by all contractors granted unescorted access authorization.

I&M does not differentiate between licensee employees and contractors or subcontractors in implementation of access authorization, FFD, BOP, or SCWE.

I&M requires that all contractors and subcontractors granted unescorted access authorization adhere to all CNP policies and procedures including the requirement to report security officer inattentiveness.

I&M assesses the effectiveness of its oversight of contractors and subcontractors by surveys, the CAP, and nuclear oversight observations.