

February 11, 2008

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-05472



Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
RESPONSE TO NRC BULLETIN 2007-01,
"SECURITY OFFICER ATTENTIVENESS"**

Enclosed is the Union Electric Company (AmerenUE) 60-day response to NRC Bulletin 2007-01, "Security Officer Attentiveness," dated December 12, 2007. The bulletin was issued to request information regarding administrative programs and managerial programs and controls established to prevent, identify and correct security personnel inattentiveness and, especially complicity, and failures to implement the Behavior Observation program (BOP) by individuals among licensee security personnel including security contractors and subcontractors.

The information requested in response to the bulletin is provided in the enclosures to this letter. Enclosure 1 contains the NRC Bulletin 2007-01 questions followed by the AmerenUE response to the questions. Enclosure 2 contains additional security related information that AmerenUE considers sensitive as it discusses specific timed security operations. Therefore, AmerenUE requests that Enclosure 2 be withheld from public disclosure in accordance with 10 CFR 2.390.

This letter contains no commitments. Please contact Tom Elwood, Supervising Engineer, Regulatory Affairs and Licensing at 573-676-6479 for any questions you may have regarding this issue.

A132
NCR

ULNRC-05472
February 11, 2008
Page 2

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on: February 11, 2008



Luke H. Graessle
Manager, Regulatory Affairs

- Enclosure:
1. 60 day response to NRC Bulletin 2007-01
 2. Additional Information containing Sensitive Security Related Information

Mr. Elmo E. Collins, Jr.
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Mr. Jack N. Donohew
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-8B1
Washington, DC 20555-2738

Mr. Mohan C. Thadani (2 copies)
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-8G14
Washington, DC 20555-2738

ULNRC-05472
February 11, 2008

Index and send hardcopy to QA File A160.0761

Hardcopy:

Certrec Corporation
4200 South Hulen, Suite 630
Fort Worth, TX 76109
(Certrec receives ALL attachments as long as they are non-safeguards and may be publicly disclosed.)

**Electronic distribution for the following can be made via Responses and Reports
ULNRC Distribution:**

C. D. Naslund
A. C. Heflin
Mr. Ron Reynolds, Director (SEMA)
Mr. Edward Gray, Senior REP Planner (SEMA)
Mr. John Campbell, REP Planner (SEMA)
L. H. Graessle
G. A. Hughes
S. A. Maglio
S. L. Gallagher
L. M. Belsky (NSRB)
T. B. Elwood

Ms. Diane M. Hooper
Supervisor, Licensing
WCNOC
P.O. Box 411
Burlington, KS 66839

Mr. Scott Bauer
Regulatory Affairs
Palo Verde NGS
P.O. Box 52034,
Mail Station 7636
Phoenix, AZ 85072-2034

Mr. Scott Head
Supervisor, Licensing
South Texas Project NOC
Mail Code N5014
P.O. Box 289
Wadsworth, TX 77483

Mr. Dennis Buschbaum
TXU Power
Comanche Peak SES
P.O. Box 1002
Glen Rose, TX 76043

Mr. Stan Ketelsen
Manager, Regulatory Services
Pacific Gas & Electric
Mail Stop 104/5/536
P.O. Box 56
Avila Beach, CA 93424

Mr. John O'Neill
Pillsbury Winthrop Shaw Pittman LLP
2300 N. Street N.W.
Washington, DC 20037

Missouri Public Service Commission
Governor Office Building
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360

**AMERENUE RESPONSE TO SPECIFIC QUESTIONS IN
NRC BULLETIN 2007-01: SECURITY OFFICER ATTENTIVENESS**

Below is AmerenUE's response to NRC Bulletin 2007-01, "Security Officer Attentiveness." The bulletin's "Requested Information" is shown in bold followed by AmerenUE's response.

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.**

RESPONSE

AmerenUE 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.

AmerenUE is committed to maintaining an environment where individuals' concerns and issues about safety are immediately recognized and addressed. We encourage everyone to identify and resolve issues in order to maintain the safe and efficient operation of our facility. AmerenUE 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, AmerenUE personnel are expected to take the right actions, and demonstrate the right actions are being taken. Failure to do so discourages people from raising issues.

AmerenUE provides initial training on the importance of a SCWE in General Employee Training. The importance is reinforced through continuing training and communications from senior management to all individuals.

Individuals are encouraged and expected to promptly report concerns and issues to supervision for resolution under one or more existing plant programs. These programs include the Corrective Action Program, Employee Concerns Program, Access Authorization/Fitness for Duty Program, and Ameren Human Resources policies. Alternatively, the individual may report directly to any of these programs or to the Nuclear Regulatory Commission.

The Behavioral 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 safety and security of the station, 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 evaluation. Employees monitor the behavior of other personnel with unescorted access. BOP monitoring is most effective when conducted by the employees' immediate supervision or co-worker because these individuals have frequent interaction and will 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 of the aforementioned plant programs. These programs include the Corrective Action Program, Employee Concerns Program, Access Authorization/Fitness for Duty, and Ameren Human Resources policies. Alternatively, the individual may report directly to any of these programs or to the Nuclear Regulatory Commission.

Individuals are required to report arrests and other issues that may impair their fitness for duty. An annual 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 access authorization program reviewing official to determine if additional action is required concerning the individual's trustworthiness, reliability and fitness for duty.

Monitoring for both SCWE and BOP is accomplished through periodic assessment of the other reporting programs noted above. Effectiveness of these programs is periodically assessed by AmerenUE through self assessments, QA audits, Nuclear Safety Review Board (NSRB) reviews, Safety Conscious Work Environment assessments, Corrective

Action Review Board (CARB), or other site reviews. Additionally, independent reviews are conducted by INPO, the NRC, and industry peer review teams.

Other methods used to identify security performance issues include:

- Routine shift briefing fatigue declaration. Security Personnel are asked if there are any FFD concerns during each Shift briefing.
- Self declaration
- Security Shift inspections conducted by Supervisors. During inspections officers are normally asked if they have any concerns. Added after Safeguards Advisory SA-07-06.
- Callaway Observation program, Peer and General Employee observations.
- Security management and supervisory unannounced observations
- Ameren management and supervisory observations
- Communication checks
- Technology aids (cameras, security door logs)
- Facility design (environmental conditions, lighting, noise, etc.)
- Exit interviews

Methods used to report security performance issues include:

- Corrective Action Program
- Direct contact with Security management and/or supervision
- Contact with plant non-security management and/or supervisory personnel
- Safeguards Event Log
- Contact with QA personnel
- Contact with AmerenUE and/or Contractor Employee Concerns Program personnel
- Access Authorization/Fitness for Duty Program
- Wackenhut Safe to Say program (WNS procedure 113)
- Wackenhut Open Door Policy (WNS procedure 114)
- Contact to NRC resident inspectors
- Contact by toll free number to NRC Regional allegation coordinators
- Contact to Human Resources, either Ameren or Contractor

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

Methods used to document and address security performance issues:

- Corrective Action Program (Investigation by Supervision and or management staff)
- Self-Assessment reports

- Safeguards Event Log
- Employee Concerns Program contacts files
- NRC Allegation Program
- NRC Hotline
- Callaway Plant Observation Program
- Security Shift inspections
- Security Challenge Drills
- Security training re-qualifications

AmerenUE and the security contractor use 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 identified with an asterisk were implemented following issuance of SA-07-06:

Note 1: Enclosure 2 contains additional security information concerning specific intervals for post rotations and communication checks that AmerenUE considers sensitive. Therefore AmerenUE requests that Enclosure 2 be withheld from public disclosure in accordance with 10 CFR 2.390.

- 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 AM/FM radio, reading material, exercise equipment (available on most static posts) computers with internet access including interactive software, video surveillance, telephone, board and card games on certain posts where these aids will not detract from their primary responsibilities. (p)
- Responder rotations are set up for personnel to have walking patrols mixed in with stationary posts.(p)
- Officers in some locations are assigned duties such as CCTV patrols every 15 minutes. Other posts can have Dedicated Observer duties or other compensatory measures such as gas yard entry monitoring.
- Certain posts are under CCTV surveillance.
- Posts are climate controlled with heating and air conditioning and can be controlled by personnel posted.
- Posts in high noise areas were designed with soundproofing to dampen sounds.
- Posts are well lit.
- Most Security personnel are located in positions readily accessible to plant personnel. The only locations that are locked are those which are required.
- On shift Security Force members are allowed to trade/giveaway shifts to include between Supervisors and Security officers.
- *Security Management back shift visits conducted on a random basis enhanced were after SA-07-06.

- 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 Conscious Work Environment training. (p,i)
- Security personnel receive Behavior Observation Program training. (p,i)
- AmerenUE has set up Security positions and patrols in a manner to provide the least negative impact on attentiveness and vigilance. (p,c)
- Security overtime is managed within NRC and site work hour requirements. (p)
- Security management forecasts manning needs to ensure adequate staffing is maintained in order to prevent excessive overtime. (p)
- Security force 6 week average number of working hours for 12-3-07 to 1-13-08 was 42.0 hours. This is typical for non-outage periods.
- Lifestyle training is provided to security personnel that emphasizes the importance of adequate rest, diet, exercise, consumption of caffeine, and other issues in maintaining good health and alertness while on duty. (p)

Training has been provided in the following areas:

- WNS LP-33 – Shift Work Adaptation – Information and Techniques. (p)
- WNS LP-92 – Fitness-For-Duty Enhancement Training for Nuclear Security Supervisors. (p)
- Shift Work & Sleepiness: The Consequences – Training provided by a representative from St. Mary's Hospital Sleep Disorders Center, Jefferson City, MO. (p)
- A memorandum from Wackenhut President regarding Fitness for Duty and Fatigue was briefed to all Security Force members. (p,i,c)
- The Employee Concerns Coordinator periodically provides training on trustworthiness and reliability and raising and resolving employee concerns to Security force members, most recently during training cycle 2007-07. (p)
- Site management has established expectations through the Behavior Observation Program for integration of other site organizations into the oversight of all personnel with unescorted access to include the security organization. (p,i,c)
- The following programs/procedures have been developed or revised since the recent inattentiveness incidents:
 1. Enhanced Security management backshift visits. (p)
 2. Security Shift inspections were modified to included asking officers if they have any concerns. (i)
 3. Increased number of Random hourly status checks by SAS. (p)
 4. Memorandum from Wackenhut President regarding Fitness for duty and Fatigue was briefed to all Security Force members. (p,i,c)

- Items being considered in the future
 1. Upgrading exercise equipment in the Security response centers. (p)
 2. Present NEI Shift briefing material on Attentiveness to Duty and Reporting Requirements. (Currently in process). (p,i)

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?

RESPONSE

All employees and contractors with unescorted access authorization to Callaway Plant are required to adhere to all site 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 at the station. AmerenUE utilizes Quality Assurance audits of the Corrective Action Program, Self Assessments of the Employee Concerns program, and Bi-annual Safety Culture surveys (Synergy) 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 the station's Corrective Action Program and incorporated into the station's business plans. Several actions are being pursued in the near future to increase the visibility of the Employee Concerns Program. In addition, a Self Assessment of Callaway's Safety Conscious Work Environment was conducted in January, 2008 to determine any programmatic or cultural weaknesses. Callaway's Employee Concerns Program is actively benchmarking other nuclear and non-nuclear facilities to improve product quality and effectiveness in these areas.

It is AmerenUE policy that retaliation of any kind for reporting of any concern, including a security issue, will not be tolerated. Policy 17, Safety Conscious Work Environment, establishes the Chief Nuclear Officer's expectations regarding the airing of concerns, and is articulated at all levels of the organization through administrative procedures, General Employee Training, First Line Supervisor training, site communications and postings, and face to face briefings with the plant staff. Additionally, AmerenUE senior leadership conducts periodic "2C's" (Compliments and Concerns) meetings on site to provide a forum for raising and resolving issues. It is the expectation that concerns raised through the chain of command be elevated according to their significance to plant safety. The managers and department heads hold daily corrective action review meetings and plan of the day meetings, as well as monthly Management Review Meetings, where issues affecting safety and quality are discussed. AmerenUE has provided several anonymous means of raising concerns, specifically through the use of anonymous Corrective Action Program requests and through the confidential Employee Concerns Program hotline, both of which are designed to preclude retaliation.

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?

RESPONSE

The Callaway Behavior Observation Program (BOP), Employee Concerns Program and Corrective Action Program all work together to encourage personnel to identify any issues or concerns that could impact the safety or security of Callaway Plant. Use of these programs is a stated expectation and responsibility of all persons with Unescorted Access. Concerns can be identified through multiple methods including:

- Anonymous Callaway Action Requests (CARS)
- Personal and confidential interviews with the Medical Review Officer, Access Authorization Supervisor or other Callaway Plant Management
- Employee Concerns Hotline
- Employee Concerns Coordinator walk-in or scheduled interview, on or offsite, during normal or off-normal working hours
- Email
- Submission of an Employee Concerns Disclosure Statement; can be done anonymously by site or U.S. mail

AmerenUE provides initial training on the importance of Safety Conscious Work Environment (SCWE) and BOP programs in Plant Access Training. Plant Access Training provides the expectation of AmerenUE Management that it is the responsibility of all persons to report behavior observation concerns or safety concerns. The importance is reinforced through continuing training and communications from AmerenUE management to all individuals. A review of every objective within the Behavior Observation Training is performed on an annual re-qualification cycle to ensure that persons are familiar with the program requirements. Site newsletters provide updated information and operating experience regarding the Employee Concerns Program and the Behavior Observation Program in between training cycles. Periodic briefs regarding the Behavior Observation Program, Safety Conscious Work Environment and 10 CFR 50.5 requirements are presented by the Employee Concerns Coordinator to Security Personnel. AmerenUE Management personnel are required to attend training regarding SCWE as part of their supervisor certification process. The qualification process for Shift Managers includes a personal interview with the Superintendent, Protective Services regarding his or her responsibility in relationship to the Behavior Observation Program.

AmerenUE oversight of SCWE and BOP programs is provided by review of audits, surveillances, NRC inspections, corrective action documents, human performance observations, and safety conscious work environment surveys. AmerenUE conducts an internal "Values Pulse Questionnaire" culture survey annually and conducts an industry

standard "Synergy" safety culture survey with nuclear division personnel every other year. Additionally, the Quality Assurance Department conducts frequent audits of Safety Conscious Work Environment to identify possible weaknesses and the operating line departments conduct regular self assessments of the Employee Concerns Program, Safety Conscious Work Environment, and Safety Culture in general. The last self assessment in these areas was concluded February, 2008, and future assessments are scheduled on a long term assessment plan.

Supervisory engagement in the SCWE and BOP programs is evidenced by management directed for-cause drug and alcohol testing, post accident testing, psychological evaluations, EAP referrals, and MRO evaluations. Supervisors routinely confer with Access Authorization and Employee Concerns regarding potential concerns or behavior issues. In addition, union stewards and other employees and contractors confer with the Medical Review Officer, Access Authorization or the Employee Concerns Coordinator regarding behavioral or other concerns regarding co-workers or management. These concerns are investigated thoroughly.

Callaway Plant programs encourage submission of Callaway Action Requests (CARs) to document any type of concern. This program includes the ability to submit concerns anonymously on paper forms with drop boxes available for submission or mailed to the Corrective Action group. Callaway had 29 anonymous CARs submitted in 2007. No attempt is made to ascertain the source of the concern; only resolution is pursued. The Employee Concerns Program also has a hotline available that can be accessed both internal and external to the plant site, as well as a form that can be submitted to document the concern anonymously. Employee Concerns Program and the Employee Assistance Program both have brochures available in multiple locations with hotline numbers included as well as descriptions of the programs.

Callaway has generated a Training Request to include complicity or circumvention of the Behavior Observation Program or other programs in the definition of an employee concern and incorporate operating experience regarding this situation into Plant Access Training. (TRRQ 200800997)

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.**

RESPONSE

Security Program

AmerenUE conducted one audit and three surveillances of the Security program including evaluation of compliance to the Security Working Hours limitations. No significant issues were identified that would adversely affect Callaway Plant security and no adverse trends were found in administration of Security working hour limitations. An adverse trend was identified in the quality and accuracy of procedures, post instructions and documentation. Department focus on attention to detail and review and standardization of documentation has promoted improvement in this area. Adverse conditions were documented and resolved in the Corrective Action Program process.

Corrective Action Program (CAP)

Two self assessments and one audit were conducted on the Corrective Action Program. These evaluations found that the overall effectiveness of the Corrective Action Program have improved since the last audit. This improvement was seen in quality of responses, timely closure of issues, and increased engagement by AmerenUE Management. Effective resolution, effective monitoring and effectiveness reviews were documented areas of the CAP needing improvement. In addition, it was identified that all departments had not yet internalized corrective action as a core business. Senior Management has increased their monitoring and oversight of the quality and timeliness of issue closure and improvement has been achieved in these areas.

Safety Conscious Work Environment (SCWE)

The last Synergy survey for Callaway Plant was performed in March, 2007 and the results rated Callaway's Safety Conscious Work Environment in the "Very Good to Excellent" category. Two internal reviews were conducted by Quality Assurance on the nuclear safety culture and the results of the Synergy Survey. These reviews indicated that people felt that they could voice their opinion on issues, however further visible actions were needed. In addition, this review indicated that more education was needed regarding the Employee Concerns Program. Those interviewed indicated that they would make the supervisors aware of issues and would document concerns. AmerenUE recently commissioned an independent review team to conduct an assessment of Safety Conscious Work Environment which concluded on February 1, 2008, and found that

people at all levels of the organization felt free to raise safety concerns without fear of retaliation, with only a very few exceptions noted. The independent assessment team made a number of recommendations which have been entered into the station's corrective action program for further evaluation and implementation. (CAR 200800944)

Access Authorization and Fitness for Duty, Behavior Observation Program (AA/FFD/BOP)

Four audits were conducted in these areas focusing on procedure and regulatory compliance, FFD policy statement, arrest reporting and the Behavior Observation Program. Audits were conducted both in 2006 and 2007 that included interviews with managers, supervisors and plant personnel regarding their knowledge and roles and responsibilities under the BOP. These interviews indicated that personnel had a good understanding of their roles and responsibilities and felt they were given adequate training to recognize aberrant behavior. The need for several procedure and policy modifications was identified, as well as enhancements to callout actions regarding consumption of alcohol. A change was also recommended regarding tracking of behavior observation supervisor assignments. Adverse conditions regarding procedure or policy issues were documented and resolved through the corrective action program process.

A surveillance was recently performed by Quality Assurance to review audits and surveillances of Security, CAP, SCWE and AA/FFD/BOP over the past two years and look for any adverse trends that may indicate problems relative to complicity, inattentiveness or the resistance to report concerns. No concerns were identified during this review.

QUESTION 5

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

RESPONSE

AmerenUE does not differentiate between licensee employees and contractors or subcontractors in implementation of the Access Authorization, Fitness for Duty, Behavior Observation, or the Safety Conscious Work Environment program.

AmerenUE requires that all contractors and subcontractors granted unescorted access authorization adhere to all site policies and procedures regarding these programs.

AmerenUE assesses the effectiveness of its oversight of contractors and subcontractors by documented observations, use of the Corrective Action Program (CARS), QA surveillances and routine interaction by all levels of AmerenUE management with our contractor staff.

Within the past two years, AmerenUE has strengthened the contractor oversight and qualification program including the addition of assigned Supplemental Personnel Coordinators for each individual brought on site. These coordinators are responsible to identify required qualifications, training and are also responsible for coordination of the contractor's activities on site. Quality Assurance conducted six surveillances of the Supplemental Personnel Process during this period and found that significant improvements had been made. This process continues to be refined by AmerenUE in cooperation with our contractor workforce.

Contractor employees are an integral part of the Callaway Staff and are included in work briefings, recognition and plant celebrations, safety meetings, refuel business unit meetings and alignment meetings. In addition, site utility personnel meet regularly with local building trades leaders who provide most of our contractor labor to promote better understanding of our programs.

Engagement of site personnel in the Observation Program and Corrective Action Program is evidenced by the numbers of documents generated in 2007. In 2007, 3090 observations were documented in the Callaway Coaching Application by the Security Department personnel. 2630 observations were documented on the performance of the Security Department. Observations are routinely performed and documented by personnel outside the observed department at Callaway.

In 2007, 229 Callaway Action Requests (CARS) were assigned to Security personnel for resolution. Approximately 261 CARS were initiated by Security personnel. There are no barriers to initiating CARS across the organizational structure, and it is routinely done.

ULNRC-05472

Enclosure 1

Page 13 of 13

In 2007, 243 CARS were generated by non-AmerenUE site personnel.