June 30, 2008

Mr. M. R. Blevins
Executive Vice President
& Chief Nuclear Officer
Luminant Generation Company LLC
Attn. Regulatory Affairs Department
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO RESPONSE TO NRC BULLETIN 2007-01, "SECURITY OFFICER ATTENTIVENESS" (TAC NOS. MD7586 AND MD7587)

Dear Mr. Blevins:

By letter dated February 11, 2008, Luminant Generation Company LLC (the licensee) submitted the required written response to U.S. Nuclear Regulatory Commission (NRC) Bulletin 2007-01, "Security Officer Attentiveness," for the Comanche Peak Steam Electric Station, Units 1 and 2. The response was submitted to the NRC in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) and 10 CFR 70.22(d).

The NRC staff has reviewed your submittal and determined that additional information is required to complete the final staff assessment of the licensee response to NRC Bulletin 2007-01. NRC Bulletin 2007-01 requested licensees to provide information regarding administrative and managerial programs and controls established to prevent, identify, and correct 1) security personnel inattentiveness and complicity, and 2) failures to implement the behavioral observation program for licensee security personnel including security contractors and subcontractors. The staff will use the additional information received to inform the Commission and to determine if further regulatory action is warranted or if additional assessment of licensee program implementation is needed.

The specific information requested is addressed in the enclosure to this letter. Responses are requested within 35 days of the issuance of this letter. Before submitting responses to the NRC, licensees must evaluate them for proprietary, sensitive, safeguards, or classified information and mark such information appropriately.

If you have any questions, please contact me at 301-415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
Request for Additional Information

cc w/encl: See next page

If you have any questions, please contact me at 301-415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

RELATED TO RESPONSE TO NRC BULLETIN 2007-01,

"SECURITY OFFICER ATTENTIVENESS"

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

In responding to each of the following questions, the licensee should provide information that addresses measures that are currently in place, and any additional planned actions with expected completion dates.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed your response to Question 1b. and requests the following additional information:

1. Describe any licensee processes or programs that are in place to identify problems in climate-controlled security areas. What methods are used to track, inspect, and ensure timely repairs are completed?

Include the following information in your response:

A description of how the security areas are maintained including, but not limited to: (1) a discussion of the maintenance and/or preventive maintenance process and programs in place for these security areas including an overview and brief discussion on routine inspection schedules by maintenance personnel; (2) a discussion on the process a security officer can follow to report concerns with the upkeep and maintenance of his or her post; and (3) a discussion on the timeliness of repairs and any follow-up actions taken by the licensee to ensure the repairs are completed and resolved adequately.

The NRC staff reviewed your response to Question 1c. and requests the following additional information:

2. What is the level of involvement from management who do not have direct responsibility for the security program (including executive and corporate management) in conducting behavior observations of security personnel?

Include the following information in your response:

A description of any processes in place for licensee and/or contract management who work day-to-day at the site or visit the site on a routine basis from a corporate office or other applicable offsite location, for conducting behavior observations of security personnel while on duty at their assigned posts. Examples should include, but are not limited to, a discussion of random or scheduled observations conducted by licensee and/or contract management such as the Plant Operations Shift Managers or other Plant Operations Shift Supervisors, Plant Maintenance Supervisors (licensee and contractor), or Quality Assurance Supervisor, etc. The discussion should include whether these random or scheduled observations are proceduralized and the required or recommended level of licensee and/or contract management involvement.

ENCLOSURE

The NRC staff reviewed your response to Question 1 and requests the following additional information:

3. Are security personnel provided opportunities to participate in any personnel surveys regarding the work environment? If so, what is the frequency of the surveys, the average participation rate of security personnel as compared to the general site average, and the process for providing feedback and addressing the results from the survey?

4. How is the licensee's policy regarding site employee attentiveness and/or inattentiveness communicated to personnel, both licensee and contractor, and at what frequency?

The NRC staff reviewed your response to Question 2 and requests the following additional information:

5. Describe the process for employees to file reports through the site corrective action program (CAP). Can employees file CAP reports without prior supervisory/management review or approval?

Include the following information in your response:

Describe the process for employees to file reports through the CAP. Discuss the supervisor/management review and/or approval process including, but not limited to: (1) does a supervisor/manager have the authority to reject a report before entering it into the CAP without additional management review and approval; and (2) does a supervisor/manager have the authority to modify the report before such report has been entered into the CAP?

6. Can the employees view the status and disposition of reports directly, or must this information be requested? If yes, please describe the process.

The NRC staff reviewed your response to Question 4 and requests the following additional information:

7. Are formal assessments of the security program conducted by organizations/ individuals that do not have direct responsibility for the security program? If so, provide information on the process, including, but not limited to, the organizations and levels of management involved, the frequency of such activities, and any tracking of how findings are resolved.

8. How are self-assessment findings and relevant operating experience information communicated to the security force? Describe those processes including, but not limited to, information such as the criteria by which such information is identified, the frequency of such communications, the responsible department(s) or position(s) for such communications, and the recipients of such communications.

Include the following information in your response:

Describe the process including, but not limited to: (1) formal or informal communication methods; (2) procedures that ensure availability of the policy to staff; and (3) training opportunities for staff to read and understand the policy.

The NRC staff reviewed your response to Question 5 and requests the following additional information:

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

Include the following information in your response:

Describe the licensee's program for oversight of contractors and subcontractors including, but not limited to: (1) a brief overview and description of licensee's procedures that describe the oversight process; (2) a detailed list (bulleted is preferred) of assigned duties for the licensee supervisor(s) or manager(s) responsible for overseeing contractors and subcontractors at the site; (3) a detailed list (bulleted is preferred) of the assigned duties for the contractor and subcontractor supervisor(s) or manager(s) responsible for overseeing the contractor and subcontractor staff at the site; and (4) a brief discussion of the corporate (management) involvement with the oversight of contractors and subcontractors at the site.