

July 9, 2008

Mr. John T. Carlin
Vice President R.E. Ginna Nuclear Power Plant
R.E. Ginna Nuclear Power Plant, LLC
1503 Lake Road
Ontario, NY 14519

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL
INFORMATION RE: BULLETIN 2007-01 "SECURITY OFFICER
ATTENTIVENESS" (TAC NO. MD7603)

Dear Mr. Carlin:

By letter dated February 11, 2008, the R.E. Ginna Nuclear Power Plant, Inc. (the licensee) submitted the required written response to Nuclear Regulatory Commission (NRC) Bulletin 2007-01 "Security Officer Attentiveness" for the R.E. Ginna Nuclear Power Plant. 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 has determined that additional information is needed to complete the final staff assessment of the licensee response. Bulletin 2007-01 requested licensees to provide information regarding administrative and managerial programs and controls established to prevent, identify and correct security personnel inattentiveness, complicity, and failures to implement the behavioral observation program by individuals among 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 301-415-1364.

Sincerely,

/RA/

Douglas V. Pickett, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure:
Request for Additional Information

cc w/encl: See next page

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Douglas V. Pickett, Senior Project Manager
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R.E. Ginna Nuclear Power Plant

cc:

Mr. Michael J. Wallace, Vice-Chairman
Constellation Energy
100 Constellation Way, Suite 1800P
Baltimore, MD 21202

Mr. Henry B. Barron, President, CEO &
Chief Nuclear Officer
Constellation Energy Nuclear Group, LLC
100 Constellation Way, Suite 200C
Baltimore, MD 21202

Kenneth Kolaczyk, Sr. Resident Inspector
R.E. Ginna Nuclear Power Plant
U.S. Nuclear Regulatory Commission
1503 Lake Road
Ontario, NY 14519

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. John P. Spath
New York State Energy, Research,
and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Mr. Paul Tonko
President and CEO
New York State Energy, Research, and
Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Mr. Carey W. Fleming, Esquire
Senior Counsel - Nuclear Generation
Constellation Energy Nuclear Group, LLC
100 Constellation Way, Suite 1700P
Baltimore, MD 21202

Mr. Charles Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271

Mr. George Bastedo, Director
Wayne County Emergency Management
Office
Wayne County Emergency Operations
Center
7336 Route 31
Lyons, NY 14489

Ms. Mary Louise Meisenzahl
Administrator, Monroe County
Office of Emergency Preparedness
1190 Scottsville Road, Suite 200
Rochester, NY 14624

Mr. Paul Eddy
New York State Department of
Public Service
3 Empire State Plaza, 10th Floor
Albany, NY 12223

Mr. David F. Wilson
Director, Licensing
R.E. Ginna Nuclear Power Plant
1503 Lake Road
Ontario, NY 14519

Mr. Gary L. Detter
Manager – Nuclear Safety and Security
Constellation Energy Nuclear Group, LLC
100 Constellation Way, Suite 200C
Baltimore, MD 21202

REQUEST FOR ADDITIONAL INFORMATION

REVIEW OF BULLETIN RESPONSES

SUBMITTED IN RESPONSE TO NRC BULLETIN 2007-01

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

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

1. Describe the process for security post rotations including the rotation process for isolated positions.

Include the following information in your response:

A description of the security post rotation process including, but not limited to: (1) a discussion of the types of posts a typical security officer would rotate through during a normal shift; (2) a discussion on whether the type of activity (i.e. roving or foot patrol or stationary in a Bullet Resisting Enclosure [BRE]) performed at each individual post is taken into consideration when a security officer moves from post-to-post throughout the shift; and, (3) the length of time at each post. When responding, particular emphasis should be placed on whether the licensee takes into consideration the activities associated with each post assignment when formulating their post rotation schedules for each shift (i.e., rotating from foot patrol to BRE to Vital Area patrol or rotating from BRE to ready room to BRE, etc.).

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

2. 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 up-keep 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 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 corrective action program 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 licensees' 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) include 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) include 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.