



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

July 15, 2008

CAL 1-07-005

Mr. Charles G. Pardee
Chief Nuclear Officer (CNO) and Senior Vice President
Exelon Generation Company, LLC
Chief Nuclear Officer (CNO)
AmerGen Energy Company, LLC
200 Exelon Way
Kennett Square, PA 19348

**SUBJECT: PEACH BOTTOM ATOMIC POWER STATION CONFIRMATORY ACTION
LETTER STATUS INSPECTION REPORT NOS. 05000277/2008008 and
05000278/2008008**

Dear Mr. Pardee:

On June 6, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection, at your Peach Bottom Atomic Power Station (PBAPS) Units 2 and 3, to determine your progress in meeting the commitments documented in the Confirmatory Action Letter (CAL) dated October 19, 2007. The CAL had been issued to formalize Exelon's agreement to complete certain actions in response to the inattentive security officers and safety conscious work environment (SCWE) issues at PBAPS. The enclosed inspection report documents the inspection results, which were discussed on June 6, 2008, with Mr. J. Grimes, Site Vice President, and other members of your staff.

Since the completion of the Augmented Inspection Teams (September 21 through 28, 2007 and November 5 through 9, 2007) were conducted and the PBAPS CAL was issued, the NRC has devoted extensive efforts to monitor your actions in response to the inattentive security officers and safety conscious work environment (SCWE) issues at PBAPS. Specific activities conducted included: inspection of the transition from contract security force to in-house security force (February 11-15, 2008); review of your root cause evaluation effectiveness (March 3-7, 2008); and an inspection of activities directly related to safety conscious work environment (March 24 – 28, 2008). These prior inspection activities also verified Exelon's actions taken to address various CAL commitments.

The CAL status inspection team focused on actions taken by Exelon as specified in the CAL to determine whether such actions were timely, complete and effective. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified and the enclosed inspection report closes all but two CAL items. One CAL item related to Exelon's commitment to perform security organization SCWE surveys across the Exelon fleet remains

open. As noted in the CAL, the NRC will schedule a meeting with Exelon upon the completion of your review for this action to discuss the safety conscious work environment (SCWE) survey results as they apply to other Exelon sites. The second CAL item related to Exelon submitting written confirmation that all CAL items have been completed, remains open.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA by Fred L Bower Acting For/

Paul G. Krohn, Chief
Projects Branch 4
Division of Reactor Projects

Docket Nos. 50-277, 50-278
License Nos. DPR-44, DPR-56

Enclosure: Inspection Report Nos. 05000277/2008008, 05000278/2008008
w/Attachments

Attachments:
(A) Supplemental Information
(B) Peach Bottom Cal Commitment Table

cc w/encl:

C. Crane, Executive Vice President, Exelon, Chief Operating Officer, Exelon Generation
M. Pacilio, Chief Operating Officer, Exelon
W. Maguire, Site Vice President, Peach Bottom
R. DeGregorio, Senior Vice President, Mid-Atlantic
R. Hovey, Senior Vice President, Nuclear Oversight
G. Stathes, Acting Plant Manager, Peach Bottom
J. Armstrong, Regulatory Assurance Manager, Peach Bottom
J. Bardurski, Manager, Financial Control & Co-Owner Affairs
B. Franssen, Acting Director, Operations
P. Cowan, Director, Licensing
K. Jury, Vice President, Licensing and Regulatory Affairs
J. Bradley Fewell, Associate General Counsel, Exelon
T. Wasong, Director, Training
Correspondence Control Desk
D. Allard, Bureau of Radiation Protection, PA Department of Environmental Protection
S. Gray, Power Plant and Environmental Review Division (MD)
S. Pattison, Secretary, MD Department of the Environment
A. Lauland, Director, Homeland Security Advisor
M. Griffen, MD Department of Environment
Public Service Commission of Maryland, Engineering Division
Board of Supervisors, Peach Bottom Township
B. O'Connor, Council Administrator of Harford County Council
R. Ayers, Deputy Mgr, Harford County Div of Emergency Operations
E. Crist, Harford County Div of Emergency Operations
S. Ayers, Emergency Planner, Harford County Div of Emergency Operations
R. Brooks, Cecil County Dept of Emergency Services
Mr & Mrs Dennis Hiebert, Peach Bottom Alliance
E. Epstein, TMI - Alert
J. Johnsrud, National Energy Committee, Sierra Club
Mr. & Mrs. Kip Adams
R. Fletcher, Dir, MD Environmental Program Manager, Radiological Health Program
J. Powers, Director, PA Office of Homeland Security
R. French, Dir, PA Emergency Management Agency
D. Lockbaum, Union of Concerned Scientists

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 Paul G. Krohn, Chief
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DATE	07/ 10/08 via phone	07/10/08		07/10 /08 via phone	07/ 14/08		

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket Nos: 50-277, 50-278

License Nos: DPR-44, DPR-56

Report Nos: 05000277/2008008, 05000278/2008008

Licensee: Exelon Generation Company, LLC

Facility: Peach Bottom Atomic Power Station

Location: Delta, Pennsylvania

Dates: June 2 – June 6, 2008

Team Leader: Anthony Dimitriadis, Senior Physical Security Inspector (Region I)

Inspectors: George E. Smith, Physical Security Inspector (Region I)
Thomas Setzer, Reactor Inspector (Region I)
Mark Martin, Physical Security Inspector, (Region III)

Approved by: Paul Krohn, Chief
Reactor Projects Branch 4
Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000277/2008008 and 05000278/2008008; 06/02/2008 – 06/06/2008; Peach Bottom Atomic Power Station; Confirmatory Action Letter Status Report

Identification of Resolution of Problems – Confirmatory Action Letter Status Inspection

This report covers an announced team inspection by two Region I security inspectors, one Region I reactor inspector, and one Region III security inspector. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, December 2006.

A. NRC Identified and Self Revealing Finding

None

B. Licensee Identified Findings

None

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution – Confirmatory Action Letter and SCWE (IP 92702)

Background

On September 10, 2007, representatives of WCBS-TV (New York City) contacted the NRC stating that they possessed videotapes of inattentive security officers at the Peach Bottom Atomic Power Station (PBAPS). Based upon this information, the NRC enhanced inspection oversight of security activities at Peach Bottom and verbally informed Exelon management who commenced an internal investigation. On September 19, 2007, the NRC viewed the video of inattentive security officers and immediately initiated an Augmented Inspection Team (AIT) to investigate this issue. The AIT concluded that Exelon's prompt compensatory measures and corrective actions in response to the inattentive security officers were adequate and ensured the station's ability to meet Security Plan requirements. On October 4, 2007, Exelon documented their prompt compensatory measures and planned corrective actions in a letter to the NRC (NRC ADAMS Accession Number ML072850708).

In Exelon's October 4, 2007, letter to the NRC Region I Regional Administrator, Exelon described completed compensatory actions and 16 planned actions to address the inattentive security officer issue. The planned actions included, in part: (1) terminating the security contract with their contractor and transitioning to a proprietary security force; (2) completing a root cause analysis of the security officer inattentiveness; (3) identifying corrective actions; and (4) performing safety conscious work environment (SCWE) surveys of the Peach Bottom Security organization. On October 19, 2007, the NRC issued a Confirmatory Action Letter (CAL) (ML072920283) to document Exelon's commitments. The CAL included the commitments documented in Exelon's letter and added several additional Exelon commitments that were verbally made to the NRC. The commitments are listed in Attachment B of this report.

On June 2 - 6, 2008, the NRC conducted a team inspection to verify whether the actions taken by Exelon adequately addressed the commitments documented in the CAL. This inspection was conducted in accordance with a deviation from the Reactor Oversight Program as authorized by the NRC Executive Director of Operations (ML073320344). The results of this inspection are documented in this report.

.1 Random Observations of Various Aspects of the Security Program (Attachment B, Item 1) (IP 92702)

Inspection Scope

Exelon committed to conducting five observations in a 24 hour period, seven days per week, by Exelon Corporate Security and security management personnel from other sites. Random observations included verifying attentiveness at security ready rooms and other posts. The inspectors reviewed PBAPS records of Exelon Corporate daily random security program observations performed until November 18, 2007, to determine whether observations were conducted and whether any adverse trends were identified

or documented. The inspectors performed interviews of security department management to better understand Exelon's programs and processes for identifying issues related to inattentiveness, behavior observation, and SCWE. Additionally, the inspectors conducted 63 interviews with security officers to determine their understanding of making proper notifications to station management upon discovery of an inattentive officer, aberrant behavior, and recognition of behaviors adverse to the safe operation and security of the facility.

Findings and Observations

No findings of significance were identified. This CAL item is closed.

The inspectors reviewed Exelon's letter (ML073040516) to the NRC dated October 25, 2007 and the NRC's response to this letter (ML073370024) dated November 30, 2007. The letters were regarding a missed observation on October 20, 2007. The inspectors concluded that this one missed observation by corporate security management was of minor significance and did not impact the overall implementation of this commitment.

With the exception of the item noted above, the inspectors determined that the daily random security program observations were all completed in accordance with the CAL. Interviews with security operations staff identified an effective level of understanding and ownership of the importance of attentiveness. Inspector-led interviews conducted with selected officers and staff confirmed that security personnel were knowledgeable of behaviors adverse to attentiveness. Observations of post assignment areas revealed that security posts, ready rooms, and alarm stations were orderly, properly lit, well ventilated, and fully functional. Furthermore, the security officers conveyed a fundamental understanding of the importance of prompt communication with management regarding behavior observation.

.2 Daily Observations of Various Security Posts (Attachment B, Item 2)

Inspection Scope

Exelon committed to conduct and document daily management observations of various security posts chosen at random. Additionally, site management committed to visit the ready room at least once per day, 7 days per week, including at least one backshift visit per week until November 20, 2007. The inspectors performed numerous walk-downs of all security posts, ready rooms and alarm stations. The inspectors examined records of daily observations of various security posts from October 18, 2007, through November 20, 2007. The inspectors performed observations, interviewed individuals, and verified records to ensure that the observations were effectively conducted and documented.

Findings and Observations

No findings of significance were identified. This CAL item is closed.

The inspectors verified that Exelon site management had performed all actions detailed in the CAL.

.3 Alarm Station and Shift Turnover Observations (Attachment B, Item 3)

Exelon committed to conducting observations of the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS), as well as one security shift turnover per month by the Peach Bottom Site Vice President and the Plant Manager until March 2008. The inspectors reviewed records from October 19, 2007, through May 29, 2008, and performed interviews with the Plant Manager and Site Vice President to determine if the observations of the CAS, SAS, and shift turnovers were effective. The inspectors performed walk-downs of the CAS and SAS, interviewed seven alarm station operators, and several security officers to determine if the observations made by the Site Vice President and/or Plant Manager provided reinforcement of expectations related to attentiveness.

Findings and Observations

No findings of significance were identified. This CAL item is closed.

The inspectors verified that Site Vice President and Plant Manager had performed all actions detailed in the CAL. The results of interviews with CAS and SAS operators indicated a strong understanding of management's expectations of attentiveness and proper timely reporting of such issues to management.

.4 Wackenhut Corporate Security Management Oversight and Observations

Inspection Scope (Attachment B, Item 4)

The inspectors verified through a review of plant records that: (a) Wackenhut corporate security management had provided 24 hour supervisory coverage of security activities at the plant through the transition to an Exelon proprietary security force; (b) Wackenhut provided site security management oversight above normal staffing to the day and night shifts; (c) Wackenhut supervisors had performed continuous observation in the ready room; and (d) Wackenhut security personnel conducted random radio checks.

Findings and Observations

No findings of significance were identified. This CAL item is closed.

The inspectors verified that Wackenhut had performed all actions detailed in the CAL.

.5 Exelon to Provide the NRC information Regarding the Management Transition of the Exelon Security Program (Attachment B, Item 5)

Inspection Scope

The inspectors reviewed Exelon's project plan and related actions for transitioning to an Exelon managed security force. The inspectors reviewed records detailing weekly telephone call updates to Region I management on the status and changes to the security force transition plan.

Findings and Observations

No findings of significance were identified. This CAL item is closed.

The inspectors confirmed that Region I management participated in numerous weekly telephone calls and discussed the status and relevant details of the transition to an Exelon managed security organization.

.6 Sixteen Commitments in an Exelon Letter Dated October 4, 2007 (Attachment B, Items 6a through 6p)

Inspection Scope

The inspectors verified that Exelon had completed a root cause evaluation (IR 673505) and identified corrective actions to address the inattentive security officer issue (Attachment B, Item 6a). The inspectors reviewed post inspection forms, vital area patrol records and post activity logs for all assigned posts and locations from October 4, 2007, through June 2, 2008, to verify that security officers were not assigned to a single post for an entire shift (Item 6b). The inspectors reviewed fleet corrective actions to ensure post rotations had been reviewed at the remaining Exelon Nuclear operating reactor sites (Item 6d).

The inspectors conducted interviews with officers at security posts to assess the effectiveness of attentiveness stimuli (Item 6c). Additionally, the inspectors verified that attentiveness stimuli projects had been fully implemented or were scheduled to be implemented (Item 6g). The inspectors reviewed the common Exelon procedures to verify that authorized attentiveness aids were described and that their use at each post (Ready Room, Over-watch, etc.) was clearly stated and authorized.

The inspectors confirmed that Exelon has established a new division to manage security organization at Peach Bottom (Item 6h). The inspectors also reviewed condition reports that described incidents which warranted reporting to security management. Specifically, the inspectors focused on incidents where inappropriate behavior was witnessed by security officers on shift and reported to management. The inspectors reviewed documentation of communications to the balance of the Peach Bottom Station staff regarding expectations for reporting issues (Item 6i).

The inspectors conducted interviews and reviewed records to understand Exelon's methods to return security officers to duty following the inattentiveness issue (Item 6e). Corrective action records were reviewed to ensure indoctrination sessions for understanding Behavioral Observation Program (BOP) and SCWE were conducted with all security force members (Item 6f). The inspectors visited posts to verify that structural improvements, lighting enhancements, and temperature controls were conducive to maintaining security officer attentiveness (Item 6j).

The inspectors reviewed training records to verify that refresher training for the Peach Bottom security organization and for the remainder of Exelon Nuclear reactor sites had been implemented (Item 6k). The inspectors verified that lesson plans stressed expectations regarding the BOP, SCWE, and maintaining attentiveness while on duty.

The inspectors verified that face-to-face interviews were conducted with security force supervisors to reinforce expectations related to attentiveness and actions to take if someone is found in an inattentive state, and to solicit feedback on challenges to maintaining attentiveness and raising issues (Item 6l). The inspectors also verified that

supervisory training was conducted for security force supervisors regarding their responsibilities for maintaining a SCWE (Item 6m).

The inspectors verified that a SCWE survey of the Peach Bottom security organization by an external vendor had been conducted (Item 6n). The inspectors verified that the results of the SCWE survey were evaluated by Exelon and were the basis of a focused self assessment (Item 6o). The inspectors also reviewed Exelon's plans for conducting SCWE surveys of the security organizations at other Exelon sites (Item 6p). As noted in the CAL, the NRC will schedule a meeting with Exelon upon the completion of their review for this action to discuss the safety conscious work environment (SCWE) survey results as they apply to other Exelon sites.

Findings and Observations

No findings of significance were identified. The CAL Items 6a through 6o are closed. The CAL item 6p, for conducting SCWE surveys of the security organizations at other Exelon sites, remains open. Exelon has corrective actions assigned to track completion of these surveys. All surveys are expected to be completed by October 2008.

Exelon created an in-house proprietary security division to manage the security organization at Peach Bottom. The inspectors reviewed procedures and records to ensure no security officer had been assigned to a single post for an entire shift. Steps had been taken in the post assignments to ensure that the officers' duties provide for a change in location, variety of responsibilities, and appropriate breaks to prevent inattentiveness.

Exelon conducted face to face interviews with security force supervisors to reinforce expectations related to inattentiveness; actions to be taken if someone was found to be inattentive; and, the mechanism to solicit feedback on challenges to maintaining attentiveness. Exelon included topics such as behavioral observation training, security officer attentiveness, aberrant behavior identification, and notification expectations and requirements in these interviews. The inspectors determined that communications to reinforce expectations of reporting issues for the balance of the Peach Bottom staff were complete.

The inspectors concluded that the security staff had a sound understanding of Exelon management's expectations of reporting unusual behavior or actions that could indirectly pose a risk to public health and safety. Specifically, the inspectors noted that the security staff was willing to report operational and safety issues at a low threshold. The officers were fully cognizant of communicating early and clearly with management regarding BOP, SCWE, and inattentiveness.

.7 Exelon Will Provide Written Confirmation to the NRC When These Actions Are Completed (Attachment B, Item 7)

The inspectors verified through interviews that Exelon will provide written confirmation of all CAL items when the remaining SCWE surveys at all Exelon sites have been completed.

Findings and Observations

No findings of significance were identified.

This CAL item remains open.

40A6 Meetings, Including Exit

On June 6, 2008, the inspectors presented the inspection results to Mr. Joseph Grimes, Site Vice President, and other members of his staff.

ATTACHMENT A: SUPPLEMENTAL INFORMATION

ATTACHMENT B: PEACH BOTTOM CAL COMMITMENT TABLE

ATTACHMENT A
SUPPLEMENTAL INFORMATION
KEY POINTS OF CONTACT

Personnel Contacted:

J. Grimes, Site Vice President
M. Massaro, Plant Manager
J. Armstrong, Manager, Regulatory Assurance
R. Smith, Regulatory Assurance Specialist
J. Kovalchick, Manager Site Security
S. Craig, Manager, Site Security Operations
J. Glunt, NOS Manager
K. Young, Security Operations Supervisor
D. Torres, Security Training Coordinator
R. White, Lead Supervisor - Security
S. Berry, Lead Supervisor - Security
T. Girken, Lead Supervisor – Security
K. Bristol, Lead Supervisor - Security

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None

LIST OF DOCUMENTS REVIEWED

Procedures:

SY-AA-101-126-1001, Revision 2, Nuclear Security Team Turnover and Briefing
SY-AA-1016, Revision 5, Watch-Standing Practices
SY-AA-1016, Revision 6, Watch-Standing Practices and Communications
SY-AA-1020, Revision 4, Supervisor Post Checks and Post Orders
SY-AA-1024, Revision 0, Security Performance Monitoring, Oversight, and Indicators
SY-AA-101-135, Revision 3, Exelon Nuclear Security Work Hour Controls
SY-PB-101-124-1001, Revision 4, Security Control Center Operations
SY-AA-101-126-1001, Revision 2, Nuclear Security Team Turnover and Briefing
SY-AA-101-126-1002, Revision 1, Security Team Management Review Meeting (MRM)
SY-AA-500-126-1001, Revision 0, Security Improvement Focus Team
LS-AA-125, Revision 11, Corrective Action Program (CAP) Procedure
HU-PB-2000, Revision 2, Attentiveness Guidelines
SY-AA-500-126, Revision 3, Duties and Responsibilities of the Exelon Nuclear Security Organization
DD-13, Revision 2, Security Department Description
NO-AA-101-1005, Revision 1, Qualification of Employee Concerns Personnel
EI-AA-101-1001, Revision 7, Employee Concerns Program Process
OP-PB-101-111, Revision 8, Peach Bottom Operations Department
LS-AA-112, Revision 3, Responding to Allegations Referred by NRC and to NRC Investigations
LS-AA-126-1006, Revision 2, Benchmarking Program

WC-AA-106, Revision 7, Work Screening and Processing

Miscellaneous:

CAL No. 1-07-005, Letter to Christopher Crane, President and Chief Nuclear Officer, Exelon Nuclear, "Confirmatory Action Letter (1-07-005)," October 19, 2007, ML072920283.

Letter to Samuel Collins, Regional Administrator, NRC, "Exelon Letters Regarding Alleged Security Officer Inattentiveness at Peach Bottom Atomic Power Station," October 9, 2007, ML072900343.

Station Security Observation Forms, September 19, 2007, through November 18, 2007. N-AN-SY-SUPVECPSCWE, "Employee Concerns Program and Safety Conscious Work Environment for Supervisors [training lesson plan]."

Issue Reports:

IR 673505, Security Inattentiveness Allegation

IR 674907, NER NC-07-034 Red – Inattentive Security Officer Actions

IR 682545, Track Action from Letter to NRC dated October 4, 2007

IR 688313, Track Actions from Confirmatory Action Letter 1-07-005

IR 707182, Security Post Rotation Differences

IR 707952, NER NC-07-034, Revision 3, Inattentive Security Officer Actions

IR 720465, Track Actions from PBAPS Letter to NRC dated November 2, 2007

IR 739665, NER NC-07-034, Revision 4, Actions for Inattentive Security Officer

IR 762432, Trend Issue – Inadvertent Discharge of OC Spray

IR 782379*, Security Root Cause ACIT Improperly Closed

IR 782387, Inappropriate Behavior by Security Officer

IR 782747*, Scaffold Poles Creating Glare/Blockage

IR 783038*, REC: Evaluate Security Turnover Process (Uninterrupted)

* Written as a result of NRC inspection

LIST OF ACRONYMS

ADAMS	Agency-wide Documents Access and Management System
AIT	Augmented Inspection Team
AR	Activity Report
BOP	Behavior Observation Program
CAL	Confirmatory Action Letter
CAP	Corrective Action Program
CARB	Corrective Action Review Board
CAS	Central Alarm Station
CFR	Code of Federal Regulations
CNO	Chief Nuclear Officer
CR	Condition Report
DRP	Division of Reactor Projects
ECP	Employee Concerns Program
EDO	Executive Director for Operations
NRC	Nuclear Regulatory Commission
PARS	Publicly Available Records
PBAPS	Peach Bottom Atomic Power Station
SAS	Secondary Alarm Station
SCWE	Safety Conscious Work Environment
SDP	Significance Determination Process
ROP	Reactor Oversight Process

ATTACHMENT B**PEACH BOTTOM CAL COMMITMENT TABLE**

ITEM NO.	ISSUE
1	Exelon Corporate security management personnel will conduct and document daily random observations of the implementation of various aspects of the security program until November 18, 2007.
2	Exelon site management will conduct and document daily observations of various security posts chosen at random until November 20, 2007.
3	The Peach Bottom Site Vice President and the Plant Manager will observe the Central Alarm Station and Secondary Alarm Station, as well as one security shift turnover per month until March 2008.
4	Until the transition to an Exelon security force is implemented on or about November 1, 2007, Wackenhut management oversight actions of security operations at Peach Bottom.
5	Exelon will provide the NRC information regarding the transition to an Exelon security program and implementing procedures that supersede the above actions, as well as updates on the security force transition plan, via weekly telephone calls until a permanent management observation system is installed.
6	Exelon will complete or maintain all other actions committed to in its October 4, 2007 letter on the schedule listed therein (6a-6p, below).
6a	Complete root cause evaluation and identify subsequent corrective actions.
6b	Revise post assignments for Peach Bottom security so no one is assigned to a single post for entire shift.
6c	Enhance attentiveness stimuli.
6d	Review security post rotation at remaining Exelon plants.
6e	Determine which security force members impacted by the inattentiveness issue will be returned to duty.
6f	Conduct indoctrination sessions with those returning security force members to reinforce expectations regarding behavioral observation program and a healthy safety conscious work environment.
6g	Improvements in attentiveness stimuli have been identified and scheduled for implementation.
6h	Establish new Exelon division or company to manage security organization at Peach Bottom.
6i	Develop appropriate communications for the balance of the Peach Bottom staff to reinforce expectations regarding reporting of issues.

6j	Improve the environmental conditions of the staging areas at Peach Bottom.
6k	Provide refresher training to the security organizations at the remainder of the Exelon Nuclear reactor sites to reinforce expectations regarding the behavioral observation program and a healthy SCWE
6l	Conduct 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 solicit feedback on challenges to maintaining attentiveness and raising issues.
6m	Conduct supervisory training for security force supervisors regarding their responsibilities for maintaining a SCWE.
6n	Conduct a SCWE survey of the Peach Bottom security organization with the assistance of resources external to Exelon.
6o	Perform a self-assessment of the Peach Bottom security organization, with the assistance of resources external to Exelon, focusing on the SCWE in the security organization.
6p	Conduct a SCWE survey of the security organizations at the remaining Exelon Nuclear operating reactor sites to identify any required corrective actions (Not Complete) .
7	Exelon will provide written confirmation to NRC when these actions are completed (Not Complete) .