



444 South 16th Street Mall
Omaha NE 68102-2247

LIC-08-0081
August 11, 2008

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

- References:
1. Docket No. 50-285
 2. NRC Bulletin 2007-01, "Security Officer Attentiveness," dated December 12, 2007 (NRC-07-0133)
 3. Letter from OPPD (M. A. Tesar) to NRC (Document Control Desk), "Omaha Public Power District (OPPD) Response to NRC Bulletin 2007-01," dated February 8, 2008 (LIC-08-0010)
 4. Letter from NRC (M. T. Markley) to OPPD (D. J. Bannister), "Fort Calhoun Station, Unit 1 - Request For Additional Information Related to Response to NRC Bulletin 2007-01, "Security Officer Attentiveness (TAC No. MD7602)," dated July 7, 2008 (NRC-08-0071)

SUBJECT: Omaha Public Power District (OPPD) Response to NRC Request for Additional Information Regarding Bulletin 2007-01

In Reference 2, the NRC requested licensees to provide information regarding programs and controls established to prevent, identify, and correct human performance issues involving security personnel inattentiveness and complicity.

In Reference 3, the Omaha Public Power District (OPPD) provided the requested information for Fort Calhoun Station. Attached please find OPPD's response to the Reference 4 Request for Additional Information (RAI).

This response is submitted under oath or affirmation in accordance with the provisions of 10 CFR 50.54(f).

There are no regulatory commitments contained in this submittal.

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If you have additional questions, or require further information, please contact Mr. Bill Hansher at (402) 533-6894.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 11, 2008.



M. A. Tesar
Division Manager
Nuclear Support Services

MAT/MLE/mle

Attachment: OPPD Response to NRC RAI

c: E. E. Collins, Regional Administrator, Region IV
M. T. Markley, NRC Senior Project Manager
J. D. Hanna, NRC Senior Resident Inspector

**OPPD Response to NRC Request for Additional Information Regarding Bulletin
2007-01, "Security Officer Attentiveness"**

Related to the OPPD response to Question 1b., the U.S. Nuclear Regulatory Commission (NRC) requests the following additional information:

1. Please 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?

Please 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 following is OPPD's Response to Question 1b in Bulletin 2007-01:

Preventive maintenance (PM) on security posts is conducted at 12-week intervals and on security buildings at 8-week intervals under a monthly work order maintained by the Maintenance Department.

Other problems or issues with security posts or climate-controlled equipment in security areas are usually identified and reported by security personnel. Security officers report deficiencies or maintenance issues to the Shift Security Supervisor who generates a condition report (CR). Security officers can also generate a CR themselves if they desire. The CR is automatically routed to the Operations Department for review and then to the Corrective Action Group (CAG) for assignment to the appropriate CR owner. Concurrent with generation of the CR, a work request (WR) is generated for repair of the deficiency.

The WR is processed by the Work Management Department. Problems with heating, ventilation, and air conditioning (HVAC) equipment in security areas are prioritized appropriately. Simple repairs can often be completed within 24 hours. Repairs that require replacement parts may take longer depending on parts availability. If the HVAC system cannot be repaired promptly, temporary heating or air-conditioning units are installed until permanent repairs can be completed.

To ensure these issues receive proper attention, a security system technician attends a daily prioritization meeting with the maintenance crafts. The Shift Security Supervisor can also contact the Work Week Manager for support if necessary. In addition, the Manager-Nuclear Security will request maintenance support during the daily Operational Focus meeting with the Plant Manager and his direct reports. The Security

Department also maintains an informal list of equipment issues to ensure prompt resolution.

Related to the OPPD response to Question 1c., the NRC 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?

Please 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 Supervisors, 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.

The following is OPPD's Response to Question 1c in Bulletin 2007-01:

Each month, Fort Calhoun Station (FCS) Guideline (FCSG)-2 "Observation-Quality Contact Hours Program" requires all managers and supervisors to spend a minimum of 10 hours in the field observing work practices and employee behavior. These supervisory personnel can observe and interact with any work group (including Security) at any time, and reinforce good work practices and coach individuals when personnel safety issues arise or when observed practices do not meet company or industry standards. Each manager and supervisor decides when to conduct the required observations, which may be during business hours or on backshifts and weekends. Observations are recorded and then reviewed by OPPD Management.

Operations Policy Directive (OPD)-2-06, "Operations Department Duties and Responsibilities" requires the Manager – Operations, and the Manager – Shift Operations to conduct routine tours of work in progress to observe work practices and correct deficiencies. OPD-2-06 does not explicitly require the observation of security personnel. However, in conducting these tours, security officer inattentiveness would be apparent and these Managers would respond immediately.

Security Operations audits and Access Authorization audits are conducted by the FCS Quality Assurance (QA) Department, which is independent of the Security Department and Security Program. Security Program audits are scheduled on a biennial basis with

Security Operation Audits and Access Authorization audits performed in alternating years. In non-audit years, QA surveillances are performed in these areas. Audit results are reported to Security Department Management and to FCS Senior Management. Conditions adverse to quality identified during audit and surveillance activities are entered into the FCS Corrective Action Program (CAP) through the initiation of a CR and are reported to the Plant Manager. CRs that are initiated by the QA Department are tracked to satisfactory completion by the QA Department.

Related to the OPPD response to Question 1, the NRC 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 following is OPPD's Response to Question 1 in Bulletin 2007-01:

At FCS, all personnel including contractors participate in an annual Safety Conscious Work Environment (SCWE) survey. The participation rate of Security Department personnel is consistent with other departmental averages as approximately 66% responded to the 2007 survey. The 2007 survey identified an area of improvement for the Security Department involving less than ideal utilization of the avenues available to report concerns. As a result, the Employee Concerns Coordinator briefed Security Department personnel to raise awareness on how to use the CAP and the Employee Concerns Program (ECP). The 2008 survey was recently administered and survey results are not yet available.

SCWE and Behavioral Observation Program (BOP) monitoring is accomplished through periodic assessment of the CAP, observations from the Quality Contact Hours Program (QCHP), observations from Security Department Management, the ECP, and the Access Authorization and Fitness for Duty (FFD) Programs. The effectiveness of these programs is periodically evaluated at FCS through self-assessments, QA audits, SCWE surveys, and Corrective Action Review Board (CARB) reviews. Additionally, independent reviews of selected programs are conducted by the Institute of Nuclear Power Operations, the NRC, and industry peer review teams.

Self-assessments, safety culture surveys, management observations, employee exit interviews, and communication surveys provide indications of the effectiveness of facility programs, policies, procedures, training, and communications in engaging

employees in this requirement. Areas identified for improvement are entered into the FCS CAP as appropriate.

Initial training for all personnel (including contractors) with unescorted access to FCS is provided on the importance of a SCWE and the BOP in General Employee Training (GET). The importance is reinforced through continuing training and communications from management. Annual GET requalification training discusses FFD issues such as fatigue and security officer attentiveness. In early 2008, a required reading was sent to managers and supervisors of personnel with unescorted access to FCS reminding them of the need to promptly report BOP issues such as security officer inattentiveness. In turn, these managers and supervisors briefed their personnel regarding the requirements of the BOP and the need to immediately report lapses in security officer attentiveness.

Managers and supervisors continue to provide BOP oversight during pre-job briefs, shift briefings, staff meetings, and personnel performance evaluations. In addition, Security Department supervisory staff provides additional oversight by performing pre-duty observations of officers at the security weapons vault and by conducting checks of security posts.

FCS personnel have daily interaction with contract personnel; this helps to ensure BOP adherence. Daily interaction with contract personnel takes place through pre-job briefs, pre-shift meetings, meetings with contract job coordinators, and job sight observation.

Results of the 2007 SCWE survey indicate that of those that responded:

- 100% of nuclear workers believe they are responsible for identifying problems and adverse conditions.
- 94% of nuclear workers believe a culture exists at FCS that is conducive to raising nuclear safety and quality concerns.
- 92% of nuclear workers believe they can raise a nuclear safety or quality concern without fear of retaliation.

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

Related to the OPPD response to Question 2, the NRC requests the following additional information:

5. Please 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?

Please 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 following is OPPD's Response to Question 2 (as it relates to RAI #5 and RAI #6) in Bulletin 2007-01:

The ActionWay software that runs the CR system will allow anyone with access to the company intranet to enter a CR. The software allows CRs to be entered anonymously if desired and personnel without computer access can bring the issue to a supervisor, manager, or member of the CAG who will ensure that it is entered into the system. Personnel do not need prior approval or management review to enter a CR. Managers and supervisors do not have the authority or ability to reject a CR written by an individual nor do they have the ability to modify the CR when it is entered. A manager or supervisor may request that the CAG (which manages the CR system), change typographical or grammatical errors, but the CAG will not otherwise change the content of a CR without the permission of the originator.

In order to view the status and disposition of CRs, one must be "enabled" by the ActionWay software. Because there is a 500-person limit on the number of enabled users allowed by the software license, it was necessary to limit the number of enabled users to those personnel that not only can enter CRs, but also can be assigned to respond to them. Security officers are rarely required to respond to a CR. Thus, only Security Department supervisory staff and a select number of security officers hold the enable classification. A security officer who is not "enabled" can contact anyone that is and ask to view the status and/or disposition of a CR.

Related to the OPPD response to Question 4, the NRC 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.

The following is OPPD's Response to Question 4 (as it relates to RAI #7) in Bulletin 2007-01:

OPPD has not conducted any self-assessments on the Access Authorization Program and adherence to the BOP within the last two years. Access Authorization audits are conducted biennially by the QA Department, which is independent of the Access Authorization Program. The audit is performed to provide management with an overview of the effectiveness of the Access Authorization program and the Personnel Access Data System (PADS) program. The audit scope includes assessments to determine that the requirements of 10 CFR 73 are appropriately reflected in the Personnel Reliability Plan (PRP-100). Observations, reviews and interviews are used to assess security screening processes including background investigations, psychological evaluations, and criminal histories. PADS assessments include observations and reviews of data entry, training, system security and configuration control. The previous QA audit of the Access Authorization Program conducted in 2006 had no significant findings. In addition, OPPD assesses the effectiveness of the Access Authorization Program by reviewing NRC inspection results, trending review results, comparisons to industry operating experience, and examining departmental performance indicators.

OPPD has not conducted any self-assessments on the Security Program within the last two years. Security Operations audits are also conducted biennially by the QA Department, which is independent of the Security Department and Security Program. This audit provides management with an overview of the Fort Calhoun Station Site Security and Contingency Plan implementation and overall program effectiveness. The scope of the Security Operations audit includes assessments and observations of the Site Security Plan and procedures, Security Contingency Plan, security system testing and maintenance, security officer duties and responsibilities, training and qualifications, problem identification and resolution, computer software control, ongoing commitments and previously identified corrective action documents.

The biennial Security Operations audit and Access Authorization audit are performed in alternating years. An audit of the Access Authorization Program is currently underway with the next Security Operations audit scheduled for 2009. The previous QA audit of Security Operations conducted in 2007 had no significant findings. In non-audit years, QA surveillances are performed in these areas. Audit results are reported to Security Department Management and to FCS Senior Management. Conditions adverse to quality identified during audit and surveillance activities are entered into the CAP through the initiation of a CR and are reported to the Plant Manager. CRs that are initiated by the QA Department are tracked to satisfactory completion by the QA Department.

The CAP is the principle tool used by OPPD to identify problems and assign appropriate corrective actions. Oversight of this program has been performed at varying levels by site management review committees. OPPD recognizes that CAP improvements are essential to improving performance and has made significant progress in this area. For example, a Performance Improvement group was recently formed comprised of experienced personnel to strengthen the development of apparent cause and root cause analyses. An ongoing initiative is being implemented to strengthen management oversight of the program using consistent program metrics and a focused CARB. Timely and effective identification and resolution of problems before they become significant are key elements of this program's initiative.

Related to the OPPD response to Question 5, the NRC requests the following additional information:

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

Please 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.

The following is OPPD's Response to Question 5 (as it relates to RAI #8) in Bulletin 2007-01:

With the exception of sanctions, OPPD does not differentiate between licensee employees and contractors or subcontractors in implementation of access authorization, fitness for duty, behavior observation, or SCWE.

OPPD assesses the effectiveness of its oversight of contractors and subcontractors by surveys, management tours, peer and general employee observations, security management and supervisory observations, and non-security management and supervisory observations.

FCS Guideline (FCSG)-36, "Supplemental Personnel Management Process" provides guidance for defining the performance objectives and criteria, administrative requirements and responsibilities for personnel having design, maintenance, construction or testing work performed by supplemental personnel that could have an immediate impact on the plant.

OPPD managers and supervisors that oversee contractors and subcontractors:

- Retain ultimate responsibility for ensuring nuclear safety and cannot delegate that responsibility to supplemental personnel
- Ensure that the performance of activities by supplemental personnel is consistent with standards established for station personnel
- Ensure supplemental personnel are trained, qualified, and knowledgeable of those expectations

The OPPD Work Coordinator/Project Manager has the primary responsibility of implementing FCSG-36 and ensuring that contracts or purchase orders contain the appropriate and adequate requirements for supplemental personnel performance. This individual:

- Provides general oversight and monitoring of the supplemental organization
- Is point-of-contact for station personnel for any issues arising from the supplemental personnel
- Has lead responsibility for ensuring that supplemental organizations and personnel:
 - meet appropriate training and qualification requirements
 - understand their accountability for the work or services performed
 - are made knowledgeable of applicable station procedures and processes
 - ensures all aspects of configuration management are met
 - adhere to appropriate contractual requirements
 - attend appropriate training and briefings
 - have or have access to applicable station documents
 - understand work control requirements
 - adhere to quality requirements
 - understand that their performance will be monitored

Industry experience has shown that although supplemental supervisors typically are very knowledgeable of the technical tasks, they are often unprepared to implement station standards or procedures and to fulfill key roles expected by the supervisor. OPPD ensures that expectations for the performance of supplemental supervisors are no different than those for the current station supervisors or are tailored to the specific requirements of the work.

Supplemental supervisors are provided with training or briefings on the following:

- Station expectations and standards of performance for supervisors
- Expectations for supervisor involvement with the workers and field time at the job site
- Expectations for use of plant corrective action processes
- Behavioral Observation Program (BOP – fitness for duty)
- Station standards for worker behavior and use of error-prevention techniques

OPPD's QA Department conducts audits of contractors/vendors who are Unescorted Access Authorization/FFD self-screener. The guidance contained in NEI 03-02, "Access Authorization and Fitness for Duty Program Audits" is utilized for these audits.

SCWE principles are continually observed by the OPPD Management Team and coaching is provided as appropriate. Any nuclear safety or quality concerns are investigated, tracked, and trended.

FCSG-36 applies to the use of supplemental personnel including contractors, vendors used for onsite work, third party engineering support, and supplemental OPPD personnel. Fort Calhoun Station security officers are OPPD employees, which allows OPPD Management to readily communicate and enforce expectations regarding human performance issues such as security officer attentiveness without going through an intermediary.

All departments directly involved in the day-to-day operation and maintenance of FCS are located onsite. Corporate management involvement is provided primarily by the Vice President and Chief Nuclear Officer (CNO) who has overall responsibility for the safe operation of FCS. The Vice President's frequent presence at FCS facilitates corporate oversight of FCS operations and its use of supplemental personnel.