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Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
REQUEST FOR ADDITIONAL INFORMATION
NRC BULLETIN 2007-01 "SECURITY OFFICER ATTENTIVENESS
(TAC NO. MD7656)

- Reference:
1. Jeffrey B. Archie, SCE&G, letter to Document Control Desk, Response to NRC Bulletin 2007-01 dated February 11, 2008 (RC-08-0022)
 2. Robert E. Martin, NRC, letter to Jeffrey B. Archie, SCE&G, Request for Additional Information Re: NRC Bulletin 2007-001 "Security Officer Attentiveness" (TAC No. MD 7656) dated July 8, 2008

South Carolina Electric & Gas Company (SCE&G) received an NRC letter dated July 8, 2008 (Reference 2), requesting additional information (RAI) regarding the Virgil C. Summer Nuclear Station response to NRC Security Bulletin 2007-01 "Security Officer Attentiveness (Reference 2). SCE&G has reviewed the request for additional information and hereby submits the attached response.

If you have any questions or require additional information, please contact Mr. Bruce Thompson at (803) 931-5042.

I certify under penalty of perjury that the information contained herein is true and correct.

08/12/08
Executed on

Dan Dally for JBA
Jeffrey B. Archie
Vice President, Nuclear Operations

SBR/JBA/ac
Attachment

- c:
- K. B. Marsh
 - S. A. Byrne
 - N. S. Carns
 - J. H. Hamilton
 - R. J. White
 - K. J. Browne
 - L. A. Reyes

- R. E. Martin
NRC Resident Inspector
- K. M. Sutton
NSRC
- RTS (CR-08-02899)
- File (815.02)
- DMS (RC-08-0104)

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OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
REVIEW OF SECURITY BULLETIN RESPONSES
SUBMITTED IN RESPONSE TO NRC BULLETIN 2007-01
VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50-395

In responding to each of the following questions, 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 1c. and requests the following additional information:

1. 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 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.

RESPONSE:

Non-security supervisors and management conduct observations of security force personnel and activities. The V. C. Summer Nuclear Station observation program, SAP-1354 "Management Observation, Coaching and Tours Program" requires a minimum of six observations per quarter of which two (2) shall be conducted in a training setting. Although no minimum number of observations is defined for security, in

the last year, there have been nineteen (19) observations of security by supervisory/management personnel not directly responsible for security operations.

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

2. 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.

RESPONSE:

Security officers are provided the opportunity to participate in the safety culture survey. The survey is available to personnel electronically and by paper. The survey is conducted every two years. During the last survey conducted in the third quarter of 2007 Security personnel had a 60% participation rate compared to a 72% overall station response. Feedback on the survey results was provided by a letter from the site vice president and was discussed during mandatory All Hands meetings. The results of the survey were used to develop the safety culture self assessment that is typically held following the survey.

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

RESPONSE:

Management Directive (MD) 30 "Managing Employees Performance" outlines the expectations for employees' performance which includes employee inattentiveness. Inattentiveness or sleeping on the job has long been a level one offense requiring termination of employment and is well known by station personnel. During the last mandatory All Hands meeting, the site vice president addressed the seriousness of inattentiveness on the job. In addition security officers are briefed daily on the importance of maintaining attentiveness during shift turnover meetings.

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

4. 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.

RESPONSE:

Condition Reports (CRs) may be filed using the Computerized Maintenance Management System (CMMS) Condition Report module or they may be manually completed using a form in the CAP procedure. If the manual process is used, the manually written CR is entered into CMMS by their supervisor or Unit Evaluator. While CRs may be reviewed by supervision to ensure the description adequately describes the issue and its content provides sufficient information to support operability and reportability determination, filing a CR does not require supervisory/management approval.

Supervisor review of a CR normally takes place after it has been initiated. The Supervisor screens the CR for importance and determines which group should be responsible for the CR's disposition and overall approval. A CR may be deleted at this point but it remains in the database with a status of delete. Once entered a CR cannot be removed. A CR may be modified after it is entered in the database. If the description is changed, a log of the changes and who made the changes is automatically kept.

When a security officer identifies a condition not meeting expectations at the station, the Central Alarm Station (CAS) supervisor is notified. After screening the notification for safeguards information, the CAS supervisor generates a CR using CMMS. All security officers are trained and encouraged to report all conditions not meeting expectations at the station. Over the past two years at VCSNS, there have been 704 CRs generated by security personnel using this process. Of these, 118 were related to safety issues. The total number of safety issues for the rest of the station for the same period was 685. This ratio is approximately the same as the ratio of security personnel to station staff.

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

RESPONSE:

Individual security officers can request from the CAS supervisor the status of a condition report they have initiated at any time. There is also a dedicated security officer responsible for all security related CRs. This officer can be contacted by any

individual officer for a status update of any CRs they may have generated or have an interest in.

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

6. 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.

RESPONSE:

Section 17.2 of the V. C. Summer updated safety analysis report includes a commitment to perform internal audits as described in the Operations Quality Assurance Plan (OQAP). The OQAP requires that the Security Plan and implementing procedures be audited at least once per 12 months. V. C. Summer Technical Specifications require that the Nuclear Safety Review Committee have cognizance of audits including "the Security Plan and implementing procedures". The Quality Assurance department conducts audits of the security program in accordance with written procedures which implement the above commitments. Audits are performed annually by a team led by personnel certified as Lead Auditors in accordance with ANSI N45.2.23. The teams often include external technical specialists with backgrounds in nuclear security operations. Audit scopes include factors that contribute to attentiveness such as work hours. Findings are entered in the Stations corrective action program and the corrective actions are verified by Quality Assurance. An escalation procedure ensures that the finding rises to the appropriate level of management for ultimate resolution. Results of these audits are reported the Vice-President, Nuclear Operations, and the Senior Vice-President, Generation, and the Nuclear Safety Review Committee, which includes independent members who are not members of the V. C. Summer Nuclear Station organization.

7. 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.

RESPONSE:

At the conclusion of a self-assessment, CRs are generated detailing specific corrective actions to be taken. These corrective actions are then translated into security policies and procedures as appropriate. These policies and procedures are reviewed by the security training staff and incorporated into relevant training lesson plans and training is conducted. For information needing immediate attention, the security staff generates security force bulletins (SFBs) which are communicated directly to each oncoming shift at turnover by shift supervision. Operating experience is coordinated through a control source at the station and submitted to the appropriate organization through a CR for review and disposition. As with the CR actions described above, the OE will be incorporated into policies, procedures and SFBs and communicated to shift personnel. In addition security staff also monitors the Homeland Security Information Network (HSIN), Nuclear Energy Institute (NEI) and Southeastern Nuclear Security Association (SENSA). As appropriate CRs are generated with corresponding actions and the process described above for security officer notification is repeated.

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

8. 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.

RESPONSE:

South Carolina Electric & Gas Company (SCE&G) has utilized the services of a contracted security force for a number of years. To assure the effectiveness of our oversight activities, SCE&G utilizes a performance monitoring system which provides an objective evaluation of the performance of the contracted security force. This performance monitoring system is comprised of the following seven categories:

1. Safety
2. Security Plan and Procedure Compliance
3. Personnel Turnover
4. Contractor Standards
5. Overtime Management
6. Corporate Engagement
7. Operational Excellence

Each of these categories has clearly defined criteria by which they are measured. These performance criteria assure the high standards of performance. Additionally, SCE&G utilizes Key Performance Indicators (KPIs) to monitor the effectiveness of the oversight of security personnel. These KPIs cover the areas of:

1. Fitness for Duty
2. Security Force Loggable Human Errors
3. Open CRs
4. Security Force Training Hours
5. Number of Observations Conducted

Security supervision and management conduct observations of security force personnel and activities in accordance with SAP-1354 "Management Observation, Coaching and Tours Program." This procedure requires a minimum of six observations per quarter of which two (2) should be conducted in a training setting. There have been ninety (90) observations of security conducted by security supervision and management during the past year.

The VCSNS Physical Security Plan also details specific oversight activities for VCSNS security personnel. These include:

- Managing personnel and resources
- Preparing, approving and implementing security procedures
- Assigning an adequate number of security officers to each shift
- Meeting security reporting requirements
- Assuring all security equipment, alarms and detection equipment remain operable

Security plan procedure, SPP-205 "Duties and Responsibilities of Security Force Personnel" requires that contract security force personnel notify VCSNS site supervision whenever a situation arises not specifically covered by procedures. This notification ensures licensee oversight in the resolution of operational deviations.