



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

SECURITY RELATED INFORMATION – WITHHOLD FROM  
PUBLIC DISCLOSURE IN ACCORDANCE WITH 10CFR2.390

August 12, 2008  
NOC-AE-08002335  
File No.: D43.02  
10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission  
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Attachment 2 contains  
Security-Sensitive information  
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South Texas Project  
Units 1 and 2

Docket No. 50-498, STN 50-499

Response to Request for Additional Information Related to NRC Bulletin 2007-01,  
Security Officer Attentiveness (TAC Nos. MD7654 and MD7655)

- Reference:
1. Letter C. T. Bowman to NRC, "Response to NRC Bulletin 2007-01, Security Officer Attentiveness," 02/11/08 (NOC-AE-08002254)
  2. Letter M. C. Thadani to J. J. Sheppard, "South Texas Project, Unit 1 and 2 – Request for Additional Information Related to NRC Bulletin 2007-01, Security Officer Attentiveness (TAC Nos. MD7654 and MD7655)," 07/10/08 (AE-NOC-08001781)

Pursuant to 10 CFR 50.54(f), this letter provides the STP Nuclear Operating Company (STPNOC) 35-day response to Request for Additional Information Related to NRC Bulletin 2007-01, "Security Officer Attentiveness," dated July 10, 2008. The request for additional information is required to complete the final staff assessment of STPNOC's response to the NRC Bulletin.

STPNOC's response is provided in the attachments. Attachment 1 contains STPNOC's response to the request for additional information and Attachment 2 supplements the response provided in Attachment 1.

This response is submitted in accordance with 10 CFR 50.4. Attachment 2 to this letter should be withheld from public disclosure in accordance with 10 CFR 2.390 since it contains sensitive security-related information. The non-sensitive version of this information suitable for public disclosure is provided in Attachment 1.

There are no commitments in this letter.

STI: 32339750

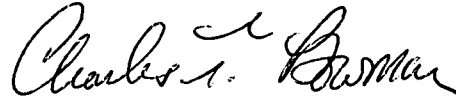
SECURITY RELATED INFORMATION – WITHHOLD FROM  
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A132  
NRR

If you have questions regarding this letter please contact either Robyn Savage (Licensing contact) at 361-972-7438 or me at 361-972-7454.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2008



Charles T. Bowman  
General Manager, Oversight

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- Attachments: 1) Response to Request for Additional Information Related to Bulletin 2007-01  
2) Supplemental Information Containing Sensitive Security-Related Information  
(Withhold from Public Disclosure in accordance with 10CFR2.390)

Attachment 2 contains Security-Sensitive information to be withheld from public disclosure in accordance with 10CFR2.390. Upon separation this page is decontrolled.

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## **Response to Request for Additional Information Related to Bulletin 2007-01**

The NRC requested the following information:

Within 35 days of the date of the NRC Request for Additional Information Related to Bulletin 2007-01, the NRC requests STPNOC to provide information regarding administrative programs and managerial programs and controls established to prevent, identify and correct security personnel inattentiveness and, especially complicity, and failures to implement the behavior observation program (BOP) by individuals among licensee security personnel including security contractors and subcontractors. The NRC 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.

### **NRC Request 1**

The U.S. Nuclear Regulatory Commission (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.).*

### **STPNOC Response (1)**

The post rotation process typically involves one to two officers rotating at a time per unit, until all Security officers have rotated to their next position. Units are defined as areas, i.e. Unit 1, Unit 2, and gatehouse. Personnel may rotate into observation posts, roving patrols, and positions to support vehicle, material and package search and entry into owner controlled, protected and vital areas. Some of these observation posts or roving patrols may serve as compensatory measures, when required. Roving patrols and positions begin the rotation evolution. Those officers in non-roving positions maintain their post or position until relieved face-to-face. The information provided below goes into greater detail regarding specific segments of the overall rotation process. Post rotations for alarm stations and the Owner Controlled Area (OCA) patrol are managed differently as described in STPNOC's initial response to Bulletin 2007-01, Attachment 2.

Security Officers rotate through a set number of posts and positions in any given day. Most of these posts and positions are fixed positions, although there is some latitude in their movement as long as they stay within specified time-lines.

## **Response to Request for Additional Information Related to Bulletin 2007-01**

Post rotations were set shortly after the incident at Peach Bottom. Post Rotations were shortened to combat fatigue associated with: (a) rotating shifts, (b) sitting at one post for long periods of time, (c) complacency of post and (d) general fatigue associated with shift work. One rotation frequency is used for rotating of patrols and positions. See Attachment 2 for standard post rotation frequency. This information is considered sensitive-security related information. The specific activity of the patrol or post was not factored into the review. In a review of the security rotation schedule, management determined that staggering of rotations set to different schedules would be difficult to properly manage. Conditions change at a moments notice therefore one set rule for rotations was determined to be more beneficial for the entire security force.

The length of time for any given patrol or position is not associated with the activity of that post or position. The length of time at any given post is directly associated with the standard rotation frequency. Security at STP maintains its patrol and position frequency of rotations at intervals that result in less "sit" time and more movement. The primary factors considered in determining the rotation frequency was the time spent on patrol or at a position and the amount of movement allowed. When analyzing risks associated with manning security patrols and positions, it was determined that most, if not all security posts maintain equal activity levels associated with fatigue.

### **NRC Request 2**

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 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.*

### **STPNOC Response (2)**

Bullet Resistant Enclosures and Environmental Enclosures manned by security personnel are on an established preventative maintenance schedule. These posts receive preventative maintenance every three months which includes changing air conditioning (A/C) Filters. If any A/C or heating difficulties are observed, deficiencies are reported to Security Management and a Condition Report (CR) is generated. Security positions have assigned equipment tag (TPNS) numbers, which expedite the process of equipment maintenance. This enables the Security

### **Response to Request for Additional Information Related to Bulletin 2007-01**

Department to place security posts into the same Corrective Action Program process used to track equipment problems at the plant.

Security officers complete a checklist each time they assume a post to verify all equipment at the post is accounted for and in an acceptable condition. If any item within the checklist is identified as not present or there may be an issue with it, the identifying officer contacts their supervision, notates the deficiency on the equipment checklist, and a Condition Report is generated, if warranted. The CR number is notated on the same line as the deteriorating equipment and carried over when new equipment checklists are needed. Security supervisors review the checklists on a daily basis and follow-up on any issues that are not being resolved in a timely manner. Other conditions such as leaking water, faulty gun-ports, etc, are immediately reported to Security Supervision who will then perform a walk-down of the identified problem component. A CR is generated and the responsible group contacted for inclusion on a maintenance schedule. If the component needing repair has a high priority, that fact is made evident to the responsible group.

Open CRs are scheduled by the responsible group. Depending on the nature of the needed repair, Security Management will state the need for an expedited repair schedule. The CR associated with the repair is kept open until the repair is completed, unless the Facilities group performs the work. In this case, a Facilities Work Order is created and normally referenced in the CR and the repair activity is tracked using the Facilities Work Order database.

### **NRC Request 3**

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

*3. 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.*

### **STPNOC Response (3)**

As stated in STPNOC's initial response to Bulletin 2007-01, all personnel granted unescorted access are trained in the site's Behavior Observation Program. Therefore, anyone, including a manager not directly responsible for the security program, is able to conduct behavior

## **Response to Request for Additional Information Related to Bulletin 2007-01**

observations on any security officer with whom they come in contact. Typically, this contact would occur at the site entrance checkpoint, the search portal into the Protected Area, or at some occasional posting in an area frequented by plant personnel. All tactical positions are kept locked, even when occupied by a security officer. If a manager desires to make an observation, the manager would contact the site's Security Manager or Security Force Supervisor for clearance, and the clearance would be passed on to the officers on post. There are no procedural requirements for managers not involved in security to make observations of security officers.

Quality department behavioral observations of security personnel are performed on an "audit" scheduled frequency that is performed on an annual basis. This objective is performed in accordance with the Security/Fitness-For-Duty (FFD) Master Scope List and NRC Order for Fitness for Duty Enhancements for Nuclear Security Force Personnel (Fatigue Order). These observations are performed by the Quality Department Security/FFD Area Owner that is a Lead Auditor or by an audit team member as assigned. Audit objectives include verifying that security officers manning access control posts, compensatory posts and patrols perform their duties and responsibilities in an alert and professional manner in accordance with applicable requirements. Although the Quality Master Scope List (MSL) does not include periodic monitoring of this particular objective beyond the audit scope, any observations of officer inattentiveness, made by Quality during other monitoring activities in the field, would be entered into the CR process and brought to the attention of security management.

These would be considered scheduled observations, as audits are officially scheduled with a formal entrance meeting with the audited organization; however, the observations are not scheduled with the security officers being observed.

### **NRC Request 4**

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?*

### **STPNOC Response (4)**

Any employee at STP can initiate a Condition Report (CR). The originator substantiates whether the identified issue represents a Condition requiring documentation in the CAP Database using his/her judgment, consultation with others who may have more knowledge of

### **Response to Request for Additional Information Related to Bulletin 2007-01**

the issue, and use of any of the criteria included in procedure OPGP03-ZX-0002, Condition Reporting Process. Even if the substantiated Condition does not meet the criteria, initiating a CR is still an accepted option. A Condition is defined as "the existence, occurrence, or observation of a situation that requires further review, evaluation, or action for resolution."

The originator can enter a CR directly into the Corrective Action program (CAP) database or have someone with access to the database enter it on his/her behalf. No approval is required prior to the entering the CR into the database. CRs can also be documented by including the required information on a Condition Report Form.

Once the CR is initiated, the originator is responsible for assuring prompt review by a CAP Supervisor through notification of the CR number or providing the CR Form. A CAP Supervisor (approx. 450) is anyone trained in the responsibilities defined in OPGP03-ZX-0002 and need not be the originator's supervisor. The CAP Supervisor is responsible for screening the CR which includes validation, assessing for operability and reportability impacts, and classification. However, for Conditions where security concerns are obvious or perceived, or involve Safeguards Information, the CR should be delivered to the Plant Protection department, or if direct database entry was made, promptly inform the Security Force Supervisor of the CR number and the need for CAP Supervisor screening by Security. The CAP Supervisor promptly validates and screens the Condition based on one or more of the following: (1) discussion with the originator, (2) his/her own professional judgment, (3) consultation with others who may have more knowledge of the Condition and its potential effect, and (4) the guidelines provided in OPGP03-ZX-0002. Once a CR is classified by a CAP Supervisor, the CAP Supervisor ensures prompt entry of the condition into the CAP database if not already performed.

If the Condition is determined to be invalid, the condition still must be entered into the CAP database; however, the CR may be closed with explanation in the CR comments field as to why the CR was invalid. The originator must be notified by the CAP Supervisor of the disposition. In addition, the CAP database automatically sends the originator of any CR an email upon the CR closure of any CR that the individual originated. If a disagreement occurs between the CAP Supervisor and the originator concerning the validity or classification of the CR, then the originator/CAP Supervisor raise the issue to the necessary management level for disposition.

To ensure that the identified Condition is appropriately resolved, the CAP Supervisor or resulting CR Owner ensures the accuracy of the Condition Description and can add additional information or clarifying comments in the CR Description or CR Comments fields. The original Condition Description entered by the Originator may be changed to clarify the description or fix typographical or grammatical errors. For changes to the scope and/or intent of the Condition, the Condition Owner should contact the Originator. This is after the CR has been entered in the database. The CR (number) cannot be deleted; however the data can be modified with restrictions as to the individual's capability to make changes (e.g.; generally limited to the CR owner's organization/department).



## **Response to Request for Additional Information Related to Bulletin 2007-01**

### **NRC Request 5**

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

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

### **STPNOC Response (5)**

Any employee at STP can view the status and/or disposition of a CR at any time. Individuals are provided with login access to the CAP database after completing basic training. All security officers have completed basic CAP training. If the individual does not have access to CAP they can request either a printout of the CR or to view the CR in CAP from any employee with access (to include their supervisor). Each static security position, e.g. BRE, gatehouse, etc. typically has a computer allowing security personnel to access the CAP database at any time to check the status of the CR they generated or to follow up on a condition any individual has generated.

### **NRC Request 6**

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.*

### **STPNOC Response (6)**

With the exception of the Quality Department, there are no periodic, formal assessments of the security program at STP. Occasionally, STP will commission an independent assessment of specific aspects of the security program and these assessors provide feedback on their impressions of security force culture and any comments or recommendations they may have. These comments and recommendations are typically provided privately to the Security Manager and the Contractor's Project Manager. If Security Management decides formal action is required, then a Condition Report would be generated. In the first quarter of 2008, for example, Advanced Marine Technologies Inc. (AMTI ) was contracted for a specific technical assessment; they also provided feedback on security force culture. These comments were general and subjective in nature; therefore, no entries were made into the corrective action program. The technical recommendations are being factored into the budgetary process for possible installation. Additionally, a self assessment team which included a Security Manager and a security officer from San Onofre Nuclear Generating Station, as well as personnel from STP organizations other than security, performed a mid-cycle evaluation of the effectiveness of the CR actions taken to improve security force culture. The results and actions resulting from this evaluation are documented in CAP. Security officers and other representatives from the security organization, participate in various site-wide assessments and surveys. Result of these

### **Response to Request for Additional Information Related to Bulletin 2007-01**

assessments and surveys are communicated by the site Senior Management Team and appropriate action plans are developed and tracked via normal site processes. The last survey was conducted in the fourth quarter of 2007. Actions from the results are being developed by the contractor's on-site Process Improvement Manager.

Quality department performs an annual audit of the Security/FFD Program. This audit includes observations to ensure that the Security organization is in compliance with the Fatigue Order requirements. Audit objectives includes verifying that Security officers manning access control posts, compensatory posts and patrols perform their duties and responsibilities in an alert and professional manner in accordance with applicable requirements. Security and Quality department management are involved and invited to the audit entrance meeting, are involved in daily audit team debriefs, included on distribution of the audit Issues List that is compiled during the audit and distributed daily, and all Quality and Security management are invited to attend the audit exit meeting. All issues that are not satisfactorily resolved during the audit are entered into the CR process.

All Quality Audit findings have follow-up performed by the Audit Team Leader/Area Owner and are documented in a Quality Monitoring report. Quality Management reviews and approves the Quality Monitoring reports as they are completed.

Additionally, the Executive Oversight Board (EOB), an independent oversight group of experienced nuclear professionals assesses various aspects of the security organization during each of their three annual visits to site. Members of the EOB have also participated in special assessments of Security, including event-based and organization-based issues. The EOB is chartered by the CNO and focuses primarily on performance related to the safe and reliable operation of the units. The Board meets three times on-site each year for 3 - 3.5 days per visit, and spends several additional days in preparation and recapitulation of the meetings. The EOB has its own web site where documents of interest are posted for information and review. Areas of potential interest are identified prior to the site visits, and once at STP, interviews and observations become the primary methods for gathering data and developing issues of interest. During the time on-site, the EOB has unrestricted access to all areas of the units to facilitate their ability to provide a comprehensive snapshot of STP performance. At the end of the visit, an exit meeting is held with site management and a formal report that captures the key results is provided. Recommendations are frequently included during the exit meeting and the report; however, they are usually not captured in the corrective action program due to the broad nature of the issues. The EOB uses its reports to follow issues of interest and frequently comments on progress. For example, in January 2008 the EOB interviewed officers, assessed the adequacy of security equipment maintenance, and commented on security organizational issues related to the work environment. Areas identified in January 2008 were monitored again in May 2008 and improvements were noted in several areas including the maintenance of security equipment. During each visit, the EOB also interviews a sample of security organization personnel to help assess the status of the overall culture as well as the safety conscious work environment. In general, security staff and officers are very willing to talk openly about their concerns and issues; they are not hesitant to bring problems to the attention of their supervisors (or the EOB), and are well aware of the various paths available to raise concerns to whatever level is required to have them addressed.

## **Response to Request for Additional Information Related to Bulletin 2007-01**

### **NRC Request 7**

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

*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.*

### **STPNOC Response (7)**

Self Assessment findings are normally communicated through Regulated Security Solutions (RSS – contract security force) Management or STPNOC Security Management to appropriate security personnel based on significance and relevance. The format of these communications are usually oral during shift turnover meetings and/or via email. Formal assessments use performance criteria and objectives that provide a standardized methodology to measure performance and identify performance gaps. Simple self-assessments typically use criteria based on procedural requirements, e.g. was it done or not done. Assessment criteria is reviewed and approved by security management in advance of the assessment. Assessment findings are categorized as either a deficiency or opportunity for improvement and are defined in OPGP03-ZX-0003, Station Self Assessment Program. Communicating assessment findings is not proceduralized and is at the discretion of STPNOC and RSS Security Management; however significance and relevance of the findings are decision points in determining what is communicated and to whom within the organization it is communicated.

Relevant operating experience is shared with appropriate security personnel. All operating experience is reviewed for applicability. Applicability is determined by the subject matter of the operating experience and procedure OPGP03-ZX-0013, Industry Events Analysis. Liaison with subject matter experts in determining applicability, e.g. security maintenance, security training, engineering, etc. is sought, when needed. Once the operating experience is deemed applicable, it is communicated to security staff, security operations personnel, security training personnel, security maintenance personnel, engineering personnel, or others, as appropriate, based on the specific subject matter. On average, relevant operating experience is shared with on-shift security force personnel on a weekly basis.

## **Response to Request for Additional Information Related to Bulletin 2007-01**

### **NRC Request 8**

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) 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.*

### **STPNOC Response (8)**

Administrative Policy STP-427, Contractor Performance Oversight sets forth guidelines regarding long-term contractor oversight performed by the Contractor Review Board (CRB) and Contractor Personnel Action Review Board (CPARB). The CRB reviews contractor performance and determines the level of STP oversight needed to ensure proper performance. The CRB provides assurance that STP expectations regarding culture and teamwork are communicated to contractors, that contractor performance is consistent with STP policies, procedures, and practices, and that contractor personnel actions do not violate 10 CFR 50.7, Employee Protection. The CRB is chaired by the General Manager Oversight and includes the Training Manager, Information Technology Manager, Performance Improvement Manager, and an At-Large Member.

Presentations and information to the CRB are provided by Contract Technical Coordinators, Employee Concerns Program (ECP) Manager, CPARB Chairperson, and others designated by the CRB Chairperson. Other sources for monitoring contractor performance include organizational culture survey results, the Nuclear Regulatory Commission and Operating Experience. The CRB makes recommendations to the Senior Management Team (SMT) and defines paths for implementing actions (e.g. increased level of STP oversight). Contract Technical Coordinators make presentations, at least annually, to the CRB. In summary, the presentations to the CRB and the other sources of information reviewed by the CRB (e.g. organizational culture survey results) provide an effective tool for assessing performance of contractors.

The level of oversight provided by the CPARB was described in STPNOC'S response to NRC Bulletin 2007-01, dated February 11, 2008. Since the response to the Bulletin, the performance of the security and janitorial contractor personnel has been determined to provide assurance that the personnel actions have not violated 10 CFR 50.7, have not created a chilling effect in the affected workgroup and/or other workgroups on site, the proposed actions have been consistent with established policies, procedures and practices, and the actions have been

## **Response to Request for Additional Information Related to Bulletin 2007-01**

consistent with STP expectations. As a result, the scope of the personnel actions deemed necessary to be reviewed by the CPARB has been reduced while maintaining an open line of communications between this Board and the Contractor Technical Coordinator. This has been a measure of effective oversight.

STP procedure 0PGP03-ZP-0013 provides the requirements for managing, monitoring, reporting and rating contractor performance. This procedure designates the Contract Technical Manager (CTM) as the individual charged with the responsibility to provide management level oversight of the Contract Technical Coordinator and the Purchase Order/Contract.

Assigned duties for CTMs is to provide direction to Contract Technical Coordinators (CTC), the specific duties described in 0PGP03-ZP-0013 for a CTM are:

### **CTMs**

- Assess the relative risk of a contract and decide if a CTC should be assigned
- Assess the relative risk of the service to be performed to determine if a Post-Award/Pre-Work meeting be held
- Review vendor performance ratings

The specific duties of a CTC as described in 0PGP03-ZP-0013 are:

### **CTCs**

- Read and understand the contract they are being asked to monitor
- Understand the work and equipment supplied by the contractor
- Understand the applicable STP procedures applicable to the work
- Develop a performance monitoring plan
- Perform post award/pre-work meetings with the contractor
- Receive and review contractor documents
- Review qualification of contractor personnel
- Schedule training of contractor personnel
- Review and approve technical submittals
- Ensure contractor is properly using the site Corrective Action Program
- Review staffing plan (s)
- Review and approve contractor's schedule
- Confirm schedules and manpower requirements
- Establish material delivery schedules
- Assist and coordinate contractor mobilization and demobilization
- For contracts in the radiologically controlled area (RCA) ensure contractor employees have sufficient available dose to complete all work without exceeding STP limits. Additionally ensure contract employees have their complete dose history
- Submit contractor's safety plan to STP safety department
- Review list of consumables required to do the work
- Monitor contractor's work for qualified individuals and compliance with safety expectations.

**Response to Request for Additional Information Related to Bulletin 2007-01**

- Ensure all work is complete at the end of the contract and meets the requirement of the contract.

Typically STP would not assign duties for the contractor's and subcontractor's supervisor(s) or manager(s) responsible for overseeing the contractor and subcontractor staff at the site. Contractor's supervisors and managers are expected to follow and support all site programs for such functions as; fitness for duty, safety etc. In addition, all contractor supervisors and managers should have a good understanding of STP's Safety Conscious Work Environment.

As discussed above, Site Management in the form of the SMT receives recommendations from the CRB regarding paths for implementing actions such as increased level of STP oversight. The SMT consists of the Site Vice President, Vice President of Engineering, Vice President of Shared Services, the Plant General Manager, the General Manager of Oversight and the General Manager of Outage and Strategic Projects. The results of organizational cultural assessment surveys are reviewed by Site Management and implementing actions to resolve organizational performance issues, including contractor performance, identified in these surveys are approved by Site Management. In addition, the Manager of the Employee Concerns Program, which can be an indicator of contractor performance issues, reports directly to the President and Chief Executive Officer of STPNOC.