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50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING NUCLEAR REGULATORY COMMISSION  
BULLETIN 2007-01: SECURITY OFFICER ATTENTIVENESS

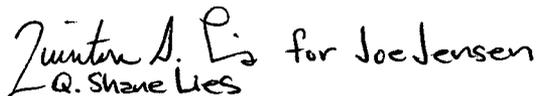
- References:
1. Nuclear Regulatory Commission (NRC) Bulletin 2007-01, "Security Officer Attentiveness," dated December 12, 2007.
  2. Letter from Joseph N. Jensen, Indiana Michigan Power Company (I&M), to NRC Document Control Desk, "Response to Nuclear Regulatory Commission Bulletin 2007-01: Security Officer Attentiveness," AEP:NRC:8054, dated February 11, 2008 (ML080510577).
  3. Letter from Peter S. Tam, NRC, to Michael W. Rencheck, I&M, "Donald C. Cook Nuclear Plant – Request for Additional Information RE: Security Bulletin 2007-01 "Security Officer Attentiveness" (TAC Nos. MD7590 and MD7591)," dated July 2, 2008 (ML081820859).

The Nuclear Regulatory Commission (NRC) issued Reference 1 to obtain information necessary to determine the status of licensee programs regarding the adequate and consistent implementation of their security programs in light of recent security-based incidents at certain sites. By Reference 2, Indiana Michigan Power Company responded to Reference 1. Reference 3 transmitted an NRC Request for Additional Information regarding the response in Reference 2. The enclosure to this letter provides the requested information.

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NRC

There are no new or revised commitments in this letter. Should you have any questions, please contact Mr. John A. Zwolinski, Regulatory Affairs Manager, at (269) 466-2478.

Sincerely,

  
Q. Shane Lies  
Joseph N. Jensen  
Site Support Services Vice President

RSP/rdw

Enclosure

c: T. A. Beltz – NRC Washington, DC  
J. L. Caldwell, NRC Region III  
K. D. Curry, AEP Ft. Wayne, w/o enclosure  
J. T. King, MPSC  
MDEQ – WHMD/RPS  
NRC Resident Inspector

**AFFIRMATION**

I, Joseph N. Jensen, being duly sworn, state that I am Site Support Services Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company

*Quinton A. Lis for Joe Jensen*  
*- Q. Shane Lees*

Joseph N. Jensen  
Site Support Services Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 8<sup>th</sup> DAY OF August, 2008

*Bruce Hay*  
Notary Public

My Commission Expires: 6/10/2013



INDIANA MICHIGAN POWER COMPANY (I&M) RESPONSE TO  
NRC BULLETIN 2007-01  
SECURITY OFFICER ATTENTIVENESS  
REQUEST FOR ADDITIONAL INFORMATION

In responding to each of the following questions, the licensee should provide information that addresses measures that are currently in place, and any additional planned actions with expected completion dates.

**The 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 its 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.)

**I&M Response:**

(1) Armed security personnel normally rotate in six rotations; North Access Control Center (NACC), North Deltas, South Deltas, In-Plant, CAS/SAS and Owner Control Area (OCA). The posts that the officers assume include; vehicle patrol, In-Plant walking patrol, In-Plant Security Hut, BRE, standing at security equipment at indoor locations, offices, alarm stations, and Outdoor Security Hut. Rotational positions are those where an officer leaves a position, office or BRE, and physically travels a distance to a location where the officer may have interaction with other officers or plant personnel, use of restroom facilities or cafeteria/vending machines, and continue on to another stationary post. Stationary posts are those posts where the officer is placed in a location or post and the officer maintains that static location for the period of the post. The In-Plant stationary posts also perform ancillary duties such as patrols and alarm response.

(2) The six rotations are structured as follows:

- NACC – stationary as the personal search officer (x-ray operator), rotational duty as the North Security Officer, stationary as the North Access Control Officer (last access control), rotational duty as the North Security Officer, stationary as the vehicle search officer (office), rotational duty as the North Security Officer, and stationary as the Delta 9 (office);
- North Deltas – stationary as a BRE Officer, rotational as the Support Officer, and stationary as a BRE Officer;

- South Deltas – stationary as a BRE officer, rotational as the Support Officer, and stationary as a BRE Officer;
- In-Plant – stationary as an In-Plant Hut Officer, rotational as an Alarm Response/Patrol Officer, stationary as an In-Plant Hut Officer;
- CAS/SAS – operators rotate through the CAS and SAS with one operator providing relief;
- OCA – stationary as the Traffic Officer (vehicle search/personal identification/outdoors), stationary as a BRE Officer, mobile as the Vehicle Patrol, rotational as the Support Officer, and stationary as the Vehicle Search Officer (hut).

The rotational schedule was developed with the concept that the officers would be in a stationary post for a specified time frame, leave the confines of the stationary post, walk to the next post which may consist of meeting with other security or plant personnel, use of a restroom, access of a cafeteria/vending machines, and then continuing on to another stationary post. The development of these rotations was based upon the fact that the officer would be in a secluded location for a specified time period and then placed in a position where there would be physical contact with other personnel.

Officers typically are not reassigned to the same rotation from one day to the next. Each day, an officer rotates from one rotational schedule to the next, i.e., day one assigned to the North Deltas, day two assigned to the South Deltas, day three assigned to the In-Plant, day four to the NACC.

(3) Security personnel assigned to stationary posts are typically assigned for either 1½ hours or 2 hours. Rotational posts are assigned for typically ½ hour periods.

The rotational period and the locations of the rotations were taken into consideration when they were developed. The concept involved the observation that officers would rotate through all shift positions within a four day schedule. This concept focused on the fact that all officers would remain aware with all posts and any changes to plant configurations.

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

- (2) Describe any licensee processes or programs that are in place to identify problems in climate controlled security areas. What methods are used to track, inspect, and ensure timely repairs are completed? Include the following information in your response:

A description of how the security areas are maintained, including, but not limited to: (1) a discussion of the maintenance and/or preventive maintenance process and programs in place for these security areas including an overview and brief discussion on routine inspection schedules by maintenance personnel; (2) a discussion on the process a security officer can follow to report concerns with the up keep and maintenance of his or her post; and (3) a discussion on the timeliness of repairs and any follow up actions taken by the licensee to ensure the repairs are completed and resolved adequately.

**I&M Response:**

- (1) Security posts are maintained in accordance with plant procedures. Preventive maintenance is in the form of monthly checks seeking to identify any equipment requiring support from our Maintenance department. Some equipment due to its component cost is run to failure. This equipment is identified and a minimum/maximum number of replacements are maintained in the Plant Stock Code system. When failures of climate control equipment do occur, a Work Request (WR) is generated within the plant Local Area Network system. The WR is processed by the on-shift security personnel who identify the failure. This WR is then processed and usually assigned to the plant Maintenance department. Failures of climate control systems which may affect the officer, such as the In-Plant hut, the officer may be relocated from that position until the equipment is put back into service. The relocation area will be within the required response criteria. Depending on the severity of the failure, maintenance personnel may be called in on back shifts to immediately address the situation/repair.
- (2) Any security officer or personnel at the plant may generate a WR. These WRs are then handled in accordance with plant procedures. Security supervision also performs shiftly tours of all assigned security posts to communicate with the officers, inspect the post for equipment condition, and security equipment condition. The officer assigned to the post may report a problem directly to the supervisor for input to the WR process or generate the WR themselves. WR initiated by the shift are reported on the Security Shift report which is reviewed on a daily basis by Licensee Security Management.
- (3) Repairs of security climate controlled equipment are reviewed on a daily basis by the Security management team (Licensee and Contractor). If necessary, Security management addresses these concerns with the Maintenance department management for their support and response to the equipment. If the repair cannot be supported in a time frame determined by Security, the issue is raised to the Operations Shift Manager to raise the maintenance priority and timeliness of the repair. The equipment will be returned to service in accordance with the Plant Maintenance priorities.

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

- (3) What is the level of involvement from management personnel 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 personnel, 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 personnel 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.

**I&M Response:**

The Contract management personnel are required to perform two types of routine/random observations. The first is performed by the on-shift security supervisor who must perform a shiftly visit to all posts. This is a documented visit, the reports are provided to the Contract management, and the reports are available for review for a period of 30 days. Contract staff management (Project Manager, Operations, and Training Coordinator) are required to perform a back shift visit at least monthly. Licensee Security Management (Security Manager, Security Operations Analyst, and Principal Nuclear Specialist) personnel are required to perform two back shift visits monthly (weekends and evenings). These reports are provided to the Security Manager for review. These back shift visits are not required by procedure.

Plant management personnel, including the Chief Nuclear Officer/Senior Vice President, Site Vice President, Support Services Vice President, and Plant Manager, as well as all site management personnel have the ability to perform observations of most security positions. These observations would be considered random and are not proceduralized. Corporate personnel are not on site except in a visitor role, and therefore, do not perform any observations of security personnel.

All plant management personnel including Plant Operations Shift Managers, Plant Maintenance Managers/Supervisors and Performance Assurance (PA) Supervisors have the ability to observe security personnel during the normal performance of their duties. These observations would be considered random and are not proceduralized. These observations would include the officers at the main entrance to the OCA, main entrance to the Protected Area, and the In-Plant positions. Security does not use shading or tinting of windows of In-Plant security locations, so the location and actions of the officer are in plain view of the passer-by. Questions of the status or observations are directed to the Shift Security Supervisor for resolution/investigation. All plant supervisors have the capability of being allowed access to the alarm stations or BREs with prior notification to the Licensee security staff for granting temporary authorized access.

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

- (4) 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?

**I&M Response:**

Security personnel participate in several different surveys. The Contractor provides a monthly Safety Conscious Work Environment (SCWE) survey to a limited number of random officers for their input as to the work environment. In addition to the monthly random contractor surveys, CNP does conduct periodic SCWE surveys to which both licensee and security personnel participate in. However, the participation rate is not measured. During the Contractor Shift Post Check, the supervisor is required to ask specific questions of the officer for their input. Both the officer and the supervisor initial/sign the form.

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

**I&M Response:**

For security personnel there is a specific procedure outlining the requirements of the Working Hour Limitations as they apply to security personnel. Security personnel are reminded on a shiftly basis concerning Fitness for Duty concerns and discussing any issues with the Shift Security Supervisor. In addition, each officer is provided a shift "Hot Sheet" with the shift awareness issues and post rotations. This form contains a specific note that "If during the course of the shift, you feel fatigued or cannot continue your shift, contact the SSS, in accordance with SPP-2060-SFI-107, Personal Declaration of Fatigue. (Do Not Remove)".

Fitness for Duty is covered In General Employee Training on an annual basis.

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

- (6) Describe the process for employees to file reports through the site corrective action program (CAP). Can employees file CAP reports without prior supervisory/management review or approval? Include the following information in your response:

Describe the process for employees to file reports through the CAP. Discuss the supervisor/management review and/or approval process including, but not limited to: (1) does a supervisor/manager have the authority to reject a report before entering it into the corrective action program without additional management review and approval; and (2) does a supervisor/manager have the authority to modify the report before such report has been entered into the CAP.

**I&M Response:**

All personnel on site can provide information for a report through the site CAP. Input to the CAP may be either electronically or through the submittal of documented action request (Plant Procedure PMP-7030-CAP-001 Action Request (AR) Initiation). The

procedure states to "Discuss the condition with a supervisor or appropriate personnel in the responsible organization to:

1. Validate the condition exists.
2. Verify the condition is not already reported....If it cannot be verified, then initiate the AR."

ARs may be initiated anonymously.

1. A supervisor/manager does not have the authority to reject a report before it is entered into the AR program without additional management review and approval.
2. A supervisor/manager does not have the authority to modify the AR report before such report has been entered into the CAP.

The report is then reviewed by the assigned organization for the appropriate trending codes and assignment type (such as condition evaluation, apparent cause evaluation, root cause evaluation). At any point in time, the originator may check the status of the AR and review if any changes/assignments are/were made. The AR is then forwarded to the Initial Screening Committee for review of the condition, appropriate severity, trend coding, responsible organization, and assignments. The report is then forwarded to the Management Screening Committee for a final review of the same aspects and ultimately assigned to the appropriate department.

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

**I&M Response:**

No, the information must be requested. Not all plant employees, specifically the security officers, have access to the computer database that processes the ARs.

All plant employees who have access to the company computer Local Area Network, have access to the AR or WR process. This computer process allows all personnel to review initiated ARs, either by subject or AR number. Personnel initiating an AR may also check a box on the form which requires the responsible organization for the AR, to provide direct feedback. This feedback is controlled by a plant procedure and must be in the form of either a telephone call or face-to-face with the originator. Once the AR has completed the Initial and Management Screening Committee review, the report is "pushed" to another computer database (INDUS).

The INDUS database is not readily accessible to all plant personnel. A status or disposition may be requested by personnel to those individuals who have access to the computer database. This information is shared freely with security personnel.

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

- (8) 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.

**I&M Response:**

The Donald C. Cook Nuclear Plant (CNP) Security program is assessed on an annual basis by the PA organization. This organization reports directly to the site Chief Nuclear Officer/Senior Vice President. The assessments include examination of all facets of the security program, from training, operations, searches including personnel, vehicle and material, and appropriate documentation. The assessments are performed by members of the PA organization. In many instances PA will retain outside independent "experts" from another site to provide an independent perspective of the security department. Findings from these assessments are entered into the CAP. An exit briefing is conducted at the conclusion of the assessment which includes the security management, PA management, and senior site management, either the Chief Nuclear Officer, Site Vice President, or Support Services Vice President. The findings are entered into the CAP and are reviewed by the PA organization prior to closure. Any differing opinions as to the closure are discussed, and, if necessary, the action reopened for further evaluation/action.

- (9) 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 the staff; and (3) training opportunities for the staff to read and understand the policy.

**I&M Response:**

The OE process at CNP is governed by formal procedures. CNP's OE process includes a committee which reviews all OE and, as applicable, assigns the OE to the responsible organization for review. The responsible organization is then required to provide feedback to the OE Coordinator as to whether or not to perform a formal evaluation of the OE. Formal evaluations are entered into the CAP and appropriate actions to resolve the concern are also documented. In addition, the security contractor has an independent OE process which is also shared with security personnel.

OE is communicated with security personnel. This communication is both formal and informal. The formal communication is in the form of a pre-job briefing. The pre-job

briefing includes a requirement to provide OE relating to the particular function that is about to be performed. The informal process is through the use of the daily Security Management meeting. OE is captured as a separate agenda item during this meeting, and an individual e-mail is sent to all security personnel with this same information. The OE plant procedures are available to all plant personnel.

The Self Assessments (SA) process is governed by formal procedures. SAs are conducted in two formats, a Quick Hit (QH) SA and the full SA. SAs are periodically conducted within the Security Organization and there are normally 3-5 QHSA conducted annually, and Security Program SA conducted at least every 2 years. Lead personnel responsible for performing SA are trained in the performance of this task and tracked on the Plant Training Qualification Matrix. SAs are conducted with both licensee and contract personnel involved in the assessments. During both processes (QHSA and full SA), findings from the SA and relevant corrective actions are placed into the CAP process. These ARs are captured in the Security daily management meeting process and a copy of this information is provided to the security officers on a daily basis. The distribution of this information is considered an informal process and is not procedurally controlled. Training is not required or provided to understand this communication process.

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

- (10) How do you assess the effectiveness of your oversight of contractors and subcontractors? 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 the 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.

**I&M Response:**

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

- (1) CNP implements the contractor oversight through the use of a Plant Manager procedure, PMP-3140-CON-003, Oversight of Contractors. The purpose of this document is to provide guidance for accomplishing effective oversight of contracted service at CNP. It is the responsibility of CNP management to ensure an adequate combination of basic elements is in place for each contracted service at the site. Successful oversight of the contracted services consists of the following five basic elements:

- Clear understanding by all participants of their roles, responsibilities, and authorities.
  - Direct contractor supervision of their workforce
  - Sufficiently clear and detailed work packages instructions for a transient workforce.
  - Adequate training to provide the required knowledge and skill set to accomplish the work in accordance with established standards and expectations for a nuclear plant environment.
  - Effective site oversight and monitoring of the contracted activity.
- (2) Licensee supervisors/managers shall perform the following duties in overseeing contractors and subcontractors at CNP:
- Review the contract to ensure that any work to be performed by contractor is adequately covered by the existing contractual descriptions.
  - Track the contractor performance, as required, determining whether incentives (if any) have been earned or liquidated damages apply.
  - Make performance observation per procedure which stipulates the minimum observation criteria for those suppliers who are performing work at the site.
  - Ensure that the contractor performs only the work described in the contract and performs it at the site specified.
  - Approve contractor's invoices, based on contract pricing information ensuring that the costs are being charged to the correct accounting.
  - Maintain a contract file during the work. This file should include, but not limited to:
    - Performance/behavior issues
    - Progress report/schedules
    - Procedures
    - Quality related documents
    - Safety report (near miss, accident documentation)
    - Correspondence (letter, e-mails, telecommunications)
    - Meeting minutes
    - Transmittals
- (3) The contract supervisors/managers shall provide a set of expectations for conducting work at CNP to their workers. At a minimum, the expectations will address the elements identified below, as appropriate for the work being performed by the contractor.
- Industrial safety performance
  - Professionalism (behaviors)
  - Work practice adherence to CNP fundamentals
  - Cost and schedule effectiveness
  - Instruction clarity
  - Conveying expectations
  - Document maintenance
  - Roles and responsibility
  - Communications
  - Human performance
  - Overall perspective
  - Field observation

- Housekeeping.
- (4) There is no corporate (management) involvement with the oversight of contractors and subcontractors at the site.