

OFFICIAL USE ONLY - SECURITY-RELATED INFORMATION

May 20, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer
AmerGen Energy Company, LLC
4300 Winfield Road
Warrenville IL 60555

SUBJECT: CLINTON POWER STATION
NRC SECURITY BASELINE INSPECTION REPORT 05000461/2008402(DRS)

Dear Mr. Pardee:

On April 18, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed a security baseline inspection at your Clinton Power Station and Exelon Nuclear Corporate Office. The inspection covered one or more of the key attributes of the security cornerstone of the NRC's Reactor Oversight Process. The enclosed inspection report documents the inspection results, which were discussed on April 18, 2008, with Mr. F. A. Kearney and other members of your staff.

The inspection examined activities conducted under your license as they relate to security and compliance with the Commission's rules and regulations and with the conditions of your license. The inspector reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room). However, because of the security-related concerns contained in the enclosure, and in accordance with 10 CFR 2.390, a copy of this letter's enclosure will not be available for public inspection.

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C. Pardee

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

Eric Duncan, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 50-461
License Nos. NPF-62

Nonpublic Enclosure: Inspection Report 05000461/2008402(DRS)
w/Attachment: Supplemental Information

cc w/encl: D. Riffle, NSIR/DSO/DDSO
State Liaison Officer, State of Illinois
C. Williamson, Clinton Site Security Manager

cc w/o encl: Site Vice President - Clinton Power Station
Plant Manager - Clinton Power Station
Regulatory Assurance Manager - Clinton Power Station
Chief Operating Officer and Senior Vice President
Senior Vice President - Midwest Operations
Senior Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs
Manager Licensing - Clinton, Dresden and Quad Cities
Associate General Counsel
Document Control Desk - Licensing
Assistant Attorney General
Chairman, Illinois Commerce Commission
Illinois Emergency Management Agency

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cc w/o encl: Site Vice President - Clinton Power Station
Plant Manager - Clinton Power Station
Regulatory Assurance Manager - Clinton Power Station
Chief Operating Officer and Senior Vice President
Senior Vice President - Midwest Operations
Senior Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs
Manager Licensing - Clinton, Dresden and Quad Cities
Associate General Counsel
Document Control Desk - Licensing
Assistant Attorney General
Chairman, Illinois Commerce Commission
Illinois Emergency Management Agency

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Letter to Charles G. Pardee from Eric Duncan dated May 20, 2008.

SUBJECT: CLINTON POWER STATION
NRC SECURITY BASELINE INSPECTION REPORT 05000461/2008402(DRS)

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 05000461

License No: NPF-62

Report No: 05000461/2008402(DRS)

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, IL

Dates: January 22 through 24, 2008 (Exelon Nuclear Corporate)
April 14 through 18, 2008 (On-site)

Inspectors: D. Funk, Senior Projects Specialist
J. Maynen, Senior Physical Security Inspector
G. Hansen, Physical Security Inspector

Approved by: E. Duncan, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000461/2008402(DRS); 01/22/2008 – 01/24/2008, Exelon Nuclear Corporate;
04/14/2008 - 04/18/2008; Clinton Power Station; Routine Security Baseline Inspection.

This report covers a 2-week period of announced routine baseline inspection on security. The inspection was conducted by three Region III physical security inspectors. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

A. Inspector-Identified and Self-Revealed Findings

Cornerstone: Physical Protection

No findings of significance were identified.

B. Licensee-Identified Violations

None.

REPORT DETAILS

3. **SAFEGUARDS**

Cornerstone: Physical Protection (PP)

S02 Access Control (71130.02)

a. Inspection Scope

The inspectors evaluated this area by: reviewing program procedures, implementing procedures, and records; conducting interviews with responsible personnel and plant employees; and performing walkdowns.

The inspectors verified that: (1) the licensee's Access Control program complied with the NRC-approved security plan and any other applicable regulatory requirements; (2) the licensee has control measures and equipment in place to detect and prevent the introduction of contraband into the protected area; and (3) the licensee's identification and authorization processes ensure that only those personnel that have been properly screened are granted unescorted access to the protected and vital areas.

The inspectors conducted the following specific inspection activities:

- reviewed and evaluated safeguards log entries and corrective action documents dated between November 2007 and March 2008 (no licensee event reports were issued);
- verified that: (a) the licensee has a procedure that adequately describes the method to immediately notify security to block badges for personnel who have had their access suspended; (b) individuals responsible for implementing personnel access denial procedures are knowledgeable of how to effectively implement the procedures; (c) identified procedure changes have not reduced the effectiveness of any of the security plans; and (d) the licensee implements and maintains measures, as necessary, to protect badging and/or other access control activities;
- verified that: (a) in-processing searches of personnel, packages and vehicles at access locations during peak ingress times are performed in compliance with established procedures; (b) any collateral duty that security personnel may perform does not adversely impact their ability to perform their primary duty; (c) the licensee has sufficient staffing for processing personnel and equipment at the access control points; and (d) the licensee properly implements processes for control of packages and materials, and for material that is exempted from search;
- verified that the licensee manually controls access to vital areas when electronic controls are not in service; and
- verified that: (a) the licensee has a program in place for controlling and accounting for hard keys to protected and vital areas, and for the replacement or changing of lock cores if a key is lost or compromised; (b) bullet-resistant glazing

in the admittance control point has maintained its transparency and does not show signs of crazing, discoloration, or separation of layers that would impair its use for visual monitoring and identification; (c) the licensee has control of all places where packages, personnel, and vehicles can be brought into the protected area; (d) access control personnel identify authorized packages and can identify unauthorized packages and materials; and (e) the licensee implements and maintains control functions for vehicles delivering hazardous material within the protected area.

The inspectors routinely reviewed access control program-related issues during baseline inspection activities to verify that they were being entered into the licensee's corrective action system at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and adequately addressed.

The inspectors completed 16 of the required 16 samples.

b. Findings

No findings of significance were identified.

S08 Fitness-for-Duty Program (71130.08)

a. Inspection Scope

The inspectors evaluated this area by: reviewing program procedures, implementing procedures, and records; conducting interviews with responsible personnel and plant employees; and performing walkdowns.

The inspectors verified that: (1) the licensee's Fitness-for-Duty (FFD) program complied with the NRC-approved security plan and any other applicable regulatory requirements; (2) changes to the licensee's FFD program met commitments to resolve previously identified issues or NRC requirements and did not adversely affect the prescribed performance requirements; and (3) the licensee was properly implementing requirements to ensure that nuclear facility security force personnel were not assigned to a duty while in a fatigued condition that could reduce their alertness or ability to perform functions necessary to identify and promptly respond to plant security threats.

The inspectors conducted the following specific inspection activities:

- reviewed and evaluated safeguards log entries and corrective action documents between November 2007 and March 2008 (no licensee event reports were issued);
- verified that: (a) changes to the licensee's FFD program implementing procedures were commensurate with regulatory requirements; (b) changes to the licensee's FFD policies and procedures were reviewed, approved, distributed, and retained as required; and (c) all contractor and vendor personnel performing activities under the scope of 10 CFR Part 26 were subject to either the licensee's FFD program or a contractor/vendor program that had been formally reviewed and approved by the licensee;

- verified that: (a) changes to the licensee's FFD Organization and Management Control met regulatory requirements and that these changes did not adversely affect the FFD program; and (b) if key personnel changes were made, the new personnel understood their responsibilities and authorities and were qualified to perform intended functions;
- verified that FFD awareness training, supervisory training, escort training, and, where applicable, refresher training, were provided and taken as required; and (b) changes made to the licensee's FFD policies or program were incorporated into the licensee's FFD training program;
- verified that for the licensee's chemical testing program that: (a) the process for selecting individuals for random testing was random, such that individuals who were selected for random testing were tested, and that the personnel tested were immediately eligible to be selected for another random test; (b) the number of random tests conducted each year was equal to at least 50 percent of the workforce population subject to testing; (c) licensee personnel who returned to duty after a 3-year removal received follow-up testing on an unannounced basis to verify continued abstention from the use of substances; (d) testing procedures protected the identity and integrity of specimens and minimized false negative test results if the licensee conducted on-site urine testing; and (e) any changes made to the program met regulatory requirements and did not adversely affect the licensee's FFD program;
- verified that the licensee maintained an Employee Assistance Program with a goal of achieving early intervention and providing confidential assistance;
- examined licensee audit reports for the FFD program, since the last inspection, to determine compliance with NRC requirements and whether licensee commitments and corrective actions to resolve identified issues were technically adequate, met regulatory requirements, and were implemented in a timely manner; and
- verified for security force working hours required by the FFD Order that the licensee: (a) ensured individual work hour limits were not exceeded and that management approved deviations were authorized and documented; (b) ensured group work hour limits were not exceeded under normal plant conditions, planned plant or planned security system outages, unplanned plant or unplanned security system outages, increases in plant threat condition, and during force-on-force exercises; and (c) developed procedures/processes that: (1) controlled the work hours program; (2) provided the ability to self-report being unfit for duty; and (3) ensured self-declarations were documented and that at least 10 hours passed prior to returning to duty.

The inspectors routinely reviewed FFD program-related issues during baseline inspection activities to verify that they were being entered into the licensee's corrective action system at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and adequately addressed.

The inspectors completed 22 of the required 22 samples.

b. Findings

No findings of significance were identified.

40A1 Performance Indicator Verification (71151)

Cornerstone: Physical Protection

.1 Safeguards Strategic Area

a. Inspection Scope

The inspectors sampled licensee submittals for the performance indicators (PIs) listed below for the period from April 2007 through March 2008. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, was used to verify the basis for reporting each data element. A sample of plant reports related to security events, security shift activity logs, and Fitness-for-Duty reports were also reviewed. The following three PIs were reviewed:

- Fitness-for-Duty Personnel Reliability;
- Personnel Screening Program; and
- Protected Area Security Equipment.

The inspectors completed 3 of the required 3 samples.

b. Findings

No findings of significance were identified.

40A5 Other Activities

Temporary Instruction 2201/002, Inspection of Transition of Contract Security to Proprietary Security Force

.1 Access Authorization (71130.01)

a. Inspection Scope

The inspector evaluated this area by: reviewing program procedures, implementing procedures, and records; and conducting interviews with responsible personnel and plant employees.

The inspector verified that: (1) new security officers or other individuals hired or re-assigned from other duties met the requirements of the licensee's access authorization program in accordance with the NRC-approved security plan, regulatory requirements, and any other applicable Commission requirements; and (2) those contract security personnel not subsequently re-hired into the proprietary security force were denied access to the protected area in accordance with the NRC-approved security plan, regulatory requirements, and any other applicable Commission requirements.

b. Findings

No findings of significance were identified.

.2 Protective Strategy Evaluation (71130.05)

a. Inspection Scope

The inspector evaluated this area by: reviewing procedures and records; and conducting interviews with responsible personnel and plant employees.

The inspector verified that: (1) the licensee maintained the appropriate number of armed responders and armed security officers in the protected area to support the implementation of the licensee's protective strategy; and (2) the new security officers or other individuals hired or re-assigned from other duties in support of the transition have been trained and are qualified to successfully implement the site protective strategy in accordance with NRC-approved security plans, regulatory requirements, and any other applicable Commission requirements.

The inspector conducted the following specific inspection activities:

- reviewed records of security personnel to verify the licensee maintained adequate staffing levels to support the implementation of the protective strategy throughout the transition; and
- reviewed a sample of training records to verify that security personnel re-assigned to support the transition had been trained to successfully implement the site protective strategy.

b. Findings

No findings of significance were identified.

.3 Fitness-for-Duty (FFD) Program (71130.08)

a. Inspection Scope

The inspector evaluated this area by: reviewing program procedures, implementing procedures, and records; conducting interviews with responsible personnel and plant employees; and performing walkdowns.

The inspector verified that: (1) work hour limits had not been exceeded during the transition period as stated in the "Order for Compensatory Measures Related to Fitness-for-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel" (Order); and (2) group work hour limits had not been exceeded during the transition period, as stated in the Order, under normal plant conditions, planned plant or planned security system outages, unplanned plant or unplanned security system outages, increases in plant threat condition, and during force-on-force exercises.

The inspector conducted the following specific inspection activities:

- reviewed a sample of daily manpower worksheets to verify individual work hour limits were not exceeded during the transition period;
- reviewed a sample of security officers pay records to verify individual work hour limits were not exceeded during the transition period;
- reviewed the group work hour report to verify group work hours were not exceeded during the transition period; and
- reviewed the transition plan to verify the dates and time period of the transition.

b. Findings

No findings of significance were identified.

4. Security Training (71130.07)

a. Inspection Scope

The inspector evaluated this area by: reviewing program procedures, implementing procedures, and records; and conducting interviews with responsible personnel and plant employees.

The inspector verified that: (1) new security officers or other individuals hired or re-assigned to support the transition met the requirements of the licensee's security training and qualification program in accordance with NRC-approved security plans, regulatory requirements, and any other applicable Commission requirements; and (2) any changes to the licensee's security training and qualification program as a result of the transition did not decrease the effectiveness of the training program or reduce the effectiveness of the NRC-approved security plan or the overall implementation of the security program.

The inspector conducted the following specific inspection activities:

- reviewed task specific performance requirements to verify that the training was appropriate for the task;
- reviewed a sample of training records to verify that security personnel re-assigned to support the transition had been trained to successfully implement the site protective strategy; and
- reviewed a sample of training records to verify that personnel re-assigned to support the transition had been trained and were fully qualified to perform appointed duties.

b. Findings

No findings of significance were identified.

5 Security Plan Changes

a. Inspection Scope

The inspector evaluated this area by: reviewing program procedures, implementing procedures, and records; and conducting interviews with responsible personnel and plant employees.

The inspector verified that changes to the licensee's NRC-approved security plans and implementing procedures had not decreased the effectiveness of the previous plan by (1) reviewing any changes to the security plan as a result of the transition; and (2) verifying that any other changes made as a result of the transition were implemented in accordance with the NRC-approved security plans, regulatory requirements, or any other applicable Commission requirements.

The inspector conducted the following specific inspection activities:

- reviewed the transition plan to determine whether Security Plan changes were properly approved and implemented;
- reviewed the Physical Security Plan to determine whether changes were properly approved and implemented; and
- interviewed security management personnel to determine whether changes were properly approved and implemented.

b. Findings

No findings of significance were identified.

6 Licensee Strike Contingency Plans

a. Inspection Scope

Because the contract with the security force did not expire before the transition was completed, this area was not reviewed.

b. Findings

No findings of significance were identified.

7 Identification and Resolution of Problems

a. Inspection Scope

The inspector evaluated this area by: reviewing program procedures, implementing procedures, and records; and conducting interviews with responsible personnel and plant employees.

The inspector conducted interviews of security officers and supervisory security officers to determine whether an environment existed in which employees felt free to raise safety concerns, both to their management and to the NRC, without fear of retaliation and whether such concerns are promptly reviewed, given the proper priority based on their potential significance, and appropriately resolved with timely feedback.

b. Findings

No findings of significance were identified.

40A6 Meetings

Exit Meeting

The inspectors presented the inspection results to Mr. F. A. Kearney and other members of licensee management at the conclusion of the inspection on April 18, 2008. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

F. Kearney, Site Vice President
M. Kanavos, Plant Manager
M. Hiter, Security Analyst
S. Gackstetter, Regulatory Assurance Manager
J. Rappeport, Chemistry Manager
J. Waddell, Security Supervisor
C. Williamson, Security Manager

Nuclear Regulatory Commission

D. Lords, Resident Inspector
B. Cushman, Resident Inspector

Illinois Emergency Management Agency

S. Mischke

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened, Closed, and Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector reviewed the documents in their entirety but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document, or any part of it, unless this is stated in the body of the inspection report.

S02 Access Control (71130.02)

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|--------------------|---|---------------------------|
| | Clinton Power Station Security Plan (SGI) | 3 |
| SY-AA-101-107 | Control and Confiscation of Contraband or Prohibited Items | 5 |
| SY-AA-101-110 | Maintaining Search Integrity between Stations | 4 |
| SY-AA-101-111-1002 | Guidance Document for the Implementation of Safeguards Advisory Actions | 6 |
| SY-AA-101-112 | Searching Personnel, Vehicles, Packages, and Cargo | 13 |
| SY-AA-101-113 | Escorting Personnel and Vehicles | 6 |
| SY-AA-101-114 | Processing Emergency Response Vehicles and Personnel | 4 |
| SY-AA-101-115 | Controlling Gates | 5 |
| SY-AA-101-117 | Routine Processing and Escorting of Personnel and Vehicles | 15 |
| SY-AA-101-118 | Control of Badges | 2 |
| SY-AA-101-119 | Control of Receiving Warehouses | 3 |
| SY-AA-101-120 | Control of Security Keys and Cores | 2 |
| SY-AA-101-120 | Attachment 1, Key Issuance Log | April, 2007 – April, 2008 |
| SY-AA-101-120 | Attachment 2, Key Inventory | April 9, 2008 |
| SY-AA-101-123 | Searching Vehicles and Cargo/Material | 8 |
| SY-AA-1013 | General Guidance for Use of the Itemiser 3 Explosive Detector | 2 |
| SY-AA-103-511 | Request for Unescorted Access | 17 |
| SY-AA-150-1001 | Proficiency Challenge Report (Sample) | Figure 4-7 |
| SY-AA-150-1001 | Non-Member/Temporary Member of the Security Organization Individual Qualification Record (Sample) | Figure 5-5 |
| 698609-03 | Focused Area Self-Assessment (FASA) Access Control and Fitness-for-Duty | April 1, 2008 |

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|----------------------------|
| | Security Key Inventory; Non-Issued P Key and Cores | March 18, 2008 |
| | Security Key Inventory; V and P Key Inventory | March 18, 2008 |
| LS-AA-125 | Corrective Action Program (CAP) Procedure | 11 |
| | Corrective Action Program Reports (Security-Related) | November 2007 – March 2008 |
| AR 00746747 | Visitors Left at the Catchers Mitt Unescorted | March 8, 2008 |
| AR 00764600 | Enhancement to Package Searches Via Blue Warehouse (NRC Identified) | April 17, 2008 |
| | Security Event Reports (SER) | November 2007 – March 2008 |

S08 Fitness-for-Duty Program (71130.08)

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------|---|-------------------------|
| | Clinton Power Station Security Plan (SGI) | 3 |
| SY-AA-101-1002 | Procedure Approval Form: Attachment 1 | 5 |
| SY-AA-101-135 | Exelon Nuclear Security Work Hour Controls | 2 |
| SY-AA-101-135 | Fatigue/FFD Evaluation Record, Attachment 2 | 2 |
| SY-AA-102 | Exelon's Nuclear Fitness-for-Duty Program | 11 |
| SY-AA-102-201 | Callout's for Unscheduled Work | 6 |
| SY-AA-102-202 | Testing for Cause | 11 |
| SY-AA-102-203 | Follow-Up Testing | 5 |
| SY-AA-102-204 | Random Selection & Notification Process | 8 |
| SY-AA-102-205 | Fitness-for-Duty (FFD) Appeal | 6 |
| SY-AA-102-206 | Reporting Use of Medication | 6 |
| SY-AA-102-208 | Notification of Fitness-for-Duty (FFD) Test Results | 6 |
| SY-AA-102-220 | Reporting of Significant Fitness-for-Duty (FFD) Events | 4 |
| SY-AA-102-221 | Processing Fitness-for-Duty (FFD) Allegations | 3 |
| SY-AA-102-222 | Handling and Storage of Fitness-for-Duty (FFD) Records | 5 |
| SY-AA-102-223 | Handling Suitable Inquiries and Associated Fitness-for-Duty (FFD) Records | 3 |

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------|---|-------------------------|
| SY-AA-102-224 | Work Performance Investigation | 3 |
| SY-AA-102-225 | Fitness-for-Duty (FFD) Screening Process | 4 |
| SY-AA-102-226 | Tests Results and MRO Response | 7 |
| SY-AA-102-227 | Qualification of Emergency Operations Facility Participants | 5 |
| SY-AA-102-229 | Issuing and Documenting Acceptance of the Exelon FFD and Unescorted Access Program Requirements for Contractors and Vendors | 6 |
| SY-AA-102-229 | Attachment 1 - Ten (10) Contractor/Vendor FFD Agreements | |
| SY-AA-102-230 | Security of Collection Facilities | 4 |
| SY-AA-102-231 | Handling, Use and Storage of the Permanent Record Book | 4 |
| SY-AA-102-240 | Collection of Urine in an Exelon Facility | 8 |
| SY-AA-102-241 | Collection of Blood in the Collection Facility | 4 |
| SY-AA-102-242 | Alco Sensor IV and RBT IV Red Dot Numeric Keypad Printer; Breath Alcohol Testing | 5 |
| SY-AA-102-243 | Urine Collection in a Temporary Collection Site | 4 |
| SY-AA-102-244 | On-Site Collection Facility Quality Control Program | 4 |
| SY-AA-102-245 | Calibration of Alco-Sensor and Alco-Monitor Equipment | 7 |
| SY-AA-102-245 | Attachment 1, Alco-Sensor and Alcomonitor Calibration Check/Calibration Log | 7 |
| SY-AA-102-247 | Refractometer Calibration and Use | 3 |
| SY-AA-102-247 | Attachment 1, Refractometer Calibration Log | 3 |
| SY-AA-102-248 | Laboratory Blind Performance Test Specimens | 3 |
| SY-AA-102-249 | Transmittal of Specimens | 3 |
| SY-AA-103-513 | Behavioral Observation Program | 6 |
| SY-AA-103-509 | Protection of Personal Information | 2 |
| SY-AA-150-1001 | Security Required Reading Record | 3 |
| TQ-AA-118-0108 | NGET WBT Agreement for Exam Proctors | 2 |
| TQ-AA-118-0109 | NGET Examination Cover Sheet | 1 |
| TQ-AA-210-4105 | Plateau LMS Course Attendance Sheet | 3 |
| TQ-AA-210-4105 | Course Code Attendance Sign-In Log | 2 |

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------|---|--|
| TQ-AA-224-F080 | Training Observation Form | 0 |
| AR 717574 | Security Plan, FFD, Access Authorization, and PADS Audit NOSA-NCS-08-02 (AR 717574); Audit Period January 28 – February 1, 2008 | January 18, 2008 |
| AR 574309 | Nuclear Oversight Corporate Comparative Audit Report NOSA-NCS-07-03 | January 29, 2007 – February 16, 2007 |
| AR 441347 | Cantera and Kennett Square Security Plan, FFD, and PADS Audit NOSA-NCS-06-02 | January 23, 2006 – January 27, 2006 |
| AR-713022 | Security Plan, FFD, and Access Authorization Audit Report NOSA-LAS-08-02 | February 4 – 15, 2008 |
| | Random Listing of Badged Personnel | April 4, 2008 |
| | Exelon Nuclear Drug Testing Custody and Control Log, Form A/23 | March 2007 |
| | Employee Assistance Program (EAP) Contract | February 1, 2006 |
| | Exelon Listing of Contractor/Vendor | |
| | Exelon Security Organization Line Diagram | |
| | Exelon Fitness-for-Duty Performance Data Reports | First Period 2006 thru First Period 2007 |
| | Exelon Fitness-for-Duty Performance Data Reports | August 9, 2007 and February 25, 2008 |
| | Clinton Instructor Proctor Codes | April 16, 2008 |
| 9231538 | American Association of Medical Review Officers (MRO) Verification of Certification | May 4, 2005 |
| | Access Authorization File for Exelon MRO | |
| | Access Authorization Implementation Testing Rate Issue; Basis and Formulas for Random Generator | |
| | Wackenhut Policy and Procedure Manual, No. 107 Attendance | 2 |
| | Wackenhut Nuclear Services - Nuclear Group Work Hours Tracking Report - User's Manual | 2 |
| | Wackenhut Work Hours Tracking Form Instructions | |
| | Wackenhut Nuclear Services - Nuclear Group Work Hours Tracking Report | April 2007 - April 2008 |

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|---------------------------|
| | Nuclear General Employee Training (NGET) Study Guide | 33 |
| | NGET Completion Dates Cantera | |
| | POST Personnel – Midwest FFD/ Behavior Observation Program (BOP) Training | |
| LP-92 | Fitness-for-Duty Enhancement Training for Nuclear Security Supervisors | |
| | BOP Annual Supervisor Review Samples | |
| 698609-03 | Focused Area Self-Assessment (FASA) Access Control and Fitness-for-Duty | April 1, 2008 |
| NEI 06-11 | Managing Fatigue at Nuclear Power Reactor Sites | A |
| | Corrective Action Program Reports (Security-Related) | January 2007 - March 2008 |
| | SERs | January 2007 - March 2008 |

40A1 Performance Indicator Verification (71151)

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|------------------------------|
| NEI 99-02 | Regulatory Assessment Performance Indicator Guideline | 5 |
| LS-AA-2160 | Monthly (PI) Data Elements for Protected A Security Equipment Performance Index | 4 |
| LS-AA-2170 | Monthly (PI) Data Elements for Personnel Screening Program Performance | 4 |
| LS-AA-2180 | Monthly (PI) Data Elements for Fitness-for-Duty/Personnel Reliability Program Performance | 4 |
| SY-AA-1002 | Safeguards Event Reports | 0 |
| | Exelon Security Monthly Performance Indicator Summary Report | January 2007 – March 2008 |
| | Nuclear Security Performance Summary Report | January 2007 – February 2008 |
| | FFD Performance Indicator Positive Test Report | January 2007 – December 2007 |
| | SERs | April 2007 – March 2008 |

40A5 Transition of Contract Security to Proprietary Security Force (TI 2201/002)

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|------------------------------|
| | Exelon Nuclear Security Force Transition NRC Brief | January 11, 2008 |
| | Clinton Security Transition Plan | |
| | Talking Points for Security Managers | January 11, 2008 |
| | Exelon Supervisory Brief | February 12, 2008 |
| | Talking Points for Fleet Security Managers | February 18, 2008 |
| | Contingency Force Staffing Plan | February 19, 2008 |
| | 15 Access Authorization Records/ Associated Chemical Test Results | |
| | Clinton Power Station Security Plan (SGI) | 3 |
| | Clinton Power Station Security Roster | |
| | 15 Security Training Records | |
| | New hire On-the-Job and Crew Preference | |
| SY-AA-101-135 | Exelon Nuclear Security Work Hour Controls | 2 |
| | Security Force Group Work Hours | January 2007 – March 2008 |
| | SERs | April 2007 – March 2008 |
| | 15 Security Training Records | |
| 754163-02 | Check-In Self-Assessment Report - Inspection of Transition of Contract Security to a Proprietary Security Force | April 11, 2008 |

LIST OF ACRONYMS USED

| | |
|------|-------------------------------|
| CAP | Corrective Action Program |
| CFR | Code of Federal Regulations |
| DRS | Division of Reactor Safety |
| FASA | Focus Area Self-Assessment |
| FFD | Fitness-for-Duty |
| NOS | Nuclear Oversight |
| NRC | Nuclear Regulatory Commission |
| OCA | Owner-Controlled Area |
| PI | Performance Indicator |
| SER | Security Event Reports |