

Release all - proposed regulations are not justified info available in NRC regulations

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December 7, 2007

Mr. Charles G. Pardee
Chief Nuclear Officer (CNO) and
Senior Vice President
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville IL 60555

**SUBJECT: CLINTON POWER STATION
NRC SECURITY BASELINE INSPECTION REPORT 05000461/2007403(DRS)**

Dear Mr. Pardee:

On October 26, 2007, 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 October 26, 2007, with Mr. B. Hanson and on January 12, 2007, with Mr. G. Kaegi and other members of your staff.

This 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 inspectors 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

EXEMPT FROM PUBLIC DISCLOSURE
May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)
Exemption number: <u>5</u>
Nuclear Regulatory Commission review required before public release.
<u>D. Funk, RIII/DRS/PSB</u>
Name and organization of person making determination.
Date of determination: <u>11/02/07</u>

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A/3

C. Pardee

-2-

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.

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 No. 50-461
License No. NPF-62

Nonpublic Enclosure: Inspection Report 05000461/2007403(DRS)
w/Attachment: Supplemental Information

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

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C. Pardee

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SEE PREVIOUS CONCURRENCES

DOCUMENT NAME: G:\DRS\Work in Progress\CLI 2007 403 DRS OUO.wpd

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Letter to Charles G. Pardee from Eric Duncan dated December 7, 2007.

**SUBJECT: CLINTON POWER STATION
NRC SECURITY BASELINE INSPECTION REPORT 05000461/2007403(DRS)**

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

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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
Senior Vice President – Midwest Operations
Senior Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Manager Licensing – Clinton, Dresden and Quad Cities
Associate General Counsel
Document Control Desk - Licensing
Assistant Attorney General
Illinois Emergency Management Agency
Chairman, Illinois Commerce Commission
Illinois Emergency Management Agency
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-461
License No: NPF-62

Report No: 05000461/2007403(DRS)

Licensee: Exelon Generation Company, LLC

Facility: Exelon Nuclear Corporate
Clinton Power Station

Location: Warrenville, IL
Clinton, IL

Dates: January 17 through 19, 2007
October 22 through 26, 2007

Inspectors: D. Funk, Sr. Project Specialist
J. Maynen, Sr. Physical Security Inspector
G. Hansen, Physical Security Inspector
J. Kutlesa, Physical Security Inspector In-Training

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

Enclosure

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SUMMARY OF FINDINGS

IR 05000461/2007403(DRS); 01/17/2007 - 01/19/2007, Exelon Nuclear Corporate;
10/22/2007 - 10/26/2007; Clinton Power Station; Routine Security Baseline Inspection.

This report covers a 2-week period of announced baseline inspection on security. The inspection was conducted by four Region III physical security inspectors. 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

S01 Access Authorization (71130.01)

a. Inspection Scope

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

The inspectors verified the licensee's access authorization program: (1) complied with the NRC-approved security plan and any other applicable Commission requirements; (2) provided high assurance that personnel granted unescorted access were trustworthy, reliable, and did not constitute an unreasonable risk to public health and safety, including the potential to commit radiological sabotage; (3) established a behavioral observation program that provided high assurance of continued reliability and trustworthiness of personnel with unescorted access; and (4) implemented the provisions of the insider mitigation program to effectively mitigate against the active and active violent insider.

The inspectors conducted the following specific inspection activities:

- reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents dated between October 2006 and October 2007 (no licensee event reports were documented).
- verified for access authorization implementing procedures that the licensee:
 - (a) implemented a method to ensure all individuals who maintain unescorted access to the protected area, including supervisors and escorts, receive behavior observation training;
 - (b) developed and implemented procedures and processes for all categories of unescorted access;
 - (c) developed and implemented procedures that provide details on behavioral observation training;
 - (d) developed and implemented procedures that describe how the licensee protects personal information maintained in the licensee's personnel information management system and that the records on which the access authorization is based or denied for the duration of the unescorted access or for 5 years following access denial or access termination;
 - (e) developed, implemented and maintains procedures to ensure that personnel denied unescorted access after January 1, 1997, are included in a common industry database;
 - (f) developed, implemented and maintains procedures to ensure that individuals performing background investigations have met criteria that are consistent with the requirements for persons undergoing background investigations; and
 - (g) developed and implemented and maintains procedures and training for ensuring that persons granted unescorted access are aware and remain aware of their responsibility to

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report arrests, are knowledgeable about the elements of the behavioral observation program, and are notified in writing of their responsibilities.

- verified for granting unescorted access that the licensee: (a) developed, implemented and maintained access authorization categories and processes for determinations regarding initial unescorted access, updated unescorted access, and reinstatement of unescorted access; (b) implemented adequate provisions to obtain sufficient information to determine the true identity of applicants for unescorted access; (c) conducted employment and/or education verifications and suitable inquiries within the required time constraints; (d) required applicants to undergo professionally accepted and standardized psychological evaluations as required; (e) ensured that any psychological abnormality identified during the process resulted in a clinical review by a licensed psychologist or psychiatrist and, as applicable, a medical review by a medical practitioner; (f) reviewed and evaluated the FBI criminal history record before authorizing unescorted access; (g) conducted an assessment of trustworthiness and reliability before authorizing unescorted access; (h) reviewed credit history summaries for the entire period covered by the credit history summary; (i) implemented extended inquiries for credit history summaries to determine fraud or misuse of social security numbers or other financial identifiers; (j) compared the data in the credit history summary with information contained in the applicant's personal history questionnaire to validate the information provided by the applicant; (k) appropriately implemented the standard of best effort associated with verification of past or present employment information of the applicant; (l) appropriately implemented the requirements for submitting fingerprints, including the restrictions on requesting name searches; (m) effectively implemented a pre-access testing program for persons requesting unescorted access and a random drug and alcohol testing program for persons maintaining unescorted access; and (n) conducted a holistic review of the information developed in making an access authorization decision.
- verified for maintaining authorization that the licensee had provisions in place to reassess and reevaluate, on the day of discovery, information received by or provided to the licensee that may have had an effect on the trustworthiness or reliability of a person with unescorted access authorization.
- verified for the common industry database that the licensee: (a) developed, implemented and maintained a method to ensure individuals who have unescorted access authorization are identifiable in an industry wide database which is accessible by other NRC-licensed facilities; (b) included in the industry wide database personnel who have been denied access for a certain period; (c) developed, implemented and maintained procedures to ensure that personnel who are denied access have been included in an industry wide database; (d) implemented measures to ensure the timely entry of information needed for a licensee to make an informed access authorization decision; (e) denies access to the protected area to personnel who have been denied access based on NRC

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requirements; (f) ensured that personnel with unescorted access authorization who are in a licensee or contractor/vendor follow up program are identified to enable continuation of the follow up activities by the receiving licensee; (g) developed, implemented and maintained backup manual procedures and processes for sharing information; and (h) ensured that personnel potentially affected by any licensee violation of any 10 CFR Part 26 program element are identified to any licensee having taken credit for the activities of the licensee in violation and to any licensee who may attempt to take credit for the activities of the licensee in violation.

- verified for the reinvestigations that the licensee: (a) performed reinvestigation of all personnel having unescorted access to NRC-licensed facilities as required; and (b) developed, implemented and maintained criteria for individuals performing background investigations and that the criteria was consistent with the requirements for those undergoing background investigations.
- verified for the insider threat and mitigation that the licensee: (a) reassessed and re-approved personnel access lists for vital areas at the prescribed frequency to confirm that personnel on the vital area access list have a continued need to access vital areas; (b) screened individuals on personnel access lists to ensure that they have a "continued need" for access to vital areas, not just a possibility of needing unescorted access at some undefined time in the future; (c) implemented provisions for conducting psychological reassessments for critical group members at intervals not to exceed 5 years; (d) implemented provisions for conducting and reviewing annual supervisory reviews; (e) maintained a training program for security personnel that ensures security personnel recognize obvious indications of tampering, and that these conditions are reported in a timely manner and compensated where appropriate; and (f) maintained a training program for operations personnel that ensures personnel are alert to changes in configurations that indicate possible tampering and that these conditions are reported in a timely manner and compensated where appropriate.
- verified for the licensee's behavioral observation program that the licensee: (a) designed its program to ensure recognition of behaviors adverse to the safe operation and security of the facility; (b) documented behavioral observation program training and refresher training; (c) established provisions for initial and annual re-qualification behavior observation training for both the employees and their supervisors that are off-site to maintain unescorted access; and (d) included a method to validate the implementation of the licensee's behavior observation program for off-site employees who maintain unescorted access.
- verified for its personnel information management system that the licensee: (a) developed, implemented and maintained a personnel information management system to protect personal and confidential information; (b) provided protection of information stored or transmitted in electronic format; and

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(c) designed its system to prohibit unauthorized access to the information and to prohibit modification of the data without proper authorization.

- verified for safeguards information that the licensee: (a) developed and implemented procedures to control access authorization to safeguards information; and (b) if appropriate, developed and implemented procedures to control access authorization to safeguards information at contractor facilities.

The inspectors reviewed access authorization 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 48 of the required 48 samples.

b. Findings

No findings of significance were identified.

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 of the personnel, package, and vehicle access points into the protected area.

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 ensured that only those personnel who have been properly screened were 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 October 2006 to October 2007 (no licensee event reports were documented);
- 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: (a) the licensee manually controls access to vital areas when electronic controls are not in service;
- 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 impact 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 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.

This inspection completed 16 of the required 16 samples.

a. Findings

No findings of significance were identified.

S05 Protective Strategy Evaluation (71130.05)

a. Inspection Scope

The inspectors evaluated this area by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and performing walk downs of defensive positions, areas of attack, and the protected area.

The inspectors verified that the protective strategy: (1) complied with the NRC-approved security plan and any other applicable Commission requirements; and (2) was being effectively implemented and provided reasonable assurance of protecting certain vital equipment and critical personnel assets from the Design Basis Threat (DBT).

The inspectors conducted the following specific inspection activities:

- reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents dated between October 2006 and October 2007 (no licensee event reports were documented);
- verified for the protective strategy established to defend against the DBT that the licensee: (a) documented the response plan and implementing procedures; (b) evaluated for adverse impact on plant operations; (c) maintained appropriate target sets; (d) designed the strategy to protect against the specified characteristics; (e) designed the strategy to protect against the specified weapons; (f) designed the strategy to protect against the specified equipment, tools, and incapacitating agents; (g) designed the strategy to protect against the land vehicles; (h) designed the strategy to protect against the insider threat; (i) designed the strategy to protect against the vehicle bomb attack; (j) designed the strategy to protect against a waterborne assault, if necessary; and (k) verified support and response capabilities of local law enforcement agencies;
- reviewed the records of response drill performance to verify licensee's continuing capabilities and to identify issues that may represent uncorrected performance weaknesses or program vulnerabilities;
- verified as part of the protective strategy assessment that the licensee: (a) implemented measures to protect intake structures from water vessels, if necessary; (b) implemented surveillance measures, as necessary, at intake structures; (c) implemented vehicle barrier systems to protect specific assets from a vehicle bomb; (d) implemented training for appropriate plant personnel on hostage and duress situations; (e) maintained the required number of armed responders; (f) maintained appropriate defensive positions; (g) assessed the deployment of excess armed responders; (h) included all elements of the target set analysis; (i) ensured armed responders have ready access to contingency equipment; (j) restricted access, as necessary, to exterior portals; (k) developed

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an integrated response plan with law enforcement agencies; and (l) ensured plant operations staff participation in defining and validating the protective strategy.

The inspectors routinely reviewed protective strategy evaluation 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 30 of the required 30 samples.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA6 Meetings

.1 Exit Meeting

The inspectors presented the inspection results to Mr. B. Hanson and other members of licensee management at the conclusion of the on-site inspection on October 26, 2007. The inspectors asked the licensee if 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

- B. Hanson, Site Vice President
- W. Beck, Regulatory Assurance Manager
- D. Boyles, Operations Support Manager
- B. Briscoe, Non-Accredited Instructor
- J. Burkhead, Nuclear Oversight
- D. Evans, Exelon Corporate Manager, Security Operations
- R. Frantz, Regulatory Assurance
- S. Hart, Wackenhut Project Manager
- G. Kaegi, Exelon Director, Nuclear Security
- D. Moore, Nuclear Oversight Manager
- J. Ottens, Security Analyst
- D. Ragan, Wackenhut Operations Coordinator
- J. Schrage, Exelon, Licensing
- S. Techau, Exelon Manager, FFD/AA
- D. Walker, Exelon Corporate Security Specialist
- C. Williamson, Security Manager

Nuclear Regulatory Commission

- B. Dickson, Senior Resident Inspector
- D. Tharp, Resident Inspector

Illinois Emergency Management Agency

- S. Mischke, Resident Inspector

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 inspectors 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.

S01 Access Authorization (71130.01)

NEI 03-01; Nuclear Power Plant Access Authorization Program; Revision 1; dated April 2004

SY-AA-103-500; Access Authorization Program; Revision 8

SY-AA-103-501; Access Authorization Categories and Requirements; Revision 7

SY-AA-103-502; Processing of Personnel History Questionnaires; Revision 6

SY-AA-103-503; Psychological Assessments; Revision 5

SY-AA-103-504; Review of Background Investigation and Unescorted Access Denial Appeal; Revision 7

SY-AA-103-506; Utilizing the Personnel Access Data System (PADS); Revision 9

SY-AA-103-508; Conducting Background Investigation; Revision 4

SY-AA-103-509; Protection of Personal Information; Revision 3

SY-AA-103-510; Critical Group Security Requirements; Revision 0

SY-AA-103-511; Request for Unescorted Access; Revision 17

SY-AA-103-513; Behavioral Observation Program; Revision 6

SY-AA-103-514; Fabrication of Security Badges; Revision 13

SY-AA-103-517; Inprocessing Personnel (Employee and Contractor); Revision 5

SY-AA-103-518; Outprocessing of Personnel (Employee and Contractor); Revision 10

SY-AA-101-106; Control and Classification of Safeguards Information; Revision 8

SY-AA-101-106-1001; Power Point Safeguards Information; Revision 3

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SY-AA-101-106-1002; Use of Encryption Software for Safeguards Information;
Revision 0

Exelon Self-Disclosure Personal History Questionnaire for Unescorted Access

Exelon Initial Personal History Questionnaire for Unescorted Access

Exelon Reinstatement Personal History Questionnaire for Unescorted Access

Exelon Update Personal History Questionnaire for Unescorted Access

Corporate - Cantera and Kennett Square Security Plan, FFD and PADS Audit
NOSA-NCS-06-02 (AR 441347) January 23 - 27, 2006

Security Frequently Asked Questions (SFAQ) SFAQ 05-15 Verification Best Efforts

Exelon - West Denial Listing Any Reason 2005 -2006.

Randomly Selected Access Authorization Files (Initial, Reinstatement, Update)

All Critical Group Individual Listing (Clinton); dated October 17, 2007

Access Levels All Persons sorted by Company/Department; dated October 18, 2007

Nuclear - General Employee Training Manual; Revision 33

Nuclear Requalification Plant Access Training N-GET (Clinton); dated October 17, 2007

TQ-AA-118; Nuclear General Employee Training – NGET; Revision 7

TQ-AA-201; Examination Security and Administration; Revision 9

TQ-AA-118-0108; NGET WBT Agreement for Exam Proctors

CPS Web Based NGET Proctor List

Exelon - NGET Fitness-for-Duty; dated July 1, 2007

Security Plan, FFD, and Access Authorization Audit Report NOSA-CPS-07-03
(AR 569192) Clinton Station; dated February 5 - 9, 2007

Self-Assessment Assignment # 563081-04; Security Pre-NRC Check-In Self-Assessment
in the Areas of Access Authorization, Access Control and Protective Strategy; dated
September 14, 2007

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Corrective Action Program Reports (Security-Related); October 2006 - October 2007

Security Event Reports (SER); October 2006 - October 2007

S02 Access Control (71130.02)

Clinton Power Station Security Plan; Revision 3; dated April 2007

SY-AA-101-107; Control and Confiscation of Contraband or Prohibited Items; Revision 4

SY-AA-101-110; Maintaining Search Integrity between Stations; Revision 6

SY-AA-101-112; Searching Personnel and Packages; Revision 12

SY-AA-101-113; Escorting Personnel and Vehicles; Revision 6

SY-AA-101-117; Processing Visitors and Vehicles; Revision 14

SY-AA-101-118; Control of Badges; Revision 2

SY-AA-101-119; Control of Receiving Warehouses; Revision 3

SY-AA-101-120; Control of Security Keys and Cores; Revision 2

SY-AA-101-123; Searching Vehicles and Cargo/Material; Revision 8

SY-AA-101-111-1002; Guidance Document for the Implementation of Safeguards Advisory Actions; Revision 6

Post Orders (PO) SY-CL-101-2000 F06; Detection Lane #1 and 2; Revision 0

Security Key and Core Change Worksheet; dated March 28, 2007

V and P Key Locations

Memorandum of Understanding - DeWitt County Sheriff Department; dated January 8, 2007

Self-Assessment Assignment # 563081-04; Security Pre-NRC Check-In Self-Assessment in the Areas of Access Authorization, Access Control and Protective Strategy; dated September 14, 2007

LS-AA-125; Corrective Action Program (CAP) Procedure; Revision 9

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Corrective Action Program Reports (Security Related); October 2006 - October 2007

SERs; October 2006 - October 2007

S05 Protective Strategy (71130.05)

Clinton Power Station Security Plan; Revision 3; dated April 2007

SY-AA-101-133; Integrated Response Plan with Off-site Response Agencies; Revision 6

SY-AA-1004; Hostage/Duress Situations; Revision 0

SY-AA-1016; Watch-Standing Practices; Revision 5

SY-AA-1020; Supervisor Post Checks and Post Orders; Revision 1

Contingency Equipment Inventory Logs; dated October 15 - 21, 2007

Equipment Tour Checklists; dated October 15 - 24, 2007

Behavior Observation Program (BOP) - Annual Supervisor Review Worksheet

Self-Assessment-Assignment # 563081-04; Security Pre-NRC Check-In Self-Assessment in the Areas of Access Authorization, Access Control and Protective Strategy; dated September 14, 2007

LS-AA-125; Corrective Action Program (CAP) Procedure; Revision 9

Corrective Action Program Reports (Security-Related); dated October 2006 - October 2007

SERs; dated October 2006 - October 2007

LIST OF ACRONYMS USED

DRS	Division of Reactor Safety
FASA	Focus Area Self-Assessment
FFD	Fitness-for-Duty
FOF	Force-on-Force
IQT	Individual Qualification Test
NRC	Nuclear Regulatory Commission
SG	Security Guideline
SER	Security Event Report