

~~OFFICIAL USE ONLY - SECURITY-RELATED INFORMATION~~

November 19, 2008

EA 08-284

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

SUBJECT: CLINTON POWER STATION
NRC SECURITY BASELINE INSPECTION REPORT 05000461/2008403(DRS);
PRELIMINARY GREATER THAN GREEN FINDING

Dear Mr. Pardee:

On October 27, 2008, the U.S. Nuclear Regulatory Commission (NRC) completed a security baseline inspection at your Clinton Power Station. 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 27, 2008, with Mr. F. 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 inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

The attached report documents a finding that has the potential for significance of greater than very low security significance (i.e., greater than Green as determined by the Physical Protection Significance Determination Process). The final resolution of this finding will convey the increment in the importance to safety by assigning the corresponding color. The deficiencies were promptly corrected or compensated for, and the plant was in compliance with applicable physical protection and security requirements within the scope of this inspection before the inspectors left the site. The finding had a cross-cutting aspect in the area of Human Performance, Resources, [H.2(c)] because the licensee failed to maintain complete, accurate, and up-to-date procedures.

The finding was self-revealing. The finding is also an Apparent Violation (AV) of NRC requirements and is being considered for escalated enforcement action in accordance with the enforcement policy, which can be found on the NRC's web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

~~Enclosure transmitted herewith contains Sensitive Unclassified Non-Safeguards Information. When separated from enclosure, this transmittal document is decontrolled.~~

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C. Pardee

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In accordance with Inspection Manual Chapter (IMC) 0609, Significance Determination Process (SDP), we intend to complete our evaluation using the best available information and issue our final determination of security significance within 90 days of the date of this letter.

The significance determination process encourages an open dialog between the staff and the licensee; however, the dialogue should not impact the timeliness of the staff's final significance determination. Before we make a final decision on this matter, we are providing you an opportunity: (1) to present to the NRC your perspectives on the facts and assumptions, used by the NRC to arrive at the finding and its significance, at a Regulatory Conference; or (2) submit your position on the finding to the NRC in writing. If you decline to request a Regulatory Conference or submit a written response, your ability to appeal the final SDP determination can be affected, in that by not doing either, you fail to meet the appeal requirements stated in the Prerequisite and Limitation sections of Attachment 2 of IMC 0609.

If you request a Regulatory Conference, it should be held within 30 days of the receipt of this letter and we encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. In the interest of protecting sensitive, security-related information, if a Regulatory Conference is held, it will not be open for public observation. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of the receipt of this letter. Because this issue involves security-related information, if you choose to respond, your response will not be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21. Otherwise, mark your entire response "Security-Related Information - Withhold Under 10 CFR 2.390" and follow the instructions for withholding in 10 CFR 2.390(b)(1).

Please contact Eric Duncan, Chief, Plant Support Branch at (630) 829-9757 within 10 business days of the date of your receipt of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination and enforcement decision and you will be advised by separate correspondence of the results of our deliberations on this matter.

Since the NRC has not made a final determination in this matter, no Notice of Violation is being issued for this inspection finding at this time. In addition, please be advised that the number and characterization of the AV described in the enclosed inspection report may change as a result of further NRC review.

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 Agency wide 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.

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 by Anne Boland for/

Steve West, Director
Division of Reactor Safety

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

Nonpublic Enclosure: Inspection Report 05000461/2008403(DRS);
w/Attachment: Supplemental Information

cc w/encl: D. Riffle, NSIR/DSO/DDSO
J. Klinger, State Liaison Officer,
Illinois Emergency Management Agency
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

C. Pardee

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Sincerely,

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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

DOCUMENT NAME: G:\DRS\Work in Progress\CLI 2008 403 DRS OUO.doc

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 05000461
License Nos: NPF-62

Report No: 05000461/2008403(DRS)

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, IL

Dates: September 22 through 26, 2008
October 27, 2008

Inspectors: D. Funk, Sr. Projects Specialist
T. Eck, Physical Security Inspector

Approved by: Steve West, Director
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000461/2008403(DRS); 09/22/2008 – 09/26/2008; October 27, 2008;
Clinton Power Station; Routine Security Baseline Inspection; Identification and Resolution of Problems.

This report covers a 1 week period of announced routine baseline inspection on security. The inspection was conducted by two Region III physical security inspectors. One apparent violation (AV) with the potential security significance of greater than Green was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be "Green" or be assigned a severity level after NRC management review. 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

TBD. An apparent violation, with the potential security significance of greater than Green, was identified for the failure to properly store Safeguards Information (SG) while unattended. Security staff, while discussing staffing numbers which prompted a need to reference a new revision of a Security Training Lesson Plan (LP), recognized that the document in the [redacted] was a previous revision. The Security Shift Supervisor (SSS) then realized that the current revision had been inadvertently combined with non-safeguards information that was removed from the [redacted] and placed on a desk in an unsecured office outside the Protected Area (PA) for a 5-day period. The licensee Security Operations Supervisor (SOS) and the SSS took possession of the document and conducted a page count that verified no pages were missing. The SGI document was taken to [redacted] and placed in the SGI binder and recorded on the SGI log. The licensee entered the issue into their corrective action program (AR #00796575) and initiated a prompt investigation and a root cause evaluation. TF

The finding was determined to be more than minor because, if the deficiency was not corrected, it could have led to unauthorized access to Safeguards Information by individuals who did not have a background check and need to know as required by 10 CFR 73.57. Pending determination of security significance, this finding is identified as an apparent violation of 10 CFR 73.21 requirements with the potential security significance of low to moderate. The cause of the finding is related to the cross-cutting area of Human Performance, Resources, [H.2(c)] because the procedure for controlling SGI did not provide the necessary guidance to individuals to ensure that SGI was properly marked and controlled. (Section 40A2.1). DF

B. Licensee-Identified Violations

None.

REPORT DETAILS

3. SAFEGUARDS

Cornerstone: Physical Protection (PP)

S07 Security Training (71130.07)

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 reviewing training drills and exercises.

The inspectors verified that the nuclear security training program: (1) complied with the NRC-approved Training and Qualification Plan; Order EA-03-039, "Issuance of Order for Compensatory Measures Related to Training Enhancements on Tactical and Firearms Proficiency and Physical Fitness Applicable to Armed Nuclear Power Plant Security Force Personnel," dated April 29, 2003 (Training Order); and other regulatory requirements; (2) developed security personnel knowledge, skills and ability and conformed with the Training and Qualification Plan and other regulatory requirements; and (3) ensured equipment assigned to security personnel conformed with the Training and Qualification Plan and other regulatory requirements. The inspectors conducted the following specific inspection activities:

- reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents dated between April 2008 and September 2008;
- verified for the Training and Qualification Plan implementing procedures that the licensee: (a) established policies and procedures for the selection, training, equipping, testing, qualification, and re-qualification of security personnel; (b) compared the protective strategy to the training and qualification program to ensure that armed security personnel were fully trained and qualified; (c) monitored the performance of armed security personnel against established goals and measures; (d) established goals and measures commensurate with the Design Basis Threat; (e) required that security personnel participate in range activities at the prescribed frequency; (f) prevented security personnel from returning to duty when requisite qualification had not been achieved; (g) established a corrective action program for the security training and qualification program; (h) utilized certified firearms instructors; (i) trained security officers regarding their role in supporting safe plant operations; and (j) performed appropriate firing demonstrations;
- verified for initial training that the licensee: (a) ensured personnel were trained, equipped, and qualified to perform each assigned security-related job task or duty; (b) administered a written examination for security personnel as part of the qualification process; (c) included the minimum prescribed elements of the Training Order on the written examination; (d) established a minimum score for written examinations; and (e) trained, equipped, and qualified, as appropriate, non-security or augmented security personnel for their assigned security tasks or duties;

- verified for initial firearms familiarization training that the licensee: (a) conducted the training at the prescribed frequency; and (b) included the eight elements prescribed by the Training Order;
- verified for daylight and night fire qualification training that the licensee: (a) enhanced, as applicable, the daylight firearms training; (b) established acceptable proficiency qualification scores for assigned firearms; (c) enhanced the qualification program for shotguns, when used as contingency weapons; (d) conducted night fire qualification; (e) had officers use each weapon type during night fire qualification; (f) required loading, unloading, and clearing all weapon types during night fire qualification; and (g) established acceptable proficiency scores for night fire qualification (Note: shotguns were not used as contingency weapons);
- verified for tactical qualification that the licensee: (a) developed an appropriate tactical course; (b) included the nine elements prescribed in the Training Order; and (c) established an acceptable proficiency score for tactical qualification;
- verified that security personnel possessed adequate knowledge to carry out their assigned duties and responsibilities, including response procedures, use of deadly force, and armed response tactics;
- verified for tactical response team drills and exercises that the licensee: (a) demonstrated security force capabilities to perform protective strategy responsibilities and individual skills; (b) conducted prescribed tactical drills; and (c) conducted prescribed force-on-force tactical exercises;
- verified for re-qualification training that the licensee: (a) ensured security personnel received required training; (b) included an annual written examination during firearms refresher training; and (c) ensured armed security personnel passed the annual examination prior to resuming duties;
- verified that the licensee maintained training documentation in accordance with the regulations and the requirements outlined in the Training Order; and
- verified for physical fitness qualifications that the licensee: (a) had security personnel demonstrate physical fitness for assigned duties by performing a practical physical exercise program within a specific time period; (b) ensured the Training and Qualification Plan described the performance objectives and included strenuous activity, physical exertion, levels of stress, and exposure to elements for assigned security duties under both normal and emergency operations; (c) required written certification by a licensed physician for each individual's participation in the exercise program; and (d) developed a physical agility test commensurate with the protective strategy.

The inspectors reviewed security training program-related issues during baseline inspection activities to verify that they were being entered into the licensee's corrective

action program 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 41 of the required 41 samples.

b. Findings

No findings of significance were identified.

S09 Owner-Controlled Area Controls (71130.09)

a. Inspection Scope

The inspectors evaluated this area by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and performing walkdowns of the owner-controlled area (OCA) and vehicle checkpoint.

The inspectors verified that the licensee: (1) implemented OCA controls in accordance with the NRC-approved security plan and other applicable regulatory requirements; and (2) ensured that OCA controls provided reasonable protection against the Design Basis Threat.

The inspectors conducted the following inspection activities:

- reviewed and evaluated licensee event reports, safeguards log entries and corrective action documents dated between April 2008 and September 2008 (no licensee event reports were documented);
- verified for OCA controls that the licensee: (a) ensured personnel maintained communication with the alarm stations and validated OCA controls effectiveness through drills or exercises; and (b) actions taken to implement their NRC-approved security plan did not impede the arrival of emergency response personnel or affect implementation of the emergency plan.
- verified for the OCA check point that the licensee, in conformance with the measures specified in their NRC-approved security plan: (a) effectively implemented procedures for controlling plant personnel, vendor, delivery, and visitor access; (b) effectively implemented procedures and controls for channeling vehicles to access control points; and (c) effectively implemented procedures for controlling vehicle entry through the vehicle check point.
- verified for OCA area patrols and surveillance that the licensee: (a) effectively implemented procedures for surveillance activities; (b) ensured personnel on patrol did not perform collateral duties that decreased the effectiveness of their surveillance activities; and (c) effectively implemented applicable procedures for maritime coordination, river intake control, and surveillance; and
- verified for OCA barriers and equipment that the licensee, in conformance with the measures specified in their NRC-approved security plan: (a) effectively implemented controls to limit the potential for unauthorized vehicles and

equipment; and (b) ensured the OCA patrols had the necessary weapons and equipment readily accessible.

The inspectors reviewed OCA controls-related issues during baseline inspection activities to verify that they were being entered into the licensee's corrective action program 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 12 of the required 12 samples.

b. Findings

No findings of significance were identified.

4. **OTHER ACTIVITIES**

4OA1 Follow-up of Events and Notices of Enforcement Discretion (71153)

.1 (Closed) Licensee Event Report (LER) 2008-002-00: Uncontrolled Safeguards Information

A description of the reported event, the inspectors' conclusions, and the associated licensee responses are discussed in Section 4OA2.1 below. This LER is closed.

4OA2 Identification and Resolution of Problems

.1 Failure to Properly Store Safeguards Information While Unattended

Introduction: An apparent violation (AV) for the failure to properly store Safeguards Information (SGI) while unattended, as required by 10 CFR 73.21(d), was identified when security staff, while discussing staffing numbers which prompted a need to reference a new revision of a Security Training Lesson Plan (LP), recognized that the document in the [redacted] was a previous revision. The security Shift Supervisor (SSS) then realized that the current revision had been inadvertently combined with non-safeguards information that was removed from the [redacted] and placed on a desk in an unsecured office outside the Protected Area (PA) for a 5-day period. 7F

Description: Title 10 CFR 73.21(d)(2) requires, in part, that while unattended, SGI shall be stored in a locked security storage container. 7F

On July 15, 2008, at approximately 0730 hours, the Security Operations Supervisor (SOS) and the SSS were discussing staffing numbers, which prompted a need to reference a new revision of LP 2205, "Clinton Power Station (CPS) Site Defensive Strategy"; a document containing safeguards information (SGI) that would have these numbers. At approximately 0740 hours, while researching the document, the SSS recognized that the document in the [redacted] was the previous revision. The SOS then entered the [redacted] and was informed that the current revision was not available. The SSS then realized the possibility that the current revision could have been inadvertently combined with "Read and Sign" documents that were submitted to the SOS for review on July 10, 2008. At about 0745, the SOS and the SSS went to the SOS office in the [redacted]. 7F

OCA and found the SGI document uncontrolled. The SOS and the SSS took possession of the document and conducted a page count that verified no pages were missing. The SGI document was taken to [redacted] and placed in the SGI binder and recorded on the SGI log. The licensee entered the issue into their corrective action program (IR 796575) and initiated a prompt investigation and a root cause evaluation. 7E

Analysis: This finding was determined to be more than minor because in accordance with the guidance in Inspection Manual Chapter (IMC) 0609, Appendix B, the deficiency, if left uncorrected, could have become a more significant security concern. Specifically, it could have led to unauthorized access to Safeguards Information by individuals who did not have a need-to-know.

Using the Physical Protection Significance Determination Process (PPSDP) in Inspection Manual Chapter (IMC) 0609, Appendix E, Part I, Section A requires a determination of whether the finding could impact the OCA, Protected Area, or a Vital Area and whether the finding affects any of the key attributes of the cornerstone (i.e., Access Authorization, Access Control, Physical Protection, or Contingency Response). Because improperly-stored Safeguards Information does not directly affect the impact areas, key attributes, or program elements, Section C of the PPSDP was used to assess the finding.

Under Section C, this finding was determined to be potentially exploitable and additional management review was required to determine the security significance of the finding. In accordance with IMC 0609, Appendix E, Part I, the following factors were considered in determining whether the improperly stored Safeguards Information was exploitable:

- The duration of time the SGI material was improperly stored:

The SGI documents were stored unattended for approximately 5 days in an unlocked room on top of a desk located outside the protected area. Specifically, the SGI document was left unattended on top of a desk in an unlocked room located within the OCA side of the Main Gatehouse from approximately July 10, 2008, at 1105 hours until July 15, 2008, at 0745 hours.

- Whether access to the location was controlled:

Access to the room was not controlled. Specifically, the document was located in a room in the Main Gatehouse which was outside the protected area boundary and did not meet the requirements of a controlled access area because no access controls (e.g., card reader, key lock) were in place. Any badged or unbadged individual could have potentially entered the room without being challenged. Because of the lack of access controls (e.g., card reader, key lock) to the room, there was no mechanism to verify who had accessed this area.

- Whether the improperly stored SGI reflected current information regarding facility security:

The SGI information, if discovered by an adversary, would have provided detailed information regarding the site's current security protective strategy. The document (LP 2205) provided guidance to ensure that Clinton Power Station was

adequately and appropriately protected against the design basis threat to the facility.

In addition, the licensee provided additional information regarding the unattended SGI. The licensee stated that the unattended SGI did not contain a significant amount of detailed information. NRC review of the IMC 0609 factors listed above along with the licensee's additional information and concluded that the unattended SGI document contained sufficient information to enable a potential adversary to defeat, circumvent, or otherwise take advantage of a vulnerability in a security plan, equipment, or performance. Consequently, The NRC concluded that the unattended SGI was exploitable because the documents were in an unlocked room for about 5 days, access to the area was not controlled, and the SGI documents contained the security-related information for the site specific defensive strategy. This apparent violation was preliminarily assessed as having low to moderate security significance (White).

The cause of the finding is related to the cross-cutting area of Human Performance, Resources, because the procedure for controlling SGI did not provide the necessary guidance to individuals to ensure that SGI was properly marked and controlled [H.2(c)]. Specifically, the licensee's procedure did not require SGI to be distinctively marked with a cover page that clearly showed that the material required additional controls.

Enforcement: Title 10 CFR 73.21(d)(2) requires, in part, that while unattended, Safeguards Information shall be stored in a locked security storage container.

Contrary to the above, unattended Safeguards Information was not stored in a locked security storage cabinet from about July 10, 2008, at 1105 hours until July 15, 2008, at 0745 hours. Licensee security personnel left SGI in an unlocked room within the OCA side of the Main Gatehouse. Security management personnel immediately took control of the SGI documents and conducted a page count that verified no pages were missing. The licensee entered the issue into the corrective action program (IR 796575).

Pending final determination of the security significance, this issue is identified as an Apparent Violation (AV 05000461/2008403-01), Failure to Properly Store Safeguards Information While Unattended.

40A6 Meetings

.1 Exit Meeting

The inspectors presented the inspection results to Mr. F. Kearney and other members of licensee management at an interim briefing conducted at the site on September 26, 2008. A final exit meeting was conducted by telephone on October 27, 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
C. Williamson, Site Security Manager
M. Hiter, Security Analyst
S. Gackstetter, Regulatory Assurance Manager
J. Waddell, Security Supervisor

Nuclear Regulatory Commission

B. Kemker, Senior Resident Inspector
D. Lords, Resident Inspector

Illinois Emergency Management Agency

S. Mischke

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000461/2008403-01	AV	Failure to Properly Store Safeguards Information While Unattended
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Closed

05000461/2008002-00	LER	Uncontrolled Safeguards Information
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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.

S07 Security Training (71130.07)

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Clinton Power Station Security Plan (SGI)	5 July 2008
SY-AA-150-1001	Security Training and Qualification Manual	3
SY-AA-151-1001	Safe Firearms Practice Range Operations	1
SY-AA-150-1002	Security Drill and Exercise Manual	0
LS-AA-126-1001	FASA Self-Assessment Report #699107-03	5
SY-AA-150-1001	Security Officer-Individual Qualification Record	
SY-AA-150-1001	Security Force Supervisor-Individual Qualification Record	
	IR#00822709 (NRC Identified)	September 26, 2008
	Sample - Security Personnel Training Files (78)	
	Sample - Security Supervisor Training Files (11)	
	Application for Approval and Registration of a Law Enforcement Course of Fire	October 30, 2007
	NRA - Course of Fire Certification	October 30, 2007
TQ-AA-210-5101	Training Observation Form	5
TQ-AA-224-F080	Training Observation Form	1
	Corrective Action Program Reports (Security-Related);	April - September 2008
	Security Event Reports (SER);	April - September 2008

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S09 Owner-Controlled Area Controls (71130.09)

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Clinton Power Station Security Plan (SGI)	5 July 2008
SY-AA-101-137	OCA Checkpoint Operations	4
SY-AA-101-112	Searching Personnel, Vehicles, Packages, and Cargo	15
SY-LA-101-112-1001	OCA Warehouse Search Activities	1
LS-AA-126-1001	FASA Self-Assessment Report #699107-03	5
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	6
SY-AA-101-116	Conducting Patrols (SGI)	3
SY-AA-101-117	Routine Processing and Escorting of Personnel and Vehicles	16
SY-AA-101-119	Control of Receiving Warehouses	5
SY-AA-101-123	Searching Vehicles and Cargo/Material	8
	IR# 00822663 (NRC Identified)	September 26, 2008
LS-AA-125	Corrective Action Program (CAP) Procedure	9
	Corrective Action Program Reports (Security-Related);	April - September 2008
	Security Event Reports (SER)	April - September 2008

LIST OF ACRONYMS USED

CAP	Corrective Action Program
CFR	Code of Federal Regulations
DRS	Division of Reactor Safety
FASA	Focus Area Self-Assessment
IMC	Inspection Manual Chapter
LP	Security Training Lesson Plan
NOS	Nuclear Oversight
NRC	Nuclear Regulatory Commission
OCA	Owner-Controlled Area
PI	Performance Indicator
PA	Protected Area
SGI	Safeguards Information
SOS	Security Operations Supervisor
SSS	Security Shift Supervisor