



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

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October 20, 2009

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

SUBJECT: CLINTON POWER STATION
NRC SECURITY BASELINE INSPECTION REPORT 05000461/2009403(DRS)

Dear Mr. Pardee:

On September 18, 2009, 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 September 18, 2009, 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.

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D/Q

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 D. Funk for/

Eric Duncan, Chief
Plant Support Branch
Division of Reactor Safety

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

Nonpublic Enclosure: Inspection Report 05000461/2009403(DRS)
w/Attachment: Supplemental Information

cc w/encl: S. Coker, NSIR/DSO/DDSO/ST
C. Williamson, Clinton Station Security Manager
J. Klinger, State Liaison Officer
Illinois Emergency Management Agency

cc w/o encl: Distribution via ListServ

C. Pardee

-2-

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 05000461

License No: NPF-62

Report No: 05000461/2009403(DRS)

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, Illinois

Dates: September 14 through 18, 2009

Inspectors: T. Eck, Physical Security Inspector

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

Enclosure

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SUMMARY OF FINDINGS

IR 05000461/2009403(DRS); 09/14/2009 – 09/18/2009, Clinton Power Station; Routine Security Baseline Inspection.

This report covers a 1 week period of announced routine baseline inspection on security. The inspection was conducted by four 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)

S04 Equipment Performance, Testing, and Maintenance (71130.04)

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 equipment being tested.

The inspectors verified that the security testing and maintenance program: (1) complied with the NRC-approved security plan and other applicable Commission requirements; and (2) was being effectively implemented to assure the functionality and reliability of all security equipment necessary for intrusion detection and assessment, searches, and a rapid, capable response to a Design Basis Threat and other contingencies. The inspectors conducted the following specific inspection activities:

- reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents dated between September 2008 to September 2009 (no licensee event reports were documented);
- verified the licensee developed appropriate testing and maintenance procedures;
- verified for the perimeter intrusion detection system that the licensee ensured:
(a) alarm devices are tamper-indicating and self-checking; (b) the system functioned as designed; (c) required alarms annunciated and could be assessed; (d) alarm station operators could recognize individuals in the detection zones; (e) compensatory measures were established, when required; (f) fields of view were effective; and (g) lighting was being maintained;
- verified for the internal detection and assessment capabilities that: (a) equipment was maintained and tested for functionality and reliability; (b) the equipment was being properly tested; (c) neither the biometric readers or the card readers at the protected area access points allowed a user/ into the protected area (d) an alarm or notification was generated to advise the alarm station operators that were attempted; and (e) security force responded appropriately to an alarm or notification;
- verified for the independent, redundant alarm stations that the licensee:
(a) ensured failure of one station would not affect the other; (b) maintained and tested all enunciator, assessment, surveillance, and communication systems; (c) was not vulnerable to external manipulation; (d) ensured that no single act could remove the capability from both alarm stations; (e) provided all alarm

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stations with [] that annunciate in at least the other alarm station; (f) ensured operational activities does not interfere with the execution of alarm assessment and response; (g) maintained continuous communications with each on-duty security force member and with local law enforcement authorities; and (h) maintained continuous communication between the alarm stations;

- verified for security communication systems that the licensee: (a) maintained each type; (b) appropriately tested equipment; and (c) provided independent power for non-portable equipment;
- verified for the weapons maintenance program that the licensee: (a) maintained each weapon; (b) test fired all weapons at the required periodicity; (c) developed and maintains procedures; and (d) documented activities associated with the program;
- verified for other security-related devices and equipment that the licensee: (a) appropriately maintained and tested those devices and equipment; (b) performed appropriate tests of access control equipment; (c) performed testing in accordance with procedures; (d) ensured that testing of at least one train of search equipment included the most challenging test procedure used by the licensee; (e) established sensitivity settings on the equipment in accordance with the routine calibration/maintenance settings; (f) maintained and tested vital area detection aids; (g) tested all assessment aids, including night-vision, thermal or other devices; (h) maintained and tested all personnel access control and personnel search equipment; (i) maintained and tested all package and material search equipment; (j) maintained and tested all vehicle search equipment; (k) maintained and tested the security system emergency power supply; and (l) powered all alarm systems by an uninterruptible power source;
- verified for new security systems/equipment that the licensee: (a) conducted pre-operational testing and evaluation prior to integration into the security program; and (b) ensured the testing complied with design criteria and performance specifications (the licensee had not installed any new equipment or systems); and
- verified for physical barriers that the licensee: (a) maintained the integrity of all its physical barriers including both the protected area and vital area along with the isolation zones; (b) periodically monitored their condition; and (c) located all vital equipment within a vital area.

The inspectors reviewed equipment performance, testing, and maintenance-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 action, and that adverse trends were identified and addressed.

The inspectors completed 46 of the required 46 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 September 2008 and September 2009 (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 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.

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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.

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 September 18, 2009. 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
- C. Williamson, Security Manager
- J. Waddell, Security Supervisor
- D. Montgomery, Access Authorization

Nuclear Regulatory Commission

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

S04 Equipment Performance, Testing, and Maintenance (71130.04)

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Clinton Power Station Security Plan (SGI)	6
LS-AA-126-1001	FASA Self-Assessment	August 4, 2009
SY-AA-101-122	Testing Security Equipment	16
SY-AA-101-122-1001	Performance of Security System Tests	5
SY-AA-1021	Millenium Protective Mask	4
SY-AA-1015	Security Contingency Equipment Inspection and Maintenance	8
SY-AA-1015-F-01	Record of Semi-Annual Inspections	7
SY-AA-1015-F-02	Record of Monthly Contingency Equipment Inspection	0

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Number	Description or Title	Date or Revision
SY-AA-1015-F-09	Weapons Maintenance Logs	6 & 7
SY-AA-1015-F-10	Weapons Cleaning and Lubrication Guide	0
SY-AA-1015-F-15	Receiving/Entering/Exiting a Weapon In-Service	0
SY-AA-1015-F-17	Contingency Weapon and Equipment Inspection Matrix	0
SY-AA-1015-F-18	Range Weapon Inspection, Cleaning, and Maintenance	0
	Weekly Audit, Inspection, and Maintenance of Contingency Rifles	Sample
SY-AA-101-102	Compensating for Security System Failures	
SY-AA-1013	General Guidance for use of the Itemiser3 Explosives Detector	3
F02 SY-CL-101-122-1001	GE EntryScan4 EDD Operational Test Log	0
SY-CL-101-122-1001	Clinton Site Specific Equipment Testing	0
	Assignment Report (AR) 00966504	September 17, 2009
	Corrective Action Program Reports (Security-Related);	September 2008 – September 2009
	Security Event Reports (SER);	September 2008 – September 2009

S09 Owner-Controlled Area Controls (71130.09)

Number	Description or Title	Date or Revision
	Clinton Power Station Security Plan (SGI);	6
SY-AA-1016	Watch-Standing Practices and Communications	6
SY-AA-101-112	Searching Personnel, Vehicles, Packages, and Cargo	15
SY-LA-101-112-1001	OCA Warehouse Search Activities	1
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-101-116	Conducting Patrols (SGI)	3
SY-AA-101-117	Routine Processing and Escorting of Personnel and Vehicles	17
SY-AA-101-123	Searching Vehicles and Cargo/Material	8
SY-AA-101-137	OCA Checkpoint Operations	6
SY-CL-101-115-1001	Clinton AVB Traffic Control	1
LS-AA-125	Corrective Action Program (CAP)	9

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Procedure	
	Corrective Action Program Reports (Security-Related);	September 2008 – September 2009
	Security Event Reports (SER)	September 2008 – September 2009

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