



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

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

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June 19, 2006

Mr. Christopher M. Crane  
President and Chief Nuclear Officer  
Exelon Nuclear  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION  
NRC PHYSICAL SECURITY BASELINE INSPECTION REPORT  
NO. 05000461/2006005(DRS)

Dear Mr. Crane:

On June 9, 2006, the U.S. Nuclear Regulatory Commission (NRC) completed a baseline security inspection of 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 June 9, 2006, with Mr. M. McDowell 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 the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection no findings of significance were identified.

<b>EXEMPT FROM PUBLIC DISCLOSURE</b>
May be exempt from public release under the Freedom of Information Act (5 U.S.C. 552)
Exemption number: <u>5 3</u>
Nuclear Regulatory Commission review required before public release.
D. Funk, RHI/DRS/PSB
Name and organization of person making determination.
Date of determination: <u>06/12/06</u>

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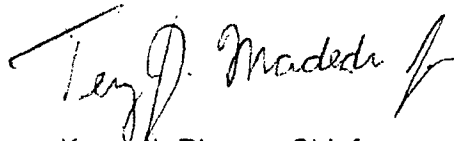
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C. Crane

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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 (PARS) component of NRC's document system, ADAMS. ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (The Public Electronic Reading Room). However, because of the security-related information 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.

Sincerely,



Kenneth Riemer, Chief  
Plant Support Branch  
Division of Reactor Safety

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

Nonpublic Enclosure: Inspection Report 05000461/2006005(DRS);  
w/Attachment: Supplemental Information

cc w/encl: B. Westreich (NSIR/DNS/SOS)  
NSIR/DSP/DDRSR/Licensing Assistant  
C. Williamson, Clinton Site Security Manager  
State Liaison Officer, State of Illinois

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C. Crane

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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 - Nuclear Services  
Vice President - Operations Support  
Vice President - Licensing and Regulatory Affairs  
Manager Licensing - Clinton Power Station  
Senior Counsel, Nuclear, Mid-West Regional Operating Group  
Document Control Desk - Licensing  
Assistant Attorney General  
Illinois Emergency Management Agency  
Chairman, Illinois Commerce Commission

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 05000461/2006005(DRS)

Licensee: AmerGen Energy Company, LLC

Facility: Clinton Power Station

Location: Route 54 West  
Clinton, IL 61727

Dates: June 5 through 9, 2006

Inspectors: D. Funk, Physical Security Inspector

Approved by: K. Riemer, Chief  
Plant Support Branch  
Division of Reactor Safety

~~WARNING~~  
~~Unauthorized Disclosure is Prohibited, Section 147~~  
~~Atomic Energy Act 1954 and 10 CFR 73.21.~~  
~~Violations Subject to Civil and Criminal Sanctions~~

~~Safeguards Information] determination made by:~~  
~~Name/Title D. Funk~~  
~~Organization NRC/RII/DRS/PSB~~  
~~Basis 10 CFR 21~~  
~~Signature D. Funk Date 6/12/06~~

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Enclosure

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**SUMMARY OF FINDINGS**

IR 05000461/2006005(DRS); AmerGen Energy Company LLC, 06/5/2006 - 06/9/2006;  
Clinton Power Station;

This report covers a 1 week period of announced baseline inspection on security. The inspection was conducted by one Region III physical security inspector. No findings of significance were identified.

**A. Inspector-Identified and Self-Revealed Findings**

**Cornerstone: Physical Protection**

No findings of significance.

**B. Licensee-Identified Violations**

No findings of significance.

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# SAFEGUARDS INFORMATION

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

The inspectors verified that the access control program: (1) complied with the NRC-approved security plan and any other applicable Commission requirements; (2) established control measures and equipment to detect and prevent the introduction of contraband into the protected area; and (3) ensured that only personnel who were properly screened were granted unescorted access to the protected and vital areas. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents from June 2005 to May 2006;
- Verified the licensee: (a) developed procedures to block badges for suspended personnel; (b) ensured security personnel remained familiar with the steps for denying access; (c) did not establish procedures that reduced the effectiveness of the security plans; and (d) established measures to protect badging activities conducted outside the protected area;
- Verified for package, personnel, and vehicle searches that the licensee: (a) established effective implementing procedures; (b) ensured collateral duties did not adversely impact the security officers' ability to perform their primary duty; (c) provided sufficient staffing; and (d) established appropriate processes for items exempted from search;
- Verified the licensee could manually control access to vital areas;
- Verified the licensee properly: (a) controlled and accounted for hard keys; (b) maintained the bullet-resistant glazing at access control in good shape; (c) positively controlled package, personnel, and vehicle access into the protected area; (d) ensured access control personnel appropriately identify packages; and (e) maintained control of vehicles delivering hazardous material within the protected area; and

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The inspectors reviewed access control 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 addressed.

The inspectors completed 16 of the required 16 samples.

a. Findings

No findings of significance were identified.

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 exercise.

The inspectors verified that the nuclear security training program: (1) complied with the licensee's NRC-approved Security, Training and Qualification Plan, and any other regulatory requirements; (2) developed security personnel knowledge, skills and ability conform with the Training and Qualification plan and other regulatory requirements; and (3) ensured equipment assigned to security personnel conforms with the Training and Qualification Plan and any other regulatory requirements. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents between June 2005 and May 2006 (No licensee event reports were documented);
- 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 security personnel participate in range activities at the prescribed frequency; (f) prevented security personnel from returning to duty when requisite qualification has 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;

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- 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;
- 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 possess 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 refresher training; and (c) ensured armed security personnel pass the annual examination prior to resuming duties;
- Verified that the licensee maintains 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

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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 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 addressed.

The inspectors completed 41 of the required 41 samples.

b. Findings

No findings of significance were identified.

4OA2 Event Follow-up (71153)

.1 (Closed) Unresolved Item 05000461/2005004-01: Review Corrective Actions for Licensee Gas Masks Not in Compliance with NRC Order.

On March 16, 2005, the NRC concluded that the gas masks [ ] used by the licensee as armed responder contingency equipment were inadequate. This issue was considered to be a violation of the NRC revised Design Basis Threat (DBT) Order, issued April 29, 2003, and implemented on October 29, 2004. However, because the licensee made a good-faith effort to comply with the requirements of the Order, no enforcement action was taken. The licensee documented the issue in Condition Report 00313455. An unresolved item was opened for the NRC to review the corrective actions taken by the licensee in response to this finding. EXT 3

The inspectors reviewed the licensee's corrective actions. The licensee replaced all of the armed responders' contingency masks with a newer model [ ] which provided appropriate protections against the DBT. The inspectors toured selected armed responder posts and verified that each officer had a gas mask readily available. In addition, the inspectors reviewed the firearms courses of fire and verified that the armed responders were being trained in the use of the new model of gas mask. The inspectors concluded that the corrective actions were adequate and complete. The unresolved item is closed. EXT 3

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4. OTHER ACTIVITIES

4OA6 Meetings

.1 Exit Meeting

The inspectors presented the inspection results to Mr. M. McDowell and other members of licensee management at the conclusion of the on-site inspection on June 9, 2006. The inspectors asked the licensee if any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

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SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

M. McDowell, Plant Manager  
K. Baker, Executive Assistant to Site Vice President  
B. Findley, Corporate Security  
R. Frantz, Regulatory Assurance Representative  
S. Hart, Wackenhut, Project Manager  
J. Lindsey, Training Director  
M. Mayer, Security Training Coordinator  
J. Peterson, Regulatory Assurance Manager (acting)  
D. Schavey, Operations Director  
C. VanDenburgh, Nuclear Oversight Manager  
J. Waddell, Security Supervisor  
R. Weber, Senior Manager Design Engineering  
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

None

Closed

05000461/200500<sup>4</sup>~~5~~-01      URI      Review Corrective Actions for Licensee Gas Masks  
Not in Compliance with NRC Order

Discussed

None

**SAFEGUARDS INFORMATION**

**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.

S02 Access Control (71130.02)

Clinton Power Station Security Plan; Revision 1; dated June 2005

SY-AA-101-107; Control and Confiscation of Contraband or Prohibited Items; Revision 2

SY-AA-101-110; Maintaining Search Integrity Between Stations; Revision 4

SY-AA-101-112; Searching Personnel and Packages; Revision 9

SY-AA-101-113; Escorting Personnel and Vehicles; Revision 5

SY-AA-101-117; Processing Visitors and Vehicles Into the Protected Area; Revision 12

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

SY-AA-101-119; Control of Receiving Warehouses; Revision 2

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

Individual Qualification Records (Member of the Security Organization (MSO)) for 2005 and 2006

Individual Qualification Records (Non-Member of the Security Organization (MSO)) (9)

SY-CL-101-2000; Post Orders - P-6 (OCA) Patrol; Revision 1

Security Key and Core Change Worksheet dated December 6, 2005 (SY-CL-101-2000 Revision 1)

Check-in Self-Assessment Report - Access Control and Security Training; dated June 6, 2006

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

CAP Reports (Security Related); June 2005 - May 2006

Security Event Reports (SER); June 2005 - May 2006

S07 Security Training (71130.07)

Clinton Power Station Security Plan; Revision 1; dated June 2005

NEI 03-09; Security Officer Training Program; Revision 2

SY-AA-101-125; Inventory and Control of Security Equipment; Revision 0

SY-AA-150-1001; Security Training and Qualification Manual; Revision 0

SY-AA-150-1002; Security Drill and Exercise Manual; Revision 0

SY-AA-1015; Security Contingency Equipment Inspection and Maintenance, Revision 1

SY-AA-1019; Weapons Test Fire; Revision 0

SY-AA-1021; Protective Mask; Revision 0

EX.3

TQ-AA-140; Exelon Nuclear Security Training; Revision 1

Exelon Security Training Lesson Plan (LP) 2205; Site Specific Defensive Strategy;  
Revision 4

Exelon Security Training LP 4101; Weapons Safety and Fundamentals; Revision 1

Exelon Security Training LP 4102; Tactical Weapons Training; Revision 1

Exelon Security Training LP 4204; Stress Fire Exercises; Revision 1

Exelon Security Training LP 4205; Site Specific Familiarization Training; Revision 0

Security Training Program - Annual Firearms Proficiency Training; dated September 9,  
2005

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Exelon Daylight Handgun Qualification Course Description; Revision 1; dated September 2004

Exelon Daylight Rifle Qualification Course Description

Exelon Night-Fire Handgun Qualification Course Description

Exelon Night-Fire Rifle Qualification Course Description

Clinton Tactical Course Description; Revision 3

Tactical Qualification Course Worksheet; Revision 1; dated August 9, 2005

National Rifle Association (NRA) of America Letter, Application for Course of Fire Approval and Registration (Daylight Rifle); dated July 26, 2004

NRA of America Letter, Application for Course of Fire Approval and Registration (Daylight Handgun, Night Fire Handgun/Rifle); dated August 13, 2004

Letter dated April 21, 2006 - Pistol and Rifle Instructor Certification Expiration Dates

Individual Qualification Test (IQT) #22; Physical Fitness; Revision 0

Clinton Security Training Schedule 2006; dated February 7, 2006; Revision 3

Wackenhut Policy Number 503; Firearms Handling and Range Training; Revision 0

Wackenhut Policy Number 506; Contingency Weapons Handling; Revision 2

Army Training Manual (TM) 9-1005-319-23&P; Unit and Direct Support Maintenance Manual

Figure 3 - 1 Security Physical Examination Record (SY-AA-150-1001)

Listing of Individuals who Require a Second Pair of Glasses/Lenses as of June 2006

Security Officer Annual Exam NRC Order Reference; dated March 14, 2005

Wackenhut Security Roster; dated June 5, 2006

Annual and Quarterly Security Force on Force (FOF) Evaluated Drills, 2005 and 2006

FOF Drill/Exercise Scenarios (14)

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## **SAFEGUARDS INFORMATION**

Check-in Self-Assessment Report - Access Control and Security Training; dated June 6, 2006

LS-AA-125; CAP Procedure; Revision 9

CAP Reports (Security Related); dated June 2005 - May 2006

Condition Report (CR) 00498214 - Administrative Error Identified on Security Training Record (NRC Identified)

CR 00479109 - Unauthorized Individual Apprehended

SERs; dated June 2005 - May 2006

### **LIST OF ACRONYMS USED**

CAP	Corrective Action Program
CR	Condition Report
DBT	Design Basis Threat
DRS	Division of Reactor Safety
FOF	Force on Force
IQT	Individual Qualification Test
LP	Lesson Plan
NRA	National Rifle Association of America
NRC	Nuclear Regulatory Commission
SER	Security Event Report