THE SAFETY/SECURITY INTERFACE AT EXELON

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EXELON PREPARATION FOR 73.58

- Exelon participated with the Industry Working Group to understand the 73.78 rule requirements and provide comments to the NRC

- Changes were implemented across the Exelon fleet on 3/31/2010 in our standard Fleet Security Plans

- 73.78 requires that licensees:
  - consider potential for changes to cause adverse interaction between security and safety and
  - manage any adverse results.

- While existing processes identified changes created by planned or emergent activities, there was no single point of contact for these activities to assess the Safety - Security interface

IMPLEMENTATION

- Section 73.58(d) requires that licensees, when potential adverse interactions are identified,

  - communicate the potential adverse interactions to appropriate licensee personnel

  - take appropriate compensatory and mitigative actions to maintain safety and security consistent with the applicable requirements

- The compensatory and/or mitigative actions taken must be consistent with existing requirements for the affected activity

EXELON IMPLEMENTING PROCEDURE

- Exelon's procedure identifies the management controls and processes used to establish an interface between plant activities. These controls and processes…
  - ensure that potential adverse impacts to plant safety and security are considered and addressed prior to implementation of planned changes to
    - physical layout,
    - facilities,
    - structures, systems, components, and
    - operating procedures
  - also address the safety and security impact of emergent plant conditions

SAFETY/SECURITY PERSONNEL

- All Members of the Security Organization are trained to remain alert for emergent plant conditions/activities that have the potential to impact implementation of the site protective strategy.

- Exelon created a new position titled Security Work Control and Projects Analyst (SWCPA)
  - The SWCPA attends site work control meetings to identify and screen conditions or activities having a potential to adversely impact plant safety and security

COMMUNICATIONS PROTOCOL

- SWCPA communicates to plant and security management and assists in evaluating impact and identifying compensatory/mitigative measures. These include:
  - any adverse impacts to fields of view/fire resulting from plant activities
  - activities or issues with a potential to affect plant area or site access
- The SWCPA interfaces with the Shift Manager on a daily basis to identify planned and emergent plant conditions or activities having a potential to adversely impact plant safety or security

SAFETY SECURITY INTERFACE MAINTENANCE

- Controls and processes Exelon uses to manage planned and emergent activities and conditions to address potential adverse impact on safe operations and security include:
  - Plan of the Day (POD) meeting
  - Plant Operations Review Committee (PORC)
  - Routine Operator rounds, Safety Professional in-plant walk-downs and routine Security patrols in the OCA, PA, and VA.
  - Daily fleet plant status calls
  - Corrective Action Program (CAP)
  - On-Line Risk Management
  - Work Planning / Outage Planning