

September 8, 2000

Mr. Michael T. Coyle
Vice President
Clinton Power Station
AmerGen Energy Company, LLC
Mail Code V-275
P.O. Box 678
Clinton, IL 61727

SUBJECT: CLINTON - NRC INSPECTION REPORT 50-461/2000016(DRS)

Dear Mr. Coyle:

On August 25, 2000, the NRC completed a baseline inspection at your Clinton Power Facility. The results of this inspection were discussed with you and other members of your staff on August 25, 2000. The enclosed report presents the results of that inspection.

The inspection was an examination of activities under your license as they relate to the Safeguards Strategic Performance Area and compliance with the Commission's rules and regulations and the conditions of your license. Within this area, the inspection consisted of a selected examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on performance involving your access control and access authorization programs, your program for collecting and reporting performance indicator information and security plan revisions. The NRC did not identify any issues which were categorized as being of risk significance.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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 document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

James R. Creed
Safeguards Program Manager
Division of Reactor Safety

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

Enclosure: Inspection Report 50-461/2000016(DRS)

See Attached Distribution

cc w/encl:

P. Hinnenkamp, Plant Manager
M. Reandeau, Director - Licensing
G. Rainey, Chief Nuclear Officer
E. Wrigley, Manager-Quality Assurance
M. Aguilar, Assistant Attorney General
G. Strambach, Regulatory Licensing
Services Project Manager
General Electric Company
Chairman, DeWitt County Board
State Liaison Officer
Chairman, Illinois Commerce Commission

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DATE	09/1/00		09/8/00		09/8/00			

OFFICIAL RECORD COPY

cc w/encl:

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M. Aguilar, Assistant Attorney General
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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

Report No: 50-461/2000016(DRS)

Licensee: AmerGen Energy Company, LLC

Facility: Clinton Power Station

Location: Route 54 West
Clinton, IL 61727

Dates: August 21 - 25, 2000

Inspector: James L. Belanger
Senior Physical Security Inspector

Approved by: James R. Creed
Safeguards Program Manager
Division of Reactor Safety

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas) reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness

Radiation Safety

- Occupational
- Public

Safeguards

- Physical Protection

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

SUMMARY OF FINDINGS

IR 50-461/2000016,(DRS), on 08/21-25/2000; AmerGen Energy Company; Clinton Power Station; Security specialist report.

The inspection was conducted by a regional security specialist. No findings were identified.

Report Details

3. SAFEGUARDS

Cornerstone: Physical Protection (PP)

3PP1 Access Authorization (AA) Program (Behavior Observation Only) (IP 71130.01)

a. Inspection Scope

The inspector interviewed five supervisors and five non-supervisors to determine their knowledge level and practice of implementing the licensee's behavior observation program responsibilities as required. Selected procedures pertaining to the Behavior Observation Program and associated training activities were also reviewed.

The inspector reviewed a sample of the licensee's records to verify the implementation of the licensee's assessment and corrective action program. Specifically, Quality Assurance audits and assessments, self-assessments conducted by the security organization and three calendar quarters of logged security events that involved access authorization, behavioral observation and fitness-for-duty were reviewed to determine their scope to correctly identify issues that involved the behavioral observation program. The inspector also reviewed the licensee corrective action program to determine that it was properly focused in the areas of identification, evaluation of risk significance, root cause analyses, performance trending, and short term corrective actions regarding behavioral observation activities.

b. Findings

There were no findings identified.

3PP2 Access Control (Identification, Authorization and Search of Personnel, Packages, and Vehicles (IP 71130.02)

a. Inspection Scope

The inspector reviewed the licensee's protected area access control testing and maintenance programs. The inspector observed licensee testing of all protected area access control equipment to determine if testing and maintenance practices were performance based. On at least three occasions during peak and routine ingress periods, the inspector observed in-processing search of personnel, packages, and vehicles to determine if search practices were conducted in accordance with regulatory requirements. Interviews were conducted and records were reviewed to verify that security staffing levels at protected area entry points were consistently implemented. Also, the inspector reviewed the licensee's process for limiting access to only authorized personnel to the protected area or vital equipment by a review of vital area access lists and interviews with security management. The inspector reviewed the licensee's program to control hard-keys and computer input of security related personnel data.

The inspector reviewed a sample of licensee self-assessments, audits, and security logged events to determine their scope to identify and correct issues that involved access control programs (see attached list of documents reviewed). In addition, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Findings

There were no findings identified.

3PP4 Security Plan Changes (IP 71130.04)

a. Inspection Scope

The inspector reviewed revisions to the Clinton Security Plan which were submitted by letters dated July 28, 2000 (Revision 29) and September 5, 2000 (Revision 30). These changes were reviewed to verify that the changes did not decrease the effectiveness of the security plan. The revisions were submitted in accordance with 10 CFR 50.54(p).

b. Findings

There were no findings identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (IP 71151)

a. Inspection Scope

The inspector reviewed the licensee's Performance Indicator (PI) program for the purpose of verifying PI accuracy for the Physical Protection Performance Indicators (PI) pertaining to Protected Area Equipment, Personnel Screening, and Fitness-for-Duty/Personnel Reliability Programs. The inspector reviewed a sample of plant reports generated for the current four calendar quarters related to access authorization and fitness-for-duty events and other applicable records to validate the accuracy of licensee submitted PI data.

b. Findings

There were no findings identified.

4OA5 Performance Indicator Data Collecting and Reporting Process Review (TI 2515/144)

a. Inspection Scope

The inspector reviewed the licensee's process for identifying, gathering, and submitting data for the Physical Protection Performance Indicators (PI) pertaining to Protected Area Equipment, Personnel Screening, and Fitness-for-Duty/Personnel Reliability Programs.

b. Findings

There were no findings identified.

4OA6 Management Meeting

Exit Meeting Summary

The inspector presented the inspection results to Mr Coyle, Vice President, and other members of licensee management at the conclusion of the onsite inspection on August 25, 2000. The licensee representatives acknowledged the inspector's remarks. No proprietary information was discussed.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

M. Coyle, Vice President
G. Baker, Manager, Nuclear Support
G. Birk, Security Administrator
P. Hinnenkamp, Plant Manager - Clinton Power Station
M. Hiter, Personnel Processing Supervisor
M. McNamer, Burns Security Site Manager
M. Reandeau, Director, Licensing
D. Smith, Director, Emergency Planning and Security
C. Williamson, Supervisor, Security

NRC

P. Louden, Senior Resident

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS USED

AA	Access Authorization
CFR	Code of Federal Regulations
CPS	Clinton Power Station
DRS	Division of Reactor Safety
FFD	Fitness-For-Duty
NRC	Nuclear Regulatory Commission

LIST OF DOCUMENTS REVIEWED

Quality Assurance Assessment Q38-1999-01, "Security Screening Process"
Quality Assurance Assessment 1999-04-61-11, "Personnel Processing - Access Authorization"
Quality Assurance Assessment 2000-04-61-00, "Access Authorization"
Quality Assurance Assessment 2000-05-62-00, "Personnel Processing - Fitness-for-Duty"
Quality Assurance Assessment 2000-06-00-01, "Condition Report Process Assessment"
Quality Assurance Audit Report Q38-99-04, "Security"
Quality Assurance Field Observation Report No. 2000-63-005, "Performance Indicator Calculations"
Self-Assessment Report on Fitness-for-Duty (1999-120)
Self-Assessment Report on Fitness-for-Duty (2000-072)
Semi-Annual Fitness-for-Duty Report (January 1, 2000 - June 30, 2000)
CPS 1701.58, "Lock and Core Control" dated September 8, 1998
Training Guide Number LP10400, Revision 8 (GET - Fitness-for-Duty)
Nuclear Support Department Procedure NS 1.16, Revision 10, "Fitness-for-Duty"
CPS 1001.15, "Collection, Documentation, Verification, and Submittal of CPS Performance Indicators," dated March 22, 2000
Detection Lane Drills (October 1999- June 2000)
CPS Condition Reports (security related) (January 2000 to June 2000)