



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

PROPRIETARY INFORMATION

June 7, 2004

Mr. M. R. Blevins, Senior Vice President
and Principal Nuclear Officer
TXU Energy
ATTN: Regulatory Affairs
Comanche Peak Steam Electric Station
P.O. Box 1002
Glen Rose, Texas 76043

**SUBJECT: COMANCHE PEAK - NRC PHYSICAL SECURITY LIMITED BASELINE
INSPECTION REPORT 05000445/2004007 and 05000446/2004007**

Dear Mr. Blevins:

This refers to the inspection conducted from May 5 through June 2, 2004, at Comanche Peak Steam Electric Station. The enclosed report presents the results of this inspection, which were discussed with Mr. R. Flores, Vice-President Operations, and other members of your staff.

This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to compliance with the Commission's rules and regulations, orders, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has identified two issues that were evaluated under the risk significance determination process as having very low safety significance (Green). The NRC has also determined that violations are associated with these issues. These violations are being treated as non-cited violations, consistent with Section VI.A of the Enforcement Policy. These non-cited violations are described in the subject inspection report. If you contest the violations or significance of the non-cited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with a copy to the Regional Administrator, Region IV, and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001, and the NRC Resident Inspector at the Comanche Peak Steam Electric Station facility.

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Because these issues involve security-related information, 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 "Proprietary Information in accordance with 10 CFR 2.390(d)(1)," and follow the instructions for withholding in 10 CFR 2.390(b)(1). In accordance with 10 CFR 2.390(b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

The material enclosed herewith contains Proprietary Information in accordance with 10 CFR 2.390(d)(1) and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material 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>.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

//RA//

Michael P. Shannon, Chief
Plant Support Branch
Division of Reactor Safety

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-89

Enclosure:
NRC Inspection Report 05000445/2004007 and 05000446/2004007
w/attachment: Supplemental Information (**Proprietary Information**)

cc: **without enclosure**
Fred W. Madden
Regulatory Affairs Manager
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P.O. Box 1002
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TXU Energy

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REGION IV

Dockets: 50-445, 50-446
Licenses: NPF-87, NPF-89
Report: 05000445/2004007 and 05000446/2004007
Licensee: TXU Generation Company LP
Facility: Comanche Peak Steam Electric Station, Units 1 and 2
Location: FM-56, Glen Rose, Texas
Dates: May 3 - June 2, 2004
Inspectors: Gregory A. Pick, Senior Physical Security Inspector
Thomas W. Dexter, Consultant
Approved by: Michael P. Shannon, Chief, Plant Support Branch
Division of Reactor Safety

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Enclosure

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SUMMARY OF FINDINGS

IR 05000445/2004007, 05000446/2004007; 05/03 - 06/02/04; Comanche Peak Steam Electric Station, Units 1 & 2; Security Limited Baseline Inspection

The report covered a 4-day period of on site and included in-office inspection by two physical security inspectors. Two Green non-cited violations were identified. The significance of most findings are indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process." Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review.

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Physical Protection

- Green. The inspectors processed a self-revealing non-cited violation of the Physical Security Plan. Specifically, the Central Alarm Station was abandoned on numerous occasions during a 3-month period. The licensee placed this event into their corrective action program and implemented appropriate corrective actions.

This was a performance deficiency because the licensee failed to comply with the Physical Security Plan requirement to man the Central Alarm Station 24 hours each day. This was more than minor because it related to the Response to Contingency Events attribute and could affect the cornerstone objective to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage. When processed through the Interim Physical Protection Significance Determination Process, the finding was determined to be of very low safety significance. Although the finding reflected a vulnerability in safeguards systems, there was no actual intrusion, and there were no similar findings in the previous 4 quarters (Section 4OA5).

- Green. The inspectors processed a self-revealing non-cited violation of 10 CFR 73.21. The licensee failed to ensure that Safeguards Information was protected against unauthorized disclosure.

This failure to properly control Safeguards Information was a performance deficiency because the licensee did not comply with the requirements of 10 CFR 73.21(a). This was more than minor because it related to the Response to Contingency Events attribute and could affect the objective to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage. When processed through the Interim Physical Protection Significance Determination Process, the finding was determined to be of very low safety significance. Although the finding reflected a vulnerability in safeguards systems, there was no actual intrusion, and there were no similar findings in the previous 4 quarters (Section 4OA5).

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B. Licensee-Identified Violations

None

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REPORT DETAILS

3. SAFEGUARDS

Cornerstone: Physical Protection (PP)

3PP1 Access Authorization (71130.01)

a. Inspection Scope

The inspectors evaluated this area by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and performing walk downs of the access authorization spaces.

The inspectors verified that the access authorization program: (1) complied with the NRC-approved security plan and any other applicable Commission requirements; (2) provided high assurance that personnel with unescorted access were trustworthy, reliable, and did not constitute an unreasonable risk to public health and safety, including the potential to commit radiological sabotage; and (3) established a behavioral observation program that provided high assurance of continued reliability and trustworthiness of personnel with unescorted access. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents between June 2003 and April 2004 (No licensee event reports were documented).
- Verified that the licensee implemented: (a) behavioral observation training; (b) procedures related to behavioral observation training; (c) an unescorted access program; and (d) procedures related to the personnel information management system.
- Verified that the licensee established an effective access authorization program that: (a) included appropriate categories; (b) verified true identities; (c) conducted suitable inquiries; (d) required psychological evaluations; (e) had anomalous results reviewed by a licensed psychologist or psychiatrist; (f) required FBI criminal history record checks; (g) assessed trustworthiness and reliability; (h) reviewed credit history summaries; (i) evaluated for fraud and misuse of financial identifiers; (j) compared the credit history summary with the personal history questionnaire; and (k) implemented best effort evaluations, as appropriate.
- Verified that the licensee implemented an update process that: (a) reviewed employment history; (b) reviewed the length and character of employment; (c) required psychological evaluations; (d) conducted clinical reviews by a licensed psychologist or psychiatrist; (e) conducted inquiries for reinstatement, as required; (f) reviewed the criminal history, credit history, and drug test results prior to granting access; and (g) audited contractor/vendor programs with a knowledgeable person.

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- Verified that the licensee utilized a program to effectively manage a common industry database that: (a) established a method to check on personnel from other facilities; (b) identified personnel denied access; (c) had procedures to address personnel denied access; (d) denied access to personnel who violated NRC requirements; (e) identified personnel who are in a follow-up program; and (f) identified personnel potentially affected by any violation of 10 CFR Part 26.
- Verified that the licensee (a) reinvestigated all personnel having unescorted access and (b) developed, implemented, and maintained similar criteria for individuals performing background investigations.
- Verified that the licensee established a behavioral observation program that: (a) ensured recognition of behaviors adverse to the safe operation and security of the facility; (b) documented behavioral observation program training and refresher training; (c) established provisions to train offsite personnel; and (d) validated implementation of the behavior observation program for off-site employees.
- Verified that the licensee implemented the following to address an insider threat and verify human reliability: (a) re-assessed and re-approved personnel access lists for vital areas; (b) established controls for vital area access upon existence of a specific, credible insider threat; (c) eliminated temporary unescorted access to the facility; (d) established a program to account for the prescribed attributes of an insider; and (e) established a program that included the prescribed human reliability elements to mitigate the potential for an active insider.
- Verified that the licensee developed, implemented, and maintained a personnel information management system that: (a) protected personal and confidential information; (b) protected information stored or transmitted in electronic format; and (c) prohibited unauthorized access and modification of the data without proper authorization.

The inspectors completed 42 of the required 44 samples. The following two samples related to the design basis threat were not inspected since the requirements will be effective on October 29, 2004:

- Established a program to account for the prescribed attributes of an insider.
- Established a program that included the prescribed human reliability elements to mitigate the potential for an active insider.

b. Findings

No findings of significance were identified.

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3PP2 Access Control (71130.02)

a. Inspection Scope

The inspectors evaluated this area by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and performing walk downs 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 between June 2003 and April 2004 (No licensee event reports were documented).
- Verified that 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 duties; (c) provided sufficient staffing; and (d) established appropriate processes for items exempted from search.
- Verified that the licensee could manually control access to vital areas.
- Verified that the licensee properly: (a) controlled and accounted for hard keys; (b) properly maintained the bullet-resistant glazing at access control; (c) positively controlled package, personnel, and vehicle access into the protected area; (d) ensured access control personnel appropriately identified packages; and (e) maintained control of vehicles delivering hazardous material within the protected area.

The inspectors completed 16 of the required 16 samples.

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b. Findings

No findings of significance were identified.

3PP8 Fitness For Duty Program (71130.08)

a. Inspection Scope

The inspectors evaluated the specific area of security force work hour controls by: reviewing procedures and records; conducting interviews with responsible personnel and plant employees; and reviewing security event reports, corrective action documents and event logs for the previous 12 months.

The inspectors verified that the fitness-for-duty program: (1) complied with the NRC-approved security plan, 10 CFR Part 26, "Order for Compensatory Measures Related to Fitness-for-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel" (FFD Order), dated October 23, 2003, and any other applicable Commission requirements; and (2) ensured nuclear facility security force personnel were not assigned to duty while in a fatigued condition. The inspectors conducted the following specific inspection activities:

- Reviewed and evaluated licensee event reports, safeguards log entries, and corrective action documents between June 2003 and April 2004 (No licensee event reports were documented).
- Verified for security force working hours required by the Order that the licensee: (a) ensured individual work hour limits were not exceeded and that management-approved deviations were authorized and documented; (b) ensured group work hour limits have not been exceeded under normal plant conditions, planned plant or planned security system outages, unplanned plant or unplanned security outages, increases in plant threat condition, and during force-on-force exercises; and (c) developed procedures/processes that: (1) controlled the work hours program, (2) provided the ability to self report being unfit for duty, and (3) ensured self-declarations were documented and that at least 10 hours passed prior to returning to duty.

The inspectors completed 5 of the required 5 samples.

b. Findings

No findings of significance were identified.

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4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors sampled licensee submittals for the following Physical Protection Cornerstone performance indicators: (1) protected area security equipment, (2) personnel screening program performance, and (3) fitness-for-duty program performance for the period between June 2003 and March 2004. The inspectors verified: (1) the accuracy of the performance indicator data reported during that period and (2) used the performance indicator definitions and guidance contained in NEI 99-02, "Regulatory Assessment Indicator Guideline," Revision 2, to verify the basis in reporting for each data element.

The inspectors interviewed licensee personnel that were accountable for collecting and evaluating the performance indicator data and reviewed the process for collecting and submitting the performance indicator data. Specifically, the inspectors randomly selected security event logs and corrective action reports for the 3 months being reviewed.

The inspectors completed 3 of the required 3 samples.

b. Findings

No findings of significance were identified.

4OA2 Problem Identification and Resolution

Annual Sample Review

a. Inspection Scope

The inspectors evaluated licensee activities to determine whether the licensee appropriately resolved conditions adverse to quality, which included identifying the root cause, implementing appropriate corrective actions, and trending lower level deficiencies.

b. Findings and Observations

The inspectors reviewed the safeguards event logs and evaluated a listing of corrective action documents between June 2003 and April 2004. The inspectors did not identify any negative trends and concluded that the licensee implemented appropriate corrective actions.

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The inspectors reviewed several quality assurance audits and determined that the licensee implemented appropriate corrective actions for all identified deficiencies and/or concerns. No findings of significance were identified.

40A5 Other

1. Abandonment of Central Alarm Station

Introduction. The inspectors processed a self-revealing Green non-cited violation of the Physical Security Plan. Specifically, the Central Alarm Station was abandoned on numerous occasions during a 3-month period. The licensee placed this event into their corrective action program and implemented appropriate corrective actions.

Description. During review of security logs, the inspectors identified a self-revealing finding related to failure to continuously man the Central Alarm Station. On October 3, 2003, a shift lieutenant identified a concern related to manning of the Central Alarm Station. From July 1 through October 3, 2003, on 22 occasions on-duty alarm station operators left the Central Alarm Station unmanned for "urgent medical needs." In each instance, the alarm station operator had informed the Secondary Alarm Station. Subsequent to identification of this issue and counseling of the officer, there were no additional instances when the Central Alarm Station was unmanned.

From review of Security Field Report 1043-03 and interviews with personnel who performed the investigation, the inspectors determined that this behavior did not meet management expectations. The licensee expected that a replacement officer or supervisor would man the alarm station prior to an alarm station operator leaving the Central Alarm Station, as required by the Physical Security Plan.

Analysis. This was a performance deficiency because the licensee failed to comply with the Physical Security Plan requirement to man the Central Alarm Station 24 hours each day. This was more than minor because it related to the Response to Contingency Events attribute and could affect the cornerstone objective to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage. When processed through the Interim Physical Protection Significance Determination Process, the finding was determined to be of very low safety significance. Although the finding reflected a vulnerability in safeguards systems, there was no actual intrusion, and there were no similar findings in the previous 4 quarters.

Enforcement. Operating License DPR-40, License Condition 3.C specified that the licensee will follow all aspects of their Physical Security Plan. The Physical Security Plan, Section 2.3.10.2, specified, "The Central Alarm Station is manned by a member of the Security Organization 24 hours per day." Contrary to the Physical Security Plan, on several occasions from July to October 2003, alarm station operators failed to continuously man the Central Alarm Station. Because this failure was of very low safety significance and had been entered into the corrective action program (Security Field

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Report 1043-03), this violation is being treated as a Green non-cited violation, consistent with Section VI.A of the NRC Enforcement Policy: NCV 05000445; 0500446/2004007-01, Failure to continuously man the Central Alarm Station.

2. Control of Safeguards Information

Introduction. The inspectors processed a self-revealing Green non-cited violation of 10 CFR 73.21. The licensee failed to ensure that Safeguards Information was protected against unauthorized disclosure.

Description. During review of security logs, the inspectors determined the licensee had failed to control Safeguards Information, as required. Following an onsite emergency drill in the control room simulator, licensee personnel failed to maintain Operations Guideline 38, "Security Response," dated January 9, 2003, in the possession of an authorized individual or to lock the document in an approved Safeguards Information container. The information was outside the protected area and not in a controlled area. The inspectors reviewed Operations Guideline 38 and concluded that the document contained Safeguards Information. The licensee had not maintained control of the Safeguards Information for 30 minutes.

Analysis. This failure to properly control Safeguards Information was a performance deficiency because the licensee did not comply with the requirements of 10 CFR 73.21(a). This was more than minor because it related to the Response to Contingency Events attribute and could affect the objective to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage. When processed through the Interim Physical Protection Significance Determination Process, the finding was determined to be of very low safety significance. Although the finding reflected a vulnerability in safeguards systems, there was no actual intrusion, and there were no similar findings in the previous 4 quarters.

Enforcement. 10 CFR 73.21(a) requires that each licensee that is licensed to operate a nuclear power reactor and each person that produces, receives, or acquires Safeguards Information ensure that Safeguards Information is protected against unauthorized disclosure. To meet this general performance requirement, licensees shall establish and maintain an information protection system that includes the measures specified in paragraphs (b) through (i) of 10 CFR 73.21.

10 CFR 73.21(d) describes the requirements for protecting information while in use or storage. 10 CFR 73.21(d)(1) specified, "While in use, matter containing Safeguards Information shall be under the control of an authorized individual. 10 CFR 73.21(d)(2) specified, "While unattended, Safeguards Information shall be stored in a locked security storage container."

Contrary to the above, licensee representatives failed to maintain Safeguards Information under their direct control and failed to lock the procedure in a Safeguards

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Information security container. Specifically, licensee representatives left unattended a written procedure related to a site specific credible threat. Because this failure was of very low safety significance and had been entered into the corrective action program (Smart Form 2003-1345), this violation is being treated as a Green non-cited violation, consistent with Section VI.A of the NRC Enforcement Policy: NCV 05000445; 0500446/2004007-02, Failure to maintain control of Safeguards Information.

4OA6 Meetings, including Exit

On June 2, 2004, the inspectors presented the preliminary inspection results to Mr. R. Flores, Vice-President Operations, and other members of licensee management who acknowledged the findings. The inspectors destroyed proprietary information provided and examined during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

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SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

D. Alps, Security Manager
B. Askren, SECURITAS Project Manager
J. Brown, FFD Coordinator
J. Braun, Security Systems Coordinator
B. Hammer, Corporate Security
D. Harden, Corporate Security
N. Harris, Principle Regulatory Compliance Specialist
F. Madden, Regulatory Affairs Manager
D. Volkening, Principle Nuclear Technologist

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000445; 05000446/2004007-01	NCV	Failure to continuously man the Central Alarm Station (Section 4OA5)
05000445; 05000446/2004007-02	NCV	Failure to control Safeguards Information (Section 4OA5)

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Section 3PP1: Access Authorization (71130.01)

Procedures and Instructions

NQA 3.14, "Control of Vendor Activities," Revision 13
STA-902, "Access to Protected and Vital Areas," Revision 16
STA-910, "Fitness For Duty Program," Revision 4
Corporate Security Procedure - Personnel Access Data System (PADS)

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Attachment

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CSO-301, "Security Clearance Program," Revision 8
SI-3.2, "Access Control," Revision 23

Corrective Action Documents

Smart Forms 2003-2657, 2003-2998, 2003-3160, 2004-0582, 2004-0693, 2004-0721,
2004-0723, 2004-0739

Audits and Assessments

QAA-03-022, "Audit of Fluor Background Investigation and Access Authorization Programs"
QAA-03-083, "NEI Audit of Westinghouse Access Authorization/Fitness-For-Duty Programs"
QAA-03-084, "NEI Audit of Siemens-Westinghouse Access Authorization Programs"
QAA-04-006, "2003 NEI Audit of Bartlett Nuclear, Inc. Access Authorization Program"
QAA-04-011, "2003 Choicepoint, Inc. Background Investigation Program Audit"
QAA-04-016, "2004 NEI Audit of INPO Access Authorization and Fitness-For-Duty Program"
EVAL-2004-002, "Security Access Authorization and Personnel Access Data System"

Other Documents

Safeguards Event Logs from June 2003 through April 2004

Credit History Guidelines

Reinvestigation Checklist Questions and Answers

Lesson Plan MT21.FFD.AT1, "Fitness for Duty"

NEI 03-01, "Nuclear Power Plant Access Authorization Program," Revision 1

NEI 03-02, "Access Authorization and Fitness-For-Duty Audit Program," Revision 1

NEI 03-05, "Personnel Access Data System Operating Manual," Revision 1

Order EA-02-261, "Issuance of Order for Compensatory Measures Related to Access
Authorization"

Security Event Logs from October 1, 2003, through March 31, 2004

PERS 210, "Processing of Personnel for General Site Access and/or Unescorted Access to the
Protected/Vital Area at CPSES," Revision 4

Position Assistance Documents

Task 363, "Notify"

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Task 383, "Emergency Classification"
Task 900, "Credible Threat"
Task 902, "Response to Vital Area Evacuation"

Section 3PP2: Access Control (71130.02)

Procedures and Instructions

STA-902, "Access to Protected and Vital Areas," Revision 16
STA-904, "Vehicle and Material/Package Control," Revision 12
STA-905, "Control of Security Keys and Key Card Badges," Revision 6
SEC-201, "Security Procedures During Refueling and Major Maintenance," Revision 7
SEC-302, "Personnel Identification, Badge Issuance, and Access Control," Revision 14
SEC-304, "Vehicle and Material Control," Revision 10
SEC-306, "Lock, Key, and Key Card Badge Control System," Revision 17
SEC-307, "Seal and Search Process," Revision 0
SI-1.0, "Common Instruction," Revision 11
SI-3.2, "Access Control," Revision 23
SI-3.1, "Owner Controlled Area," Revision 10
SI-3.3, "Vehicle/Material Delivery Control," Revision 10
SI-3.10, "Alarm Stations," Revision 21
SI-3.11, "Key Control," Revision 13
SI-3.13, "Key Card Control," Revision 20
SI-3.15, "Site Access Point," Revision 5
SI-4.0, "Compensatory and Contingency," Revision 12

Corrective Action Documents

Security Field Reports 1043-03, 1075-03, 1092-03, 1114-03, 1161-03, 1187-03, 1245-03, 1257-03, 1280-03, 0060-04, 0173-04, 0455-04, and 0468-04

Audits and Assessments

Eval-2004-001, "Security Administrative and Access Controls"
SA 2003-044, "Review of Security Visitor Access Records"

Other Documents

Safeguards Event Logs from June 2003 to April 2004
Biometric Alarm Response Job Aid
Access Level Form, Revision 11
Security Guideline 38, "Security Response," dated January 9, 2003

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Section 3PP8: Fitness-for-Duty (71130.08)

Procedures

SEC-118, "Work Hour Controls," Revision 0
Processing Work Hours Job Aid

Corrective Action Documents

Security Field Report 0210-04

Other Documents

CPSES - NRC Order EA-03-038 Work Hour Controls - Fatigue Training

Order EA-03-038, "Order for Compensatory Measures Related to Fitness-For-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel"

Reply to Response to Order for Fitness-For-Duty Enhancements For Nuclear Security Force Personnel

NEI Memorandum entitled, "Security Officer Work Hours Compensatory Measures," dated November 23, 2003

Eval-2004-001, "Security Administrative and Access Controls"

Individual work hour records for three individuals

Group work hour records for every 6-week period through April 9, 2004

Safeguards Event Logs from June 2003 through April 2004

Section 40A1: Performance Indicator Verification (71151)

Work Control Instruction WCI 701, "Performance Indicator Verification," Revision 4

Performance Indicator Job Aid

Selected intrusion detection system out of service hours verified from November 2003 to April 2004