

## DOCKETED

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<b>Project Title:</b>	El Segundo Power Redevelopment Project Compliance
<b>TN #:</b>	201583
<b>Document Title:</b>	Email regarding El Segundo Security Staffing
<b>Description:</b>	N/A
<b>Filer:</b>	Craig Hoffman
<b>Organization:</b>	CEC/ J. Adams
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El Segundo Energy Center

Security Concerns and Information

**From:** Fowler, Rex (Sergeant) [<mailto:RFowler@elsegundo.org>]  
**Sent:** Tuesday, November 19, 2013 9:05 AM  
**To:** Adams, Jim@Energy  
**Subject:** RE: Typical Security Conditions

Good morning Jim.

This looks very good. I'm sure the project will be a complete success.

Thank you for the information.

Sgt R Fowler  
El Segundo PD  
310 524 2298

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**From:** Adams, Jim@Energy  
**Sent:** Monday, November 04, 2013 1:02 PM  
**To:** 'Kim, Dan (Lieutenant)'; 'rfowler@elsegundo.org'  
**Subject:** Typical Security Conditions

Lieutenant Kim/Sergeant Fowler,

I appreciated you taking the time to respond to the law enforcement assessment form for the proposed El Segundo Power Facility Modification (ESPFM). You recommended extra security staffing though it wasn't clear if that should occur during demolition/construction and/or operation. I've attached an example of two conditions of certification that are typically included in staff's Hazardous Materials analysis regarding site security for projects like the ESPFM. Would these satisfy your concerns or is there something else you would recommend? Please respond to this e-mail at your earliest convenience.

Thank you,

Jim

**HAZ-7** Prior to commencing construction, a site-specific Construction Site Security

Plan for the construction phase shall be prepared and made available to the CPM for review and approval. The Construction Security Plan shall include the following:

1. perimeter security consisting of fencing enclosing the construction area;
2. security guards;
3. site access control consisting of a check-in procedure or tag system for construction personnel and visitors;
4. written standard procedures for employees, contractors and vendors when encountering suspicious objects or packages on site or off site;
5. protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency; and,
6. evacuation procedures.

**Verification:** At least thirty (30) days prior to commencing construction, the project owner shall notify the CPM that a site-specific Construction Security Plan is available for review and approval.

**HAZ-8** The project owner shall also prepare a site-specific security plan for the commissioning and operational phases that will be available to the CPM for review and approval. The project owner shall implement site security measures that address physical site security and hazardous materials storage. The level of security to be implemented shall not be less than that described below (as per NERC 2002).

The Operation Security Plan shall include the following:

1. permanent full perimeter fence or wall, at least eight feet high and topped with barbed wire or the equivalent (and with slats or other methods to restrict visibility if a fence is selected);
  2. main entrance security gate, either hand operated or motorized;
  3. evacuation procedures;
  4. protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency;
  5. written standard procedures for employees, contractors, and vendors when encountering suspicious objects or packages on site or off site;
- A. a statement (refer to sample, **Attachment A**), signed by the project owner certifying that background investigations have been conducted on all project personnel. Background investigations shall be restricted to determine the accuracy of employee identity and employment history and shall be conducted in accordance with state and federal laws regarding security and privacy;
- B. a statement(s) (refer to sample, **Attachment B**), signed by the contractor or authorized representative(s) for any permanent contractors or other technical contractors (as determined by the CPM after consultation with the project owner), that are present at any time

on the site to repair, maintain, investigate, or conduct any other technical duties involving critical components (as determined by the CPM after consultation with the project owner) certifying that background investigations have been conducted on contractors who visit the project site;

6. site access controls for employees, contractors, vendors, and visitors;
7. a statement(s) (refer to sample, **Attachment C**), signed by the owners or authorized representative of hazardous materials transport vendors, certifying that they have prepared and implemented security plans in compliance with 49 CFR 172.880, and that they have conducted employee background investigations in accordance with 49 CFR Part 1572, subparts A and B;
8. closed circuit TV (CCTV) monitoring system, recordable, and viewable in the power plant control room and security station (if separate from the control room) with cameras able to pan, tilt, and zoom, have low-light capability, and are able to view 100% of the perimeter fence, the ammonia storage tank, the outside entrance to the control room, and the front gate; and,
9. additional measures to ensure adequate perimeter security consisting of either:

- A. security guard(s) present 24 hours per day, 7 days per week; **or**
- B. power plant personnel on site 24 hours per day, 7 days per week, and perimeter breach detectors **or** on-site motion detectors.

The project owner shall fully implement the security plans and obtain CPM approval of any substantive modifications to those security plans. The CPM may authorize modifications to these measures, or may require additional measures such as protective barriers for critical power plant components—transformers, gas lines, and compressors—depending upon circumstances unique to the facility or in response to industry-related standards, security concerns, or additional guidance provided by the U.S. Department of Homeland Security, the U.S. Department of Energy, or the North American Electrical Reliability Council, after consultation with both appropriate law enforcement agencies and the applicant.

**Verification:** At least thirty (30) days prior to the initial receipt of hazardous materials on site, the project owner shall notify the CPM that a site-specific operations site security plan is available for review and approval. In the annual compliance report, the project owner shall include a statement that all current project employee and appropriate contractor background investigations have been performed, and that updated certification statements have been appended to the operations security plan. In the annual compliance report, the project owner shall include a statement that the operations security plan includes all current hazardous materials transport vendor certifications for security plans and employee background investigations.