

## DOCKETED

<b>Docket Number:</b>	16-AFC-01
<b>Project Title:</b>	Stanton Energy Reliability Center
<b>TN #:</b>	220620
<b>Document Title:</b>	Stanton Energy Reliability Center, LLC's Proposed Modifications to Condition of Certification HAZ-8
<b>Description:</b>	N/A
<b>Filer:</b>	Marie Fleming
<b>Organization:</b>	DayZen LLC
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	8/9/2017 3:21:44 PM
<b>Docketed Date:</b>	8/9/2017

## SERC Proposed Revision to Condition of Certification HAZ-8

On June 14, 2017, California Energy Commission Staff (Staff) sent a letter to Lieutenant Shawn Howell of the Orange County Sheriff Department seeking input on the Stanton Energy Reliability Center (SERC) Application For Certification (AFC). Staff included in the letter Condition of Certification **HAZ-8** as an example of a typical condition of certification included in CEC Final Decisions. Stanton Energy Reliability Center, LLC (SERC, LLC) agrees with almost all of the requirements contained in the **HAZ-8**. However, Staff's proposed version of **HAZ-8** does not reflect that the SERC will be an unmanned facility. Since there are no security standards that would require a facility such as SERC to be manned or have full-time security personnel on site 24 hours per day, 7 days per week, SERC, LLC has proposed the following revisions to Condition of Certification **HAZ-8** to reflect the security measures planned for the SERC for Staff's consideration. SERC, LLC's proposed additions are shown in ***bold and italic*** and deletions are shown in ~~strikethrough~~.

**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 ***site specific security plan*** level of security to be implemented shall ***include applicable security features from Security Guideline for the Electricity Sector: Physical Security and*** not be less than that described below (~~as per NERC-2002~~, ***Version 2.0, June 12, 2012***) ***and guided by prudent utility practice***.

The Operation Security Plan shall include the following:

1. permanent full perimeter fence or wall, at least eight feet high, ***with substation or switchyard fences*** ~~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. perimeter breach detectors or on-site motion detector capabilities; and**
  - B. security guard(s) present 24 hours per day, 7 days per week; or**
  - C. power plant personnel on site 24 hours per day, 7 days per week; or**
  - D. Continuous remote monitoring 24 hours per day, 7 days per week, with local duty personnel on-call 24 hours per day, 7 days per week, and capable of coordinating response actions with emergency response personnel and of arriving on-site within 90 minutes or less., 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 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.