

# FirstEnergy Nuclear Operating Company

Comments before the Joint Senate Consumer Protection and  
Professional Licensure Committee and Senate Veterans Affairs  
and Emergency Preparedness Committee Regarding  
Nuclear Issues

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**Pennsylvania Senate – Consumer Protection and Professional Licensure  
and  
Veteran Affairs and Emergency Preparedness Committees**

**FirstEnergy Testimony – October 16, 2007**

Good morning members of the Joint Committee. We are pleased to have the opportunity to provide information about the nuclear industry and FirstEnergy Nuclear Operating Company (FENOC). I have provided my remarks in the written testimony distributed to the committee yesterday.

FENOC is a wholly owned subsidiary of FirstEnergy Corp, headquartered in Akron, Ohio. FENOC is responsible for the operation of the Beaver Valley, Davis Besse and Perry nuclear power plants. The Beaver Valley Nuclear Plant, located in Shippingport, Pennsylvania, is the largest nuclear plant owned by FirstEnergy. Together these FENOC plants provide nearly 4000 megawatts of electrical energy without green house gas emissions.

FirstEnergy is strongly committed to the safe and secure operation of our nuclear plants, including a high level of emergency preparedness.

Security and emergency preparedness have been areas of elevated industry focus following the events of September 11, 2001. The security and emergency preparedness programs for nuclear plants have always played a vital role in ensuring public health and safety, even prior to these events, but there have been significant steps taken to make these programs even more robust over the past six years. These enhancements include a significant increase in the number of armed security officers, more widespread use of formidable physical security features and intruder detection systems and improved security training programs. The nuclear industry has worked in coordination with the Nuclear Regulatory Commission (NRC) and Department of Homeland Security (DHS) to critically examine the protective strategies, structures, equipment, resources and processes to further strengthen the security of nuclear plants. The number of

security officers working at the nation's 64 nuclear plant sites has increased 60 percent since 2001, to more than 8,000. The Industry has spent an estimated \$1.5 billion on security improvements since September, 2001. FirstEnergy has spent approximately \$45 million additional dollars on security at Beaver Valley Power Station since September, 2001.

Nevertheless, numbers tell only part of the story. The nuclear energy industry, the federal government and local policymakers are working together to ensure nuclear plants remain one of the most secure industrial facilities in the United States. The industry's effective safety and security efforts do not rely upon any one measure or approach. Instead, they are based on three interrelated elements that provide defense in depth.

- The first is structural security to ensure that buildings, vehicles and storage facilities at nuclear plants represent strength in design.
- Second, automated security providing continuous monitoring and detection functions.
- Third, the physical presence and intervention of paramilitary security officers support and enhance the structural and automated security measures.

Together, these measures represent a comprehensive effort to prevent intrusion and sabotage at our nuclear plants.

The industry emergency preparedness programs have also evolved to provide an effective response in a hostile threat environment. Emergency preparedness program changes have been made to integrate the heightened security measures at the nuclear plants and provide for strong coordination with offsite partners such as local law enforcement, fire departments and emergency management agencies.

Security and emergency preparedness capabilities and procedures are evaluated by NRC and DHS – FEMA using expert teams.

- A Nuclear Regulatory Commission evaluated security force-on-force exercise is conducted at each nuclear station every three years. These evaluations involve multiple mock attack exercises designed to test the site's protective strategy and its ability to effectively protect the health and safety of the public.
- A joint Nuclear Regulatory Commission and Federal Emergency Management Agency evaluated emergency preparedness exercise is conducted at each nuclear station every two years and includes the involvement of State, County and local response organizations to ensure plans and procedures can be effectively implemented should there be a significant event at the nuclear station.

We, as an industry, have worked diligently to develop new standards, guidance and regulations to improve overall security and preparedness. We are committed to improve our programs based upon lessons learned from events within or outside the nuclear industry. We will continue to identify opportunities to further strengthen our programs through the conduct of critical reviews and challenging exercises.

FirstEnergy Nuclear Operating Company actively participates in various working groups to share operating experiences and initiatives to strengthen our programs. Some examples of the working groups are as follows:

- Pennsylvania Utility Group – which includes representatives from Pennsylvania Emergency Management Agency and Department of Environmental Protection – Bureau of Radiation Protection, Exelon, Pennsylvania Power and Light and FirstEnergy Nuclear Operating Company
- Tri-State Working Group – includes representatives from Pennsylvania (PEMA and DEP-BRP), West Virginia Department of Homeland Security and Ohio Emergency Management Agency
- Nuclear Regulatory Commission Region I (Northeast U.S.- six states region) and Region III (Midwest U.S. – six state region) Security and Emergency Preparedness Utility Groups
- Nuclear Energy Institute - Security Working Group and associated task forces
- Nuclear Energy Institute - Emergency Preparedness Task Force
- Institute of Nuclear Power Operations (INPO) – Emergency Preparedness Task Force

Some examples of Industry, NRC and DHS – FEMA initiatives to identify and implement enhancements for plant security and to ensure an integrated emergency preparedness program with offsite agencies are as follows:

- Department of Homeland Security and Nuclear Regulatory Commission completed Comprehensive Reviews of integrated offsite response and security assessments at all three FirstEnergy Nuclear Operating Company plants with the Beaver Valley Power Station review conducted in May of this year. The federal agencies, agencies of the Commonwealth of Pennsylvania, County and local participation during this review was significant.
- FirstEnergy Nuclear Operating Company is represented on the Nuclear Sector Coordinating Council under the DHS structure. The overarching mission of the Council is to work with DHS for the protection of the commercial nuclear industry in a hostile threat environment.
- NRC evaluated Force-on-Force drills continue to be conducted and provide significant challenges to test the station security organization, equipment and processes.
- A new type of emergency preparedness drill involving response to a hostile threat scenario was conducted at FirstEnergy's Perry Nuclear Power Plant on September 12, 2007. The drill involved nearly 400 plant employees, local law enforcement, fire department agencies, mutual aid, the National Incident Management System and County and State emergency management agencies. The drill is part of a voluntary industry program to practice integrated response to a hostile event. Beaver Valley and Davis-Besse Nuclear Power Stations will conduct similar drills over the next two years as part of this industry initiative.

We hope this brief discussion of our industry involvement and participation in new initiatives gives you a sense of our commitment to provide the high level of security and emergency response preparedness to ensure public health and safety in this new environment.

FirstEnergy Nuclear Operating Company understands the importance of electrical generation as a critical infrastructure for this country and for our customers. We are committed to ensure the safe and secure operation of our nuclear fleet to fulfill those responsibilities.