



Compliance Spot Check Report Public Version

**Exelon Generation Company, LLC
Exelon Nuclear
(NCR00778)**

**Confidential Information (including Privileged and
Critical Energy Infrastructure Information) –
Has Been Removed**

Date of Spot Check: April 12, 2011

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Executive Summary

A compliance spot check of Exelon Generation Company, LLC-Exelon Nuclear (Exelon Nuclear) (NCR00778) was conducted on April 12, 2011. At the time of the spot check, Exelon Nuclear was registered for the Generator Owner (GO) and Generator Operator (GOP) functions.

The spot check team evaluated Exelon Nuclear for compliance with two requirements of one standard in the 2011 NERC Compliance Monitoring and Enforcement Program (CMEP). The spot check team assessed compliance with one NERC Reliability Standard NUC-001, Requirements 1 and 2 for the period of April 1, 2010 to April 12, 2011. Exelon Nuclear submitted information and documentation for the spot check team's evaluation of compliance with these requirements. The spot check team reviewed and evaluated all information provided by Exelon Nuclear to assess compliance with NUC-001-2 Requirements 1 and 2 applicable to Exelon Nuclear.

The spot check team did not discover areas of non-compliance based on the evidence presented by the registered entity and reviewed by the spot check team.

These spot check results are further explained in the Spot Check Results Findings section of this report. This includes detailed information of the spot check team's findings of applicability and compliance for the NERC Reliability Standard requirements within the scope of the compliance spot check. Any Possible Violations will be processed through the NERC and SERC Reliability Corporation (SERC) CMEP. There were no ongoing or recently completed mitigation plans concerning NUC-001 and therefore no mitigation plans were reviewed by the spot check team.

The SERC spot check team lead certifies that the spot check team adhered to all applicable requirements of the NERC Rules of Procedure (ROP) and Compliance Monitoring and Enforcement Program (CMEP) for spot checks.

Spot Check Process

The compliance spot check process steps are detailed in the SERC CMEP. The SERC CMEP generally conforms to the United States Government Accountability Office Government Auditing Standards and other generally accepted audit practices.

Objectives

All registered entities are subject to a spot check for compliance with any reliability standards applicable to the functions for which the registered entity is registered.¹ The spot check objectives are to:

- Review compliance with the requirements of reliability standards that are applicable to Exelon Nuclear, based on the functions that Exelon Nuclear is registered to perform and identified in the spot check detail letter;

¹ North American Electric Reliability Corporation CMEP, paragraph 3.1, Compliance Audits
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- Validate compliance with applicable reliability standards from the NERC 2011 Implementation Plan list of actively monitored standards, and additional NERC Reliability Standards selected by SERC;
- Validate compliance with applicable regional standards from the SERC 2011 Implementation Plan list of actively monitored standards;
- Review the status of mitigation plans for the standards in scope of the spot check.

Scope

The scope of the compliance spot check included one NERC Reliability Standards from the SERC 2011 Implementation Plan and identified as a NERC 2011 Actively Monitored Reliability Standard.

At the time of the spot check, Exelon Nuclear was registered for the of Generator Owner (GO) and Generator Operator (GOP) functions that apply to the NUC-001-2 standard.. The spot check team evaluated Exelon Nuclear for compliance during the period of the lesser of: 1) date of registration to date of audit exit presentation; 2) date of last audit or spot check to date of audit exit presentation; or, 3) mandatory effective date of the applicable standard to date of audit exit presentation.

Confidentiality and Conflict of Interest

Confidentiality and Conflict of Interest of the spot check team are governed under the SERC Delegation Agreement with NERC, and Section 1500 of the NERC Rules of Procedure. Exelon Nuclear was informed of SERC's obligations and responsibilities under the agreement and procedures. The work history for each spot check team member was provided to Exelon Nuclear. Exelon Nuclear was given an opportunity to object to a spot check team member's participation on the basis of a possible conflict of interest or the existence of other circumstances that could interfere with a spot check team member's impartial performance of duties. Exelon Nuclear had not submitted any objections by the stated twenty-five day objection due date and accepted the spot check team member participants without objection. There have been no denials of or access limitations placed upon this spot check team by Exelon Nuclear.

Methodology

The spot check team reviewed the information, data, and evidence submitted by Exelon Nuclear and assessed compliance with requirements of the applicable reliability standards. Submittal of information and data were sent to SERC 15 days before the scheduled date of the entity review. Additional information relevant to the spot check could be submitted until the conclusion of the spot check.

The spot check team reviewed documentation provided by Exelon Nuclear. Data, information, and evidence submitted in the form of policies, procedures, emails, logs, studies, data sheets, etc. were validated, substantiated, and cross-checked for accuracy as appropriate. Requirements which required a sampling to be conducted were developed based upon the significance of the sampling to the reliability of the bulk electric system (BES).

Findings were based on the spot check team's knowledge of the BES, the NERC Reliability Standards, and their professional judgment. All findings were developed based upon the consensus of the spot check team.

Company Profile

Exelon Corporation, a Fortune 500 company with more than \$18 billion in annual revenues, is one of the nation's largest electric utilities. It distributes electricity to approximately 5.4 million customers in Pennsylvania and Illinois; and distributes gas to 490,000 customers in the Philadelphia area.

Exelon Generation Company, LLC is a second-tier subsidiary of Exelon Corporation. Exelon Generation consists of nuclear, fossil, hydro, and renewables in the Mid-Atlantic, Midwest, Northeast, and Texas. Exelon Generation's nuclear division operates the largest nuclear fleet in the nation and the third largest fleet in the world. Exelon's 10 stations – with 17 reactors – represent approximately 20 percent of the U.S. nuclear industry's power capacity. Exelon Generation Company, LLC - Exelon Nuclear is registered as a Generator Operator and Generator Owner (NCR00778). Clinton Power Station is Exelon's only nuclear station within the SERC Region.

Clinton Power Station is located in Central Illinois, in the middle of a triangle of the cities of Bloomington/Normal to the north, Champaign/Urbana to the east, and Decatur to the south. The station is located just six miles east of Clinton, Ill. in DeWitt County. The station is built on a 14,300-acre site, and its 5000-acre cooling lake was formed by building a dam at the convergence of Salt Creek and the North Fork of Salt Creek. Clinton Power Station provided electricity to customers for the first time on April 24, 1987 and reached 100 percent power on September 15, 1987. Clinton Power Station's reactor was designed by General Electric. The unit is capable of generating nearly 1,078 net megawatts.

Exelon Generation Company (Clinton Power Station) has entered into a Nuclear Plant Operating Agreement (NPOA) with Ameren IP and the Midwest Independent Transmission System Operator (Midwest ISO). Ameren Service Company is the registered Transmission Owner/Operator that connects with Clinton Power Station and provides interconnection services for Clinton. Midwest ISO is the Transmission Service Provider, Reliability Coordinator, and Balancing Authority for Clinton Power Station.

Spot Check Participants

The following is a listing of all personnel from the Spot Check Team and Exelon Nuclear who were present during the meetings or interviews.

Spot Check Team Participants

Role	Title	Entity
Spot Check Team Lead	Senior Compliance Auditor	SERC
Team Member	Senior Compliance Auditor	SERC

Exelon Nuclear Spot Check Participants

Title	Entity
Compliance Manager	Exelon Nuclear
Senior Staff Engineer	Exelon Nuclear
Engineering Manager	Exelon Nuclear (Clinton Power Station)
Operations Manager	Exelon Nuclear (Clinton Power Station)
Corporate Operations	Exelon Nuclear

Spot Check Results

The spot check team evaluated Exelon Nuclear for compliance with two requirements of one standard in the 2011 NERC Compliance Monitoring and Enforcement Program (CMEP). The spot check reviewed NERC Reliability Standard NUC-001-2 Requirements 1 and 2 for the period of April 1, 2010 to April 12, 2011. Exelon Nuclear submitted information and documentation for the spot check team's evaluation of compliance with these requirements. The spot check team reviewed and evaluated all information provided by Exelon Nuclear to assess compliance with NUC-001-2 Requirements 1 and 2 applicable to Exelon Nuclear at this time.

The spot check team did not discover areas of non-compliance based on the evidence presented by the registered entity and reviewed by the spot check team.

Findings

The following table details the findings for compliance for the scope identified for this spot check.

Reliability Std.	Req.	Finding
NUC-001-2	R1.	No Findings
NUC-001-2	R2.	No Findings