FEDERAL ENERGY REGULATORY COMMISSION OFFICE OF ENERGY PROJECTS DIVISION OF DAM SAFETY AND INSPECTIONS NEW YORK REGIONAL OFFICE

19 WEST 34TH STREET - SUITE 400 NEW YORK, NEW YORK 10001

Telephone No. (212) 273-5900 FAX No. (212) 631-8124

November 21, 2001

Re: Security Measures

Dear

Since September 11, 2001, security of our Nation's infrastructure is a top priority as demonstrated by the establishment of the Department of Homeland Security. During this time, security alerts announced by the FBI and others have provided information on potential threats and requested that everyone be aware and vigilant with respect to terrorist threats.

Recent events have prompted the hydroelectric industry to re-assess the security needs of their entire infrastructure inventory and implement widespread security improvements. However, there are not enough resources available to make every facility fully secure. Therefore, it is appropriate that each facility owner prioritize their facilities so that the proper level of security measures are initiated at the most critical projects to properly protect people living downstream and the most critical infrastructure. FERC's Division of Dam Safety and Inspections continues to learn of better ways of responding to security threats, and has taken the following steps to better provide rapid security threat notifications:

1. We are establishing links with the Domestic Terrorist section of the FBI in order to efficiently and effectively receive and relay credible threat alerts more rapidly. Our goal is to give you this information to enable you to take any additional necessary steps to protect your projects as necessary.

2. We have reviewed all dams under FERC jurisdiction and categorized them into 3 groups according to the potential as a terrorist target and the potential consequences arising from terrorist activity. The groups are labeled Security 1, Security 2 and Security 3, with Security 1 having the most potential as a target and the most severe consequences, and Security 3 to have little to no consequences.

The parameters considered in developing the Security groups were:

- Low hazard potential dams, except for special circumstances at a few large low hazard potential dams, are Security 3.
- All high and significant hazard potential dams were initially assigned to the Security 2 group. They were then considered for the highest group, Security 1, based on reservoir storage, installed capacity, downstream population centers (categorized as high, moderate, or low), and other factors including large cities, military complexes, nuclear plants, and water supplies that could be affected by each dam.

The list of your dams associated with each group are shown in Enclosure 1. Please review this list. If you believe that any of the listed dams should be in a different group or if a dam was omitted, please identify that dam and the group under which it should be listed. Please offer your suggestions to this office as soon as possible.

3. We are refining our procedures for E-mail notifications of threat alerts. For those licensees/exemptees with E-mail addresses, when FERC receives a threat alert, we will contact a representative of each FERC jurisdictional dam via E-mail. We will be as specific as possible to the threat or situation. Please note that regardless of the security level of your dams, you will receive an E-mail notice so that you can act appropriately based upon the Security group your dam is in and the issued alert.

Below is the proposed standard format for any E-mail message you would receive giving you information on an announced alert. Please let us know if you have any questions concerning this proposed message or other thoughts on the content of the message:

"Please respond back via E-mail reply that you have received this

message:

Security Threat Alert:
The ____(organization) ____ has issued the following security notice on ____(date/time) :
____' ...message...'

Considering the information in our letter to you dated November 21, 2001 please take notice of this alert and evaluate the current status of your security at all your hydro-related facilities in accordance with their Security group established in that letter and ensure that the level of security at these facilities is appropriate for this security alert.

The Dam Safety Subcommittee to the Hydraulic Power Committee of the National Hydropower Association has developed a list of suggested security measures for dam owners and operators. This document is provided as Enclosure 2.

In summary we are requesting that you:

- Review Enclosure 1 for completeness and let us know if you believe there should be any changes
- Identify any of your dams omitted and let us know what Security group it should be listed under and why
- Review the proposed E-mail message and let us know if you have any additional suggestions

Please submit your responses to our above requests by December 14, 2001. We appreciate your continuing cooperation and input concerning dam safety matters associated with your dam(s). If you have any questions, please telephone Mr. Peter Valeri at (212) 273-5930.

Sincerely,

Anton J. Sidoti Regional Engineer

(Enclosure 1 not included in posted letter)

Enclosure 2

Hydro Plant Security Measures

A Laundry List of Suggested Security Measures For Dam Owners and Operators

Developed by the National Hydropower Association – Hydraulic Power Committee Prepared by: Tommy Duncan-Southern Company October 18, 2001

At All Sites

- Categorize/prioritize structures by potential impact (i.e., loss of life, loss of critical services, extensive property damage, etc.). Focus efforts on those structures which have serious impacts should failure occur.
- Assess vulnerabilities. Identify critical components of the project that could result in large, uncontrolled releases of water (spillway gates, penstocks, valves, etc.)
- Consider development of "security plans" that cover "normal operations" and various states of "emergency alerts".
- Review and update Emergency Action Plans to make sure telephone numbers are correct and support personnel are familiar with the EAP.
- Talk to employees about the potential threats. Have plant staff be on the "look-out" for unusual activities or personnel on project sites. Call police or supervisory personnel to inform them of any unusual activities. Plant staff should not confront individuals or attempt to detain them.
- Consider performing a "self audit" of the project security features such as fences, gates, alarm systems, and early warning devices. Check functionality of existing "early detection" systems such as "intrusion alarms", "headwater alarms, and tailwater alarms".
- Consider increasing frequency of walkdowns of project areas.
- Restrict "unauthorized" access to sites. Consider modifying procedures for contract personnel and other visitors to better keep track of who is on site.
- Work with the FERC to make sure that communications regarding "alerts" are passed from law enforcement agencies to the appropriate company personnel. This may be by providing contact names or direct links to control centers.
- Make sure normally locked gates are locked. Make sure automatic gates function properly.
- Consider restricting access to public areas near the dam if necessary for security.

- Work with law enforcement personnel to patrol and enforce "no boating" areas near dam and provide more frequent patrol during periods of higher risk.
- Where necessary and practical, work with appropriate law enforcement personnel to limit large trucks from driving across the dam.
- Review "black start" procedures if applicable to the project.

At Remote Sites

- Consider installation of "intrusion alarms" and cameras at unmanned sites.
- Work with local law enforcement to increase drive by surveillance.
- Consider "fly-overs" of project facilities to supplement surveillance.
- Consider staffing high risk, remotely located projects during periods of higher alert or consider implementation of a "roving" surveillance crew.