



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

May 31, 2018

Mr. Charles Arnone
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: BIG ROCK POINT INDEPENDENT SPENT FUEL STORAGE INSTALLATION—
SECURITY INSPECTION REPORT 07200043/2018401

Dear Mr. Arnone:

On May 3, 2018, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection of the Physical Protection Program for the Big Rock Point Independent Spent Fuel Storage Installation located in Charlevoix, Michigan. The NRC inspectors discussed the results of this inspection with Mr. Horan and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspectors did not identify any finding or violation of more-than-minor significance.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.htm> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* (CFR), Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

If you choose to provide a response that contains Security-Related Information, please mark your entire response "Security-Related Information—Withhold from public disclosure under 10 CFR 2.390" in accordance with 10 CFR 2.390(d)(1) and follow the instructions for withholding in 10 CFR 2.390(b)(1). The NRC is waiving the affidavit requirements for your response in accordance with 10 CFR 2.390(b)(1)(ii).

C. Arnone

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA Gregory Hansen Acting for/

Steven K. Orth, Chief
Plant Support Branch
Division of Reactor Safety

Docket No. 72-043
License No. General License (ISFSI)

Enclosure:
IR 07200043/2018401

cc: Distribution via LISTSERV®

Letter to Charles Arnone from Steven K. Orth dated May 31, 2018

SUBJECT: BIG ROCK POINT INDEPENDENT SPENT FUEL STORAGE INSTALLATION—
SECURITY INSPECTION REPORT 07200043/2018401

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 72-043
License No: General License (ISFSI)

Report No: 07200043/2018401

Enterprise Identifiers: I-2018-401-0047

Licensee: Entergy

Facility: Big Rock Point—Independent Spent Fuel Storage
Installation (ISFSI)

Location: Charlevoix, Michigan

Dates: May 1, 2018, through May 3, 2018

Inspector: E. Bonano, ISFSI Physical Security Inspector
G. Hansen, Senior EP Inspector

Approved by: S. Orth, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission continued monitoring the licensee's performance by conducting an inspection of the Physical Protection Program for the Independent Spent Fuel Storage Installation, in accordance with the Spent Fuel Storage Oversight Process. The Spent Fuel Storage Oversight Process is the U.S. Nuclear Regulatory Commission's program for overseeing the safe storage of spent nuclear fuel. Refer to <https://www.nrc.gov/waste/spent-fuel-storage/oversight.html> for more information.

List of Findings and Violations

No findings or violations were identified.

Additional Tracking Items

None

INSPECTION SCOPES

Inspection was conducted using the appropriate portions of the Inspection Procedure 81311, “Physical Security Requirements for Independent Spent Fuel Storage Installations.” The procedure was declared complete when the inspection procedure requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2690, “Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings.” The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

SAFEGUARDS

81311—Physical Security Requirements for Independent Spent Fuel Storage Installations (Complete)

The inspectors evaluated the Physical Protection Program for the Independent Spent Fuel Storage Installation. The following elements were evaluated:

02.01 (a–f)

INSPECTION RESULTS

No findings or violations were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors confirmed that proprietary information was controlled to protect from public disclosure. The inspectors verified no proprietary information was retained or documented in this report.

- On May 3, 2018, the inspectors presented the security inspection results to Mr. Horan and other members of the licensee staff.

DOCUMENTS REVIEWED

81311—Physical Security Requirements for Independent Spent Fuel Storage Installations

- Volume 1 – D1.13; Big Rock Point Access Authorization Program for Company/Noncompany Employees; Revision 12
- Volume 7F; Independent Spent Fuel Storage Installation (ISFSI) Security Plan; Revision 7
- Volume 7G; ISFSI Security Implementing Procedures, Chapter 1—Security Organization; Revision 8
- Volume 7G; ISFSI Security Implementing Procedures, Chapter 2—Facility Environs; Revision 8
- Volume 7G; ISFSI Security Implementing Procedures, Chapter 3—Protected Area Perimeters; Revision 8
- Volume 7G; ISFSI Security Implementing Procedures, Chapter 4—Central Alarm Station; Revision 8

- Volume 7G; ISFSI Security Implementing Procedures, Chapter 5—Test, Inspections and Maintenance; Revision 8
- Volume 7G; ISFSI Security Implementing Procedures, Chapter 6—Security Records; Revision 8
- Volume 7G; ISFSI Security Implementing Procedures, Chapter 7—Security Audits; Revision 8
- Big Rock Point Independent Spent Fuel Storage Installation (ISFSI) Authorized Unescorted Personnel List; 04/2015 through 04/2018
- Big Rock Point ISFSI Work Request Log; CY 2016 through CY 2018
- Weapons Monthly Maintenance Logs; 01/2017 through 12/2017
- Independent Spent Fuel Storage Installation Security Systems Maintenance Log Weekly Testing; 01/2017 through 12/2017
- Big Rock Point Security Self-Assessment - 2016; 04/27/16
- Big Rock Point Security Self-Assessment - 2018; 03/7/18
- QA-3-7-9-14-16-18-2015-BRP-1; Entergy, Palisades Power Plant Quality Assurance Audit Report – Big Rock Point; 09/17/2015 through 10/26/2015
- QA-3-7-9-14-16-18-2017-BRP-1; Entergy, Palisades Power Plant Quality Assurance Audit Report – Big Rock Point; 09/05/2017 through 09/28/2017
- Glock Armorer Certification; 02/09/2016
- Remington M/870 Police Armorer’s Course Certification; 07/25/2017
- National Rifle Association Law Enforcement Firearm Instructor Certification (Handgun and Shotgun); Expiration 11/18/2020
- Security Officer CY 2017 and CY 2018 Individual Qualification Records (Sample 6 Security Officers)
- IEPIP 35A-02; Independent Spent Fuel Storage Installation (ISFSI) Emergency Response Organization Responsibilities; Revision 19
- IEPIP 35A-02, Table 5.0.1; Emergency Action Levels (EALs); Revision 19
- State of Michigan, Department of State Police, Post Commander, Gaylord Post, Letter of Agreement; 12/18/2017
- Office of the Sheriff, Charlevoix County, Letter of Agreement; 12/18/2017
- ISFSI Semi Annual Key Inventory; 01/2016 through 05/2018
- ISFSI Semi Annual Key and Padlock Inventories; 01/2016 through 05/2018
- ISFSI Semi Annual Protected Area Key Inventory; 01/2016 through 05/2018
- Semi Annual Safeguards Combination Locks Inventory; 01/2016 through 05/2018
- CR-PLP-2018-00058; Loss of Alarm Capabilities and Remote Monitor Function; 01/04/2018
- CR-PLP-2018-00398; Security Remote Monitor Out of Service; 01/23/2018
- CR-PLP-2018-00926; Security Officer did not Receive a Passing Score on a Requalification Exam; 02/22/2018
- CR-PLP-2018-02003; Security Officer did not Receive a Passing Score on a Requalification Exam; 04/25/2018