UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

May 20, 2019

Mr. Bryan C. Hanson
Senior VP, Exelon Generation Company, LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2—NRC SECURITY BASELINE INSPECTION REPORT 05000456/2019411; 05000457/2019411

Dear Mr. Hanson:

On April 12, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Braidwood Station, Units 1 and 2, and discussed the results of this inspection with Ms. Marri Marchionda and other members of your staff. The results of this inspection are documented in the enclosed report.

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

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html 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).

Sincerely,

/RA/

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

Docket Nos. 05000456; 05000457
License Nos. NPF–72; NPF–77

Enclosure:
IR 05000456/2019411; 05000457/2019411

cc: Distribution via LISTSERV®

Letter to Bryan C. Hanson from Steven K. Orth dated May 20, 2019.

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2—NRC SECURITY BASELINE INSPECTION REPORT 05000456/2019411; 05000457/2019411

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ROPreports.Resource@nrc.gov

DOCUMENT NAME: BRAI 2019 411 (DRS-J.Kutlesa).docx
ADAMS ACCESSION NUMBER: ML19140A450

☒ SUNSI Review Complete By: J. Kutlesa		ADAMS ☒ Yes ☐ No	☒ Publicly Available ☐ Non-Publicly Available		☒ Non-Sensitive ☐ Sensitive	Keyword: NRC 002	
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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers:	05000456; 05000457
License Numbers:	NPF-72; NPF-77
Report Numbers:	05000456/2019411; 05000457/2019411
Enterprise Identifier:	I-2019-411-0019
Licensee:	Exelon Generation Co., LLC
Facility:	Braidwood, Units 1 and 2
Location:	Braceville, IL 60407
Inspection Dates:	March 4, 2019, to April 12, 2019
Inspector:	J. Kutlesa, Physical Security Inspector
Approved By:	Steven K. Orth, Chief Plant Support Branch Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a Security Baseline inspection at Braidwood Station, Units 1 and 2 in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information. Findings and violations being considered in the NRC's assessment are summarized in the table below.

List of Findings and Violations

No findings or violations were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspector 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

71130.02 - Access Control

The inspector evaluated the Security Access Control Program. The following elements were evaluated from this IP:

Access Control (1 Sample)

- Tier I: All
- Tier II: 02.06(a, b, c, d); 02.07(a); 02.08(d, f, g h)
- Tier III: All

71130.06 - Protection of Safeguards Information

The inspector evaluated the Safeguards Information Protection Program. The following elements were evaluated from this IP:

Protection of Safeguards Information (1 Sample)

- Tier I: All
- Tier II: 02.05(a, b); 02.06(a, b); 02.08(a, b, c)
- Tier III: All

71130.07 - Security Training

The inspector evaluated the nuclear Security Training Program. The following elements were evaluated from this IP:

Security Training (1 Sample)

- Tier I: All
- Tier II: 02.05(a, b, c); 02.06(a, b); 02.07(a)
- Tier III: 02.10; 02.11(a); 02.12(a, b); 02.13(a, b, c)

71151 - Performance Indicator Verification

The inspector verified licensee Performance Indicators submittals listed below:

PP01: Protected Area Security Equipment Performance Index Sample (IP Section 02.17) (1 Sample)

January 2018 through March 2019

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspector confirmed that proprietary information was controlled to protect from public disclosure.

- On April 12, 2019, the inspector presented the Security Baseline Inspection results to Ms. Marri Marchionda and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Corrective Action Documents	AR 04194953	Security Issue	11/14/2018
	Corrective Action Documents Resulting from Inspection	AR 04227177	Perform a Review of OCA Warehouse Process	03/07/2019
	Miscellaneous		Braidwood Station Physical Security Plan	Revision 16
		SY-AA-101-155-F-01	Safeguards Event Report	September 2018 through March 2019
	Procedures	SY-AA-101-112	Exelon Security Search Processes	Revision 36
		SY-AA-101-112-1004	Protected Area Search Process	Revision 2
		SY-AA-101-112-1005	Owner-Controlled Area Inspection Processes	Revision 2
		SY-AA-101-117	Processing and Escorting of Personnel and Vehicles	Revision 29
		SY-AA-101-120	Control of Security Access Control Devices	Revision 9
		SY-AA-101-132-F-02	Two-Person Line of Sight Implementation Checklist	Revision 2
		SY-BR-101-112	Braidwood Search Operations	Revision 14
		SY-BR-101-119	Warehouse Process of Packages and Cargo	Revision 6
	Self-Assessments	NOSA-BRW-19-02 (AR 4209509)	Nuclear Oversight Security Programs Audit Report	02/06/2019
71130.06	Corrective Action Documents Resulting from Inspection	AR 04227355	NRC Identified Security Issue	03/07/2019
	Procedures	SY-AA-101-106	Control and Classification of Safeguards Information and Sensitive Unclassified Non-Safeguards Information	Revision 20
		SY-AA-101-106-1002	Use of Encryption Software for Safeguards Information	Revision 4

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.07	Miscellaneous	Daylight Rifle Qualification - 27D	NRA Live Fire Course Approval Letter	07/13/2017
		Night Fire Rifle Qualification	NRA Live Fire Course Approval Letter	04/20/2018
		Thermal Rifle Qualification	NRA Live Fire Course Approval Letter	04/20/2018
	Procedures	HR-AA-07-110	Nuclear Security Medical Examination	Revision 15
		SY-AA-150	Nuclear Security Training Program	Revision 4
		SY-AA-150-1009	Firearms Practice Range Management	Revision 0
		SY-AA-150-101	Exelon Nuclear Security Training	Revision 0
		SY-AA-150-102	Security Drills and Exercises	Revision 0
		SY-AA-150-104	Exelon Nuclear Security OJT Program	Revision 0
		SY-AA-150-105	Exelon Nuclear Security; Physical Fitness Test, Development, Approval and Conduct	Revision 0
		SY-AA-152	Tactical Course Development, Approval and Conduct	Revision 6
71151	Miscellaneous	INPO Braidwood Performance Indicator Website	PA Security Equipment Performance Indicator	April 2018 through March 2019
	Procedures	LS-AA-2160	Monthly Data Elements for NRC Protected Area (PA) Security Equipment Performance Index	Revision 4