



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

October 29, 2020

Ms. Mary Fisher  
Vice President, Energy Production and  
Nuclear Decommissioning  
Omaha Public Power District  
Fort Calhoun Station, Mail Stop FC-2-4  
9610 Power Lane  
Blair, NE 68008

SUBJECT: FORT CALHOUN STATION - INDEPENDENT SPENT FUEL STORAGE  
INSTALLATION, PHYSICAL SECURITY REQUIREMENTS FOR  
INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS INSPECTION  
REPORT 07200054/2020401

Dear Ms. Fisher:

On October 8, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Fort Calhoun Station independent spent fuel storage facility. The NRC inspector discussed the results of this inspection with Mr. T. Uehling, Sr., Director Decommissioning, and other members of your staff. The results of this inspection are documented in the enclosed report.

No violations of significance were noted and no response to this letter is required.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosure and your response, if you choose to provide one, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Document Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room). To the extent possible, your response, if you choose to provide one, should not include

any security related, personal privacy, or proprietary information so that it can be made available to the public without redaction.

Sincerely,

Ray L. Kellar, P.E., Chief  
Plant Support Branch 1  
Division of Reactor Safety

Docket No. 07200054

Enclosure:  
As stated

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FORT CALHOUN STATION - INDEPENDENT SPENT FUEL STORAGE INSTALLATION  
 PHYSICAL SECURITY REQUIREMENTS FOR INDEPENDENT SPENT FUEL STORAGE  
 INSTALLATIONS INSPECTION REPORT 07200054/2020401 – October 29, 2020

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**U.S. NUCLEAR REGULATORY COMMISSION**  
**Inspection Report**

Docket Number: 07200054

License Number: DPR-40

Report Number: 07200054/2020401

Enterprise Identifier: I-2020-401-0007

Licensee: Omaha Public Power District

Facility: Fort Calhoun Station

Location: Blair, NE

Inspection Dates: October 5, 2020 to October 8, 2020

Inspectors: D. Holman, Senior Physical Security Inspector

Approved By: Ray L. Kellar, P.E., Chief  
Plant Support Branch 1  
Division of Reactor Safety

Enclosure

## **SUMMARY**

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a Baseline Security Inspection at the Fort Calhoun Station, in accordance with Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations."

### **List of Violations**

No violations of more than minor significance were identified.

## INSPECTION SCOPES

Inspections were conducted using Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations," and review of general license requirements contained in the approved safety evaluation report (SER), the approved physical security plan (PSP), and applicable ISFSI security orders. 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.

### 81311 - Physical Security Requirements for Independent Spent Fuel Storage Installations

#### 1. Inspection Scope

- The inspector verified that spent nuclear fuel (SNF) is stored only within a protected area (PA). (72.212(9))
- The inspector verified that only individuals who are authorized to enter the PA are granted access to the PA. (72.212(9), SER/PSP)
- The inspector verified that the licensee is in compliance with site-specific security orders (e.g., additional security measures) for access authorization and fingerprinting; and that a log of authorized individuals is maintained. (SER/PSP)
- The inspector verified that the licensee can detect and assess penetrations through the isolation zone. (72.212(9))
- The inspector verified that the licensee can provide timely communication to the designated response force whenever necessary. (72.212(9), SER/PSP)
- The inspector verified that the physical protection system is designed to protect against loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose described in 10 CFR 72.106(b). (SER/PSP)
- The inspector verified that the licensee has retained a copy of the physical protection plan for a period of three years or until termination of the license. (72.212(9), SER/PSP)
- The inspector verified that the licensee complies with the provisions for physical protection systems, components, and procedures that meet the performance capabilities of 72.212(9), the SER, and the PSP.
- The inspector verified that the licensee's SNF and high-level radioactive waste are stored only within a PA so that access to this material requires passage through or penetration of two physical barriers. One barrier at the perimeter of the PA and one barrier offering substantial penetration resistance. (SER/PSP)
- The inspector verified that the licensee provides illumination sufficient to permit adequate assessment of unauthorized penetrations of or activities within the PA. (72.212(9), SER/PSP)

- The inspector verified that the licensee's perimeter of the PA allows for continual surveillance and is protected by an active intrusion alarm system that is capable of detecting penetrations through the isolation zone and that is monitored in a continually staffed primary alarm station and in one additional continually staffed location. (72.212(9), SER/PSP)
- The inspector verified that the primary alarm station is located within the PA, that it has bullet-resisting walls, doors, ceiling and floor; and the interior of the station is not be visible from outside the PA. A timely means for assessment of alarms is provided. The redundant alarm monitoring location provides a summary indication that an alarm has been generated. (SER/PSP)
- The inspector verified the licensee's PA is monitored by daily random patrols. (72.212(9), SER/PSP)
- The inspector verified that the licensee's security organization has written procedures that provide for sufficient personnel per shift to ensure the monitoring of detection systems and the conduct of surveillance, assessment, access control, and communications to assure adequate response. The inspector verified that members of the security organization are trained, equipped, qualified, and requalified to perform assigned job duties in accordance with the approved Training and Qualification Plan. (72.212(9), SER/PSP)
- The inspector verified that the licensee has documented liaison with a designated response force or local law enforcement agency (LLEA) to permit a timely response to unauthorized penetration or activities. (72.212(9), SER/PSP)
- The inspector verified that the licensee has a personnel identification system and a controlled lock system that limits access to only authorized individuals. (72.212(9), SER/PSP)
- The inspector verified that the licensee has redundant communications capability between onsite security force members and designated response force or LLEA. (72.212(9), SER/PSP)
- The inspector verified that all licensee individuals, vehicles, and hand-carried packages entering the PA must be checked for proper authorization and visually searched for explosives before entry. (72.212(9), SER/PSP)
- The inspector verified that the licensee's written response procedures have been established and maintained for addressing unauthorized penetration of or activities within, the PA. (72.212(9), SER/PSP)
- The inspector verified that all the licensee's detection systems and supporting subsystems include a tamper indicating system with line supervision. The system, as well as surveillance/assessment and illumination systems, must be maintained in operable condition. (72.212(b)(9))

- The inspector verified that the licensee protects safeguards information against unauthorized disclosure. (10 CFR 73.21, 10 CFR 73.22, and 10 CFR 73.23 and 10 CFR 72.212(b)(9)(vi))
- The inspector verified that the licensee's physical protection program is reviewed once every 24 months by individuals independent of both physical protection program management and personnel who have direct responsibility for implementation of the physical protection program. The physical protection program review must include an evaluation of the effectiveness of the physical protection system and a verification of the liaison established with the designated response force or LLEA. (72.212(9), SER/PSP)
- The inspector verified that the licensee has retained the following documentation as a record for three years after the record is made or until termination of the license. Any duplicate records required under 10 CFR 72.180 and 10 CFR 73.71 of this part need not be retained under the requirements of this section: a log of individuals granted access to the PA; screening records of members of the security organization; a log of all patrols; a record of each alarm received, identifying the type of alarm, location, date and time when received, and disposition of the alarm; and the physical protection program review reports. (72.212(9), SER/PSP)
- The inspector verified that, in accordance with any applicable security requirements and/or security orders, the licensee has implemented measure and process for vehicle control measures into protected areas. (72.212(9), SER/PSP)
- The inspector verified that, in accordance with any applicable security requirements and/or security orders, the licensee has implemented an insider mitigation program. (SER/PSP)
- The inspector verified that the licensee has developed offsite response coordination with LLEA as applicable to physical security requirements and/or security orders. (72.212(9), SER/PSP)

## **INSPECTION RESULTS**

No violations were identified.

## **EXIT MEETINGS AND DEBRIEFS**

The inspector verified no proprietary information was retained or documented in this report.

- On October 8, 2020, the inspector presented the security baseline inspection results to Mr. T. Uehling, Sr., Director Decommissioning, and other members of the licensee staff.



## DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
81311	Corrective Action Documents Resulting from Inspection	CR	2020-00567, 2020-00569, 2020-00570, 2020-00571	
	Miscellaneous	Lesson ID: 1108	Use of Force Continuum	3/31/20
		Lesson ID: 2106	Security Respirator Training, Escape Hood	3/13/20
		NRC Order EA-04-185	ISFSI Order For Interim Safeguards and Security Compensatory Measures	2004
		NRC Order EA-04-187	ISFSI Order For Implementation of Additional Security Measures Associated With Access Authorization	2004
		Plan	Physical Security Plan, Training Plan, Contingency Plan	Revision 0
		SER	NRC Security Evaluation Report; L-2019-LLA-0058 Docket No. 50-285 and 72-054	2019
	Procedures	6	OPPD Corporate Central Station Remote Monitoring Station - FCS ISFSI CAS	Version 1
		FCSI-SY-101	ISFSI Personnel Access Control	Revision 1
		FCSI-SY-102	ISFSI Vehicle Control	Revision 1
		FCSI-SY-103	Security Patrols	Revision 1
		FCSI-SY-110	Access Authorization Program	Revision 1
		FCSI-SY-112	Lock and Key Control	Revision 0
		FCSI-SY-116	ISFSI Communications	Revision 1
		FCSI-SY-117	Testing and Maintenance of Security Equipment	Revision 1
		FCSI-SY-200	Control/Classification of Safeguards Information ...	Revision 1
	Work Orders	PS GAT/VB/MOD PM4	Perform Monthly Maintenance	