



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

December 1, 2020

Mr. Rod Penfield
Site Vice President
Energy Harbor Nuclear Corp.
Perry Nuclear Power Plant
10 Center Road,
Perry, OH 44081

SUBJECT: PERRY NUCLEAR POWER PLANT – SECURITY BASELINE INSPECTION
REPORT 05000440/2020403

Dear Mr. Penfield:

On October 22, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Perry Nuclear Power Plant and discussed the results of this inspection with Mr. Frank Payne and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

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* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

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

Docket No. 05000440
License No. NPF-58

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Rod Penfield from Steven K. Orth dated December 1, 2020.

SUBJECT: PERRY NUCLEAR POWER PLANT – SECURITY BASELINE INSPECTION
REPORT 05000440/2020403

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

Docket Number: 05000440

License Number: NPF-58

Report Number: 05000440/2020403

Enterprise Identifier: I-2020-403-0032

Licensee: Energy Harbor Nuclear Corp.

Facility: Perry Nuclear Power Plant

Location: Perry, OH

Inspection Dates: October 5, 2020 to October 22, 2020

Inspectors: N. Egan, Senior Physical Security 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 Perry Nuclear Power Plant, 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.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." 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. Publicly available IPs are located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), regional inspectors were directed to begin telework. The inspection documented below was determined that the objectives and requirements stated in the IP could, in part, be performed remotely.

SAFEGUARDS

71130.02 - Access Control

The inspectors evaluated the access control program through completion of the following inspection elements:

Access Control (1 Sample)

- (1)
 - Tier I: All requirements
 - Tier II: 02.06 a-d, 02.07 a, 02.08 a-c
 - Tier III: 02.10 a

71130.05 - Protective Strategy Evaluation

The inspectors evaluated the licensee's protective strategy through completion of the following procedure elements:

Protective Strategy Evaluation (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.05 a, 02.06 a-l, 02.06 m-n, 02.07 a, 02.07 d-e
 - Tier III: 02.09 a-b, 02.10 a, 02.11 a

71130.09 - Security Plan Changes

The inspectors evaluated the security plan changes through completion of the following procedure elements:

Review Security Plan Changes (IP Section 02.01) (1 Sample)

- (1) Since the last NRC inspection of this program area, Security Plan Revision(s) 14 to 15 were implemented based on your determination, in accordance with Title 10 of

the *Code of Federal Regulations* (10 CFR), Part 50.54(p)(2), that the changes resulted in no decrease in safeguards effectiveness of the security plan, and that the revised security plan changed continues to meet the requirements of 10 CFR 73.55(b). The inspectors conducted a review of the security plan changes to evaluate for potential decrease in safeguards effectiveness of the security plan. However, this review does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On October 22, 2020, the inspectors presented the security baseline inspection results to Mr. Frank Payne and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Procedures	NOBP-LP-1003	Unescorted Access In-Processing	11
		NOBP-LP-1013	Safeguards Information Background Investigation	01
		NOP-LP-1001	Unescorted Access Requirements	20
		NOP-LP-1001	Unescorted Access Requirements	20
		NOP-LP-1102	Protection of Safeguards Information	07
		NOP-LP-1104	Security-Related Access Control Devices	05
		NOP-LP-1202	Vehicle and Material Access Control	10
		NOP-LP-1203	Security Badge Control	06
		NOP-LP-1204	Primary Access Controls	10
		NOP-LP-1205	Visitor Control to Protected and Vital Areas	06
	Self-Assessments	MS-C-18-10-19	Fleet Oversight Audit Report	0
SA-BN-2020-1939		Analysis of Security Access Control Program in Relation to NRC Inspection Criteria Outlined in Inspection Guide 71130.02	0	
71130.05	Calculations	EESFEN-1608-018; FEN003	Perry Nuclear Blast Security Calculation and Documentation Review	0
		SPS-0532 CALC50: 28.000	Design of VBS Penetration at Perry Nuclear Power Plant for DBT	11/06/2018
	Miscellaneous		Memorandum of Agreement Between Perry Nuclear Power Plant and Lake County Sheriff's Office	10/12/2019
			Perry Nuclear Power Plant Physical Security Plan	15
		FELP #ADV	Adversary Training	04
	Procedures	NOBP-LP-1114	Adversary Team Program	04
		NOBP-LP-1207	Security/Adversary Timeline Guidance	01
		NOP-LP-1003	Threat Reporting and Two Person Line of Sight Rule	05
		NOP-LP-1107	Safety and Security Interface	04
		NOP-LP-1402	Performance Evaluation Program	02
	SPI-0006	Security Patrol and Alarm response Instruction	60	
71130.09	Miscellaneous		Perry Nuclear Power Plant Physical Security Plan	14
			Select Security Drills & Exercise Packages from 2019-2020 Evaluating Protective Strategy Changes	01/01/2019 - 01/01/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		L-20-004	Perry Nuclear Power Plant Physical Security Plan Change 50.54 (p) Submittal Letter & Attachments	02/07/2020