



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

April 27, 2021

Mr. David P. Rhoades
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 – SECURITY
BASELINE INSPECTION REPORT 05000277/2021401 AND 05000278/2021401

Dear Mr. Rhoades:

On April 8, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Peach Bottom Atomic Power Station, Units 2 and 3 and discussed the results of this inspection with Mr. Matthew Herr, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report. Remote inspections were completed on April 2, 2021, and on-site inspections were completed on April 8, 2021.

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,

Fred L. Bower, III, Chief
Security, EP and Incident Response Branch
Division of Radiological Safety and Security

Docket Nos. 05000277 and 05000278
License Nos. DPR-44 and DPR-56

Enclosure:
As stated

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SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 – SECURITY
 BASELINE INSPECTION REPORT 05000277/2021401 AND 05000278/2021401
 DATED APRIL 27, 2021

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

Docket Numbers: 05000277 and 05000278

License Numbers: DPR-44 and DPR-56

Report Numbers: 05000277/2021401 and 05000278/2021401

Enterprise Identifier: I-2021-401-0066

Licensee: Exelon Generation Company, LLC

Facility: Peach Bottom Atomic Power Station, Units 2 and 3

Location: Delta, PA

Inspection Dates: March 29, 2021 to April 8, 2021

Inspectors: D. Caron, Senior Physical Security Inspector
K. Hussar, Senior Physical Security Inspector
S. McCarver, Physical Security Inspector

Approved By: Fred L. Bower, III, Chief
Security, EP and Incident Response Branch
Division of Radiological Safety and Security

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Peach Bottom Atomic Power Station, Units 2 and 3, 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

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection on March 29, 2021, unless otherwise noted. Additionally, remote inspections were completed on April 2, 2021, and on-site inspections were completed between April 2 and April 8, 2021. 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 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. 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), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

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: 9 Requirements (02.06 a - c, 02.07 a, 02.08 a - d, i)
 - Tier III: 1 Requirement (02.09)

71130.04 - Equipment Performance, Testing, and Maintenance

The inspectors evaluated the security equipment performance, testing, and maintenance program through completion of the following inspection elements:

Equipment Performance, Testing, and Maintenance (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 4 Requirements (02.09 a, b, 02.11 a, e)
 - Tier III: 3 Requirements (02.14, 02.15 a, b)

71130.07 - Security Training

The inspectors evaluated the security training program through completion of the following procedure elements:

Security Training (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 6 Requirements (02.05 a - d, 02.06 b, 02.09 a)
 - Tier III: 5 Requirements (02.11 a, 02.012 a - b, 02.13 a - b)

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) The opportunity to apply this procedure was not available in accordance with Inspection Manual Chapter 0306. This sample was not available because the licensee did not conduct the activity covered by this IP. Specifically, the licensee has not initiated a physical security plan change in accordance with 10 CFR 50.54(p)(2) since the last performance of this IP and PSP Revision 20 remains current.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicator submittals listed below:

PP01: Protected Area Security Equipment Performance Index Sample (IP Section 03.17) (1 Sample)

- (1) January 1, 2020 through December 31, 2020

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On April 8, 2021, the inspectors presented the security baseline inspection results to Mr. Matthew Herr, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
71130.02	Corrective Action Documents	04335350			
		04344488			
			04349815		
			04350001		
			04354109		
			04383709		
	Corrective Action Documents Resulting from Inspection	04414204			
		04414370			
	Procedures		04414826		
			04414965		
		SY-AA-101-112	Exelon Security Search Processes	Revision 37	
		SY-AA-101-112-1004	Protected Area Search Processes	Revision 4	
		SY-AA-101-112-F-06	PA Entry - Vehicle Search	Revision 9	
	SY-AA-101-120	Control of Security Access Control Devices	Revision 9		
	SY-PB-101-119	Control of Receiving Warehouse	Revision 43		
71130.04	Corrective Action Documents	04338190			
		04342056			
		04338445			
		04354559			
		04354586			
	Corrective Action Documents Resulting from Inspection	04414653			
		04414554			
	Procedures		04414546		
			SY-AA-101-122	Testing Security Equipment	Revision 22
			SY-AA-122-1001	Performance of Security System Tests	Revision 13
		SY-AA-150-103	Firearms Maintenance, Testing, and Accountability	Revision 2	
		SY-AA-500-127	Safety/Security Interface	Revision 7	
	SY-PB-101-122-1001	Performance of Security Systems Tests	Revision 98		
71130.07	Corrective Action	04333563			

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents	04336399 04349252 04365316 04365951 04367414 04371717 04379810		
	Miscellaneous		Peach Bottom Physical Security Plan, Appendix B	Revision 21
		CNVD-T	Thermal Rifle Qualification Course	Revision 1
		IQT 27D	Daylight Qualification Course for the AR-15 Rifle	Revision 4
		IQT 27N	Night Fire Rifle Qualification Course	Revision 2
		Lesson Plan 2105	Drill and Exercise Controller Training	Revision 12
		Lesson Plan 2108	Exelon Adversary Force Training	Revision 2
		Lesson Plan 2109	Insider Mitigation – Cyber Related Tampering	Revision 2
		ML20325A017	PEACH BOTTOM ATOMIC STATION, UNITS 2 AND 3 – EXEMPTION FROM ANNUAL FORCE-ON-FORCE EXERCISE REQUIREMENT OF 10 CFR PART 73, APPENDIX B, “GENERAL CRITERIA FOR SECURITY PERSONNEL,” SUBSECTION VI.C.3.(I)(1) (EPID L-2020-LLE-0192 [COVID-19])	Dated December 10, 2020
	RS-20-141	Request for an Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding 2020 Annual Force-on-Force (FOF) Exercises Due to COVID- 19 Public Health Emergency, Attachment 9	Dated November 13, 2020	
	Procedures	SY-AA-150	Nuclear Security Training Program5	Revision 5
		SY-AA-150-1007	Exelon Nuclear Security Adversary Force	Revision 2
		SY-AA-150-101	Exelon Nuclear Security Training	Revision 2
		SY-AA-150-102	Security Drills and Exercises	Revision 0
		SY-AA-150-104	Exelon Nuclear Security OJT Program	Revision 1
		SY-AA-150-105	Exelon Nuclear Security Physical Fitness Test Development, Approval and Conduct	Revision 1

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		SY-AA-150-105	Exelon Nuclear Security Physical Fitness Test Development, Approval and Conduct	Revision 1
		SY-AA-150-105-F-10	Peach Bottom Physical Fitness Test (PFT)	Revision 3
		SY-AA-152	Tactical Course Development, Approval and Conduct	Revision 7
71151	Procedures	SY-AA-101-155	Security Events and Nuclear Regulatory Commission Performance Indicators	Revision 10