



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

June 22, 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: NINE MILE POINT NUCLEAR STATION – SECURITY BASELINE INSPECTION
REPORT 05000220/2021402 AND 05000410/2021402

Dear Mr. Rhoades:

On June 3, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Nine Mile Point Nuclear Station and discussed the results of this inspection with Mr. Adam Schuerman, Plant Manager, 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,

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

Docket Nos. 05000220 and 05000410
License Nos. DPR-63 and NPF-69

Enclosure:
As stated

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SUBJECT: NINE MILE POINT NUCLEAR STATION – SECURITY BASELINE INSPECTION REPORT 05000220/2021402 AND 05000410/2021402 DATED JUNE 22, 2021

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

Docket Numbers: 05000220 and 05000410

License Numbers: DPR-63 and NPF-69

Report Numbers: 05000220/2021402 and 05000410/2021402

Enterprise Identifier: I-2021-402-0038

Licensee: Exelon Generation Company, LLC

Facility: Nine Mile Point Nuclear Station

Location: Lycoming, NY

Inspection Dates: May 24, 2021 to June 3, 2021

Inspectors: D. Caron, Senior Physical Security Inspector
S. McCarver, Physical Security Inspector
J. Rey, Physical Security Inspector
M. Ordoyne, Physical Security Inspector (Training)

Approved By: Fred L. Bower, III, Chief
Security, Emergency Preparedness 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 Nine Mile Point Nuclear Station, 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), 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.

In response to the COVID-19 Public Health Emergency declared on January 31, 2020, by the Secretary of the United States Department of Health and Human Services on the public health risks of the coronavirus, Nine Mile Point Nuclear Station pursued an exemption to security officer training and requalification requirements (ML20218A860). In addition to these exemptions, licensees implemented additional actions or alternatives allowed in response to health concerns within existing regulatory guidance available in RG 5.75 to ensure annual Force on Force exercises were conducted as safely as possible while maintaining the requirements to simulate as closely as practicable site specific conditions and minimizing the number and effects of artificialities associated with these exercises (Part 73, Appendix B, VI.C.3)

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: 12 Requirements (02.06 a - d, 02.07 a, 02.08 a, b, d, e, f, g, i)
 - Tier III: 1 Requirement (02.09)

71130.05 - Protective Strategy Evaluation

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

Protective Strategy Evaluation (2 Samples)

- (1)
 - Tier I: All Requirements
 - Tier II: 14 Requirements (02.05 a, 02.06 a, b, d - m, 02.07 a)
 - Tier III: 4 Requirements (02.08, 02.09 a, 02.10 a, 02.11 a)
- (2)
 - The inspectors evaluated the Security Performance Evaluation Program.

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 (PSP) change in accordance with Title 10 of the *Code of Federal Regulations* 10 CFR 50.54(p)(2) since the last performance of this IP and PSP Revision 13 remains current.

71130.14 - Review of Power Reactor Target Sets

The inspectors evaluated the Security Target Set Program. The following elements were evaluated:

Review of Power Reactor Target Sets (1 Sample)

- (1) 02.02 (a-d, f), 02.03, 02.04 (a-b), 02.05

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

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

- (1) January 1, 2020 through April 30, 2021

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On June 3, 2021, the inspectors presented the security baseline inspection results to Mr. Adam Schuerman, Plant Manager, 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 04412779 AR04410091 AR 04380683 AR 04379886 AR 04371532		
	Corrective Action Documents Resulting from Inspection	AR 04425399 IR 04426957		
	Procedures	SY-AA-101-106	Control and Classification of Safeguards Information (SGI) and Sensitive Unclassified Non-Safeguards Information (SUNSI)	Revision 21
		SY-AA-101-112-1004	Protected Area Search Processes	Revision 4
		SY-AA-101-120	Control of Security Access Control Devices	Revision 9
		SY-NM-101-115-1001	Nine Mile Point Gate Controls	Revision 4
	71130.05	Calculations	Calc No. CNSNM069-002	Cooling Tower Culverts - Increase in Delay Time
Calc No. NMP-7717012-S01			Nine Mile Point Security Building West Analysis	Revision 1
Calc No. NMP-7717012-S02			Nine Mile Point Blast Analysis Update	Revision 1
Calc No. NMP-KC-S00			Nine Mile Point Nuclear Facility - NMP Blast Analysis Summary and Diagram	Revision 0
Calc No. NMP-KC-S01			Nine Mile Point Nuclear Facility - NMP Unit 1 Minimum Safe Standoff Distance Analysis	Revision 0
Miscellaneous		NOSA-NMP-20-02	Security Program Audit Report	February 6, 2020
		NOSA-NMP-21-01	Security Program Audit Report	February 10, 2021
Procedures		NS-843A	NMP Adversary and Responder Timelines	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		SY-AA-150-1007	Exelon Nuclear Security Adversary Force	Revision 2
		SY-AA-150-102	Security Drills and Exercises	Revision 0
		SY-NM-101-501	NMP Security Defensive Strategy	Revision 9
71130.14	Corrective Action Documents	AR 04165141 AR 04248972 AR 04369501		
	Procedures	SY-AA-500-127	Safety/Security Interface	Revision 7
		SY-NM-101-116-1001	Nine Mile Point Patrols and Surveillances	Revision 9
		SY-NM-101-502	NMP Security Target Set Procedure	Revision 0