



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

July 2, 2021

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

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT – SECURITY BASELINE
INSPECTION REPORT 05000244/2021401

Dear Mr. Rhoades:

On June 24, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at R. E. Ginna Nuclear Power Plant and discussed the results of this inspection with Mr. Daren Blankenship, 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
and Incident Response Branch
Division of Radiological Safety and Security

Docket No. 05000244
License No. DPR-18

Enclosure:
As stated

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SUBJECT: R. E. GINNA NUCLEAR POWER PLANT – SECURITY BASELINE
INSPECTION REPORT 05000244/2021401 DATED JULY 2, 2021

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

Docket Number: 05000244

License Number: DPR-18

Report Number: 05000244/2021401

Enterprise Identifier: I-2021-401-0077

Licensee: Exelon Generation Company, LLC

Facility: R. E. Ginna Nuclear Power Plant

Location: Ontario, NY

Inspection Dates: June 21, 2021 to June 24, 2021

Inspectors: K. Hussar, Senior Physical Security Inspector
D. Caron, Senior Physical Security Inspector
S. McCarver, Physical Security Inspector
J. Rey, Physical Security Inspector
M. Ordoyne, Physical Security Inspector (Training)
T. Eck, 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 R. E. Ginna 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), 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, R. E. Ginna Nuclear Power Plant pursued an exemption to security officer training and requalification requirements (ML20330A291). 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: 14 Requirements (02.06 a - d, 02.07 a, 02.08 a - 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 inspection elements:

Protective Strategy Evaluation (2 Samples)

- (1)
 - Tier I: All Requirements
 - Tier II: 18 Requirements (02.05 a, 02.06 a, d, e - n, 02.07 a- e)
 - 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 inspection 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 12 remains current.

71130.14 - Review of Power Reactor Target Sets

The inspectors evaluated the security target set program through completion of the following inspection elements:

Review of Power Reactor Target Sets (1 Sample)

- (1) 02.01, 02.02 a - e, 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) April 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 24, 2021, the inspectors presented the security baseline inspection results to Mr. Daren Blankenship, 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	4358311		
		4382405		
		4386032		
		4387156		
		4392014		
		4401267		
		4411176		
		4417193		
		4421897		
	4426006			
	Corrective Action Documents Resulting from Inspection	4430840		
		4430846		
		4431006		
Procedures	SY-AA-101-106	Control and Classification of Safeguards Information (SGI) and Sensitive Unclassified Non-Safeguards Information (SUNSI)	Revision 22	
	SY-AA-101-112	Exelon Security Search Processes	Revision 37	
	SY-AA-101-112-1004	Protected Area Search Processes	Revision 4	
	SY-AA-101-112-1005	Owner Controlled Area Inspection Processes	Revision 2	
	SY-AA-101-112-F-06	PA Entry – Vehicle Search	Revision 9	
	SY-AA-101-117	Processing and Escorting of Personnel and Vehicles	Revision 32	
	SY-AA-101-120	Control of Security Access Control Devices	Revision 9	
	SY-AA-101-132	Security Assessment and Response to Unusual Activities	Revision 34	
	SY-GI-101-119	Ginna OCA Warehouse Search Activities	Revision 008	
	SY-GI-101-119-F-01	Material Search Officer Checklist	Revision 007	
SY-GI-101-119-F-02	Vehicle Escort Officer Checklist	Revision 002		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.05	Calculations	CALC No. 2013-S-017	LLEA Resource Response Times and Agreements	02/05/2021
		CALC No. DA-CE-16-003	Ginna Security Composite Blast Analysis 2016	Revision 0
		CALC No. DA-CE-16-004	Ginna Security Active Vehicle Barrier Analysis 2016	Revision 0
		DOC. REF. # 2014-S-007	Analysis of Underground Pathways Intersecting PA Boundaries	01/17/2014
	Corrective Action Documents Resulting from Inspection	4431294 4431214		
	Procedures	SY-GI-101-501	Station Security Defensive Strategy Procedure	Revision 12
71130.14	Corrective Action Documents	4401267		
	Procedures	ER-SEC.2	Response to Intrusion by Adversary	Revision 00702.01
		O-2.3.1	Draining and Operation at Reduced Inventory of the Reactor Coolant System	Revision 092
		SY-AA-500-127	Safety/Security Interface	Revision 007
		SY-GI-101-502-1001	Target Set Identification Process	Revision 0
71151	Miscellaneous		Monthly Performance Indicator Data	