



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

August 9, 2021

Mr. David Rhoades
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION – SECURITY BASELINE
INSPECTION REPORT 05000237/2021404 AND 05000249/2021404

Dear Mr. Rhoades:

On June 29, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Dresden Nuclear Power Station and discussed the results of this inspection with Ms. Laurie Antos 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,

A handwritten signature in black ink, appearing to read "S. Orth".

Signed by Orth, Steven
on 08/09/21

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

Docket Nos. 05000237 and 05000249
License Nos. DPR-19 and DPR-25

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to David Rhoades from Steven K. Orth dated August 9, 2021.

SUBJECT: DRESDEN NUCLEAR POWER STATION – SECURITY BASELINE
INSPECTION REPORT 05000237/2021404 AND 05000249/2021404

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

Docket Numbers: 05000237 and 05000249

License Numbers: DPR-19 and DPR-25

Report Numbers: 05000237/2021404 and 05000249/2021404

Enterprise Identifier: I-2021-404-0011

Licensee: Exelon Nuclear

Facility: Dresden Nuclear Power Station

Location: Morris, Illinois

Inspection Dates: March 15, 2021 to June 29, 2021

Inspectors: A. Anderson, Physical Security Inspector
J. Gilliam, Senior Reactor 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 Dresden Nuclear Power 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.

SAFEGUARDS

71130.02 - Access Control

The inspectors evaluated the access control program. The completion of these elements, combined with the completion of elements documented in report 05000237/2021402 and 05000249/2021402 , dated March 16, 2021, constitute one complete sample.

Access Control (1 Sample)

- (1)
 - Tier I: 02.02 a - f; 02.04 a
 - Tier II: 02.06 d; 02.08 g
 - Tier III: 02.10

71130.04 - Equipment Performance, Testing, and Maintenance

The inspectors evaluated the security equipment testing and maintenance program. The following elements were evaluated from this IP

Equipment Performance, Testing, and Maintenance (1 Sample)

- (1)
 - Tier I: All
 - Tier II: 02.09 a - b; 02.11 a - b; 02.13
 - Tier III: 02.14; 02.15 a

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
 - Tier II: 02.05 a - c; 02.06 a - b; 02.07 a; 02.08 a; 02.09 a - b
 - Tier III: 02.10; 02.11 a; 02.12 a - b; 02.13 a, c

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 29, 2021, the inspectors presented the security baseline inspection results to Ms. Laurie Antos and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.04	Miscellaneous		Dresden Security Armorer Certification Letters (4 Armorers)	02/26/2020 - 02/26/2023
			Active Vehicle Barrier System Testing Logs: Monthly Checks	06/05/2021 - 06/17/2021
			Zone Doors and Turnstile Weekly Testing (EWS, warehouse, badging, PAF turnstiles, cameras, zones): 100 Alarm Records	06/14/2021 - 06/17/2021
			Security Equipment Preventive Maintenance, Intrusion Detection Equipment Logs: 15280, 118470, 176238, 8551, 186236, 8406, 11808, 11847, 15280, 185269, 8543, 189183, 182302, 184840	06/21/2021
		10 CFR 73.58; CC-AA-103-F-05, Revision 2; package #627863	Security Video Capture (Dreambox) Equipment Replacement; Dresden Station Engineering Change Package; work order #04945053; 1000 pages	11/04/2019
		SY-AA-101-103-F-01; IR 04407598	Active Vehicle Barrier System (AVBS) Inspection Program Checklist: Walkdown, VBS Cracking	2
		SY-AA-101-122-1001-F-03; Revision 001	Lighting Test Log	05/01/2021 - 06/01/2021
		SY-AA-1037-F-01; Revision 0	Avon PC50 Protective Respirator Inspection Logs	Respirator IDs: 0770, 0811, 0818, 0888
		SY-AA-150-103-F-17, Revision 0	Contingency Equipment Inventory Log	01/31/2021; 02/12/2021; 04/30/2021; 05/22/2021
		TC-1131-USP-VMS	Video Bank Callup Camera System Testing: TC - 92 individual test documents	07/29/19
	Procedures	SY-AA-101-122	Testing Security Equipment	023
	SY-AA-101-122	Operation of The Security Control Centers	015	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
		SY-AA-101-122-101	Performance of PID Camera System Tests	000	
		SY-AA-101-122-101-F-04	Biometrics Threshold Verification Method	000	
		SY-AA-101-122-102	Performance of EW Detection System Tests	000	
		SY-AA-101-122-103	Performance of Access Control Device and Portal Tests	000	
		SY-AA-101-122-104	Special Purpose Detector, Communication, Lighting and Biometrics Threshold Test	000	
		SY-AA-150-103	Firearms Maintenance, Testing and Accountability	002	
		SY-AA-150-103-F-07	Barrel Evaluation Criteria	000	
		SY-AA-150-103-F-09	Auxilliary-Miles Ammunition, Documentation, Inspection, Storage and Inventory	000	
	Self-Assessments	NOSA-DRE-21-01	Security Programs Audit Report: AR 4394279	01/19/2021 - 03/05/2021	
		PI-AA-126-1001-F; AR 04411461	Self-Assessment: Security Equipment Testing and Maintenance	004	
		SY-AA-150-103-F-01; Revision 0	Record of Semi-annual Functionality and Accuracy Tests and Firearms and Maintenance and Repair (duty, training and inert): 100 records reviewed	000	
	71130.07	Corrective Action Documents		Safeguards Event Reports	02/01/2021 through 02/15/2021
			Miscellaneous		National Rifle Association (NRA) Instructors Certification Cards
		National Rifle Association (NRA) Courses of Fire Approval Letters: Exelon Daylight, Night Fire and Thermal Rifle Qualification;		002	
		Security Written Examinations (A, B, C)		03/17/2021	
		Dresden Security Annual Examinations and Nuclear Regulatory Commission Order Examination Matrix		03/15/2021	
08374		Officers Qualification Matrix (Department)		03/15/2021	
Individual		Perform Critical Administrative Items (1-28)	007		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		Qualification Test		
		Individual Qualification Test	Personnel Protective Equipment	006
		Lesson Plans	Security Training - Program of Instruction (Security Officer) #2000	01/05/2018
		Lesson Plans	Security Training - Program of Instruction (Security Force Supervisor) #3000	06/11/2019
		Lesson Plans - 4000	Weapons Training Qualification	010
		SY-AA-150-101-F-13	Individual Security Training File Cover Sheet	009
		SY-AA-150-101-F-29; Lesson Plans - 4101 - LP-R11	Weapons Safety and Fundamentals	000
	Procedures	HR-AA-07-110	Armed Member of Security Organization (MSO) Medical Examination Record	017
		SY-AA-101-145	Security Standards of Conduct	015
		SY-AA-101-145	Security Standards of Conduct	015
		SY-AA-150-1001-F-29	LP-RS-1108, Escalations: Use of Force Continuum	000; 09/16/2017
		SY-AA-150-1001-F-29	Insider Mitigation: Cyber Related Tampering	000
		SY-AA-150-1008	Firearms Training Simulator	001
		SY-AA-150-101	Exelon Nuclear Security Training Standards	002
		SY-AA-150-101-F-01	Watchperson - Individual Qualification Record	002
		SY-AA-150-101-F-02	Armed Responder Individual Qualification Record	003
		SY-AA-150-101-F-03	Alarm Station Operator	002
		SY-AA-150-101-F-04	Response Team Leader	003
		SY-AA-150-101-	List of Regulatory Required Security Training - Dresden Station	001

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		F-14	3 Year Security Training Plan (Signed)	
		SY-AA-150-101-F-44; 4401 - OBIG - R9	Security Document Based Instructor Guide: Weapons Training Qualification Guide: Courses of Fire	000
		SY-AA-150-101-F-47	Security Instructor Continuing Training	002
		SY-AA-150-101-F-48	LP-R3-4109 - Weapons Familiarization Training	000
		SY-AA-150-102-F-16	Tactical Response Drill Report	001
		SY-AA-150-102-F-16	Tactical Response Drill	001
		SY-AA-150-103-F-05	Firearms, Cleaning and Lubrication Guide (1)	000
		SY-AA-150-103-F-09	Auxilliary-Miles Ammunition Documentation, Inspection, Storage and Inventory Log	000
		SY-AA-150-103-F-12	Duty Firearm and Equipment Inspection Matrix	000
		SY-AA-150-104	Exelon Nuclear Security On-The-Job-Training Program	001
		SY-AA-150-105-F-06	Dresden Physical Fitness Test	003
	Self-Assessments	AR 04372539	Self-Assessment for Nuclear Regulatory Inspection 71130.07, security training	12/21/2020