



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

August 23, 2021

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

SUBJECT: CLINTON POWER STATION – SECURITY BASELINE INSPECTION REPORT
05000461/2021402

Dear Mr. Rhoades:

On August 6, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Clinton Power Station and discussed the results of this inspection with Ms. N. Plumey, 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,

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

Signed by Orth, Steven
on 08/23/21

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

Docket No. 05000461
License No. NPF-62

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to David Rhoades from Steven K. Orth dated August 23, 2021.

SUBJECT: CLINTON POWER STATION – SECURITY BASELINE INSPECTION REPORT
05000461/2021402

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

Docket Number: 05000461

License Number: NPF-62

Report Number: 05000461/2021402

Enterprise Identifier: I-2021-402-0064

Licensee: Exelon Generation Company, LLC

Facility: Clinton Power Station

Location: Clinton, IL

Inspection Dates: August 02, 2021 to August 06, 2021

Inspectors: J. Kutlesa, Physical Security Inspector
A. Woyansky, Security Specialist

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 Clinton 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>.

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

71130.05 - Protective Strategy Evaluation

On January 31, 2020, the Secretary of the United States Department of Health and Human Services declared a Public Health Emergency (PHE) on the public health risks of the COVID-19 coronavirus. In response to the PHE, Clinton Power Station pursued an exemption to security officer training and requalification requirements (ML20323A434 for specific exemptions approved). In addition to these exemptions, licensees implemented additional actions or alternatives in response to health concerns. As described in existing regulatory guidance (e.g., Regulatory Guide 5.75), licensees implemented measures 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).

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: All requirements
 - Tier III: 02.09; 02.10; 02.11
- (2) Observed annual Force-on-Force conducted on 08/03/2021.

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 19 to 20 was implemented based on your determination, in accordance with 10 CFR 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 August 6, 2021, the inspectors presented the security baseline inspection results to Ms. N. Plumey, Plant Manager and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.05	Calculations	CC-AA-309-1001	Design Analysis Minor Revision	1
		CC-AA-309-1001	Design of Passive VBS	0
	Corrective Action Documents Resulting from Inspection	AR 04438519	71130.05 NRC Day One Observations	08/02/2021
		AR 04439093	71130.05 NRC Day Four Observations	08/05/2021
	Miscellaneous		Force on Force Drill Folders	2018 - 2020
		Security Aid 16	Security Power System Configuration	0
		Security Aid 17	Subterranean Penetration Pictures	3
		SY-AA-101-133-F-01	Supporting Law Enforcement Agency Response Capability	01/19/2021
	Procedures	SY-AA-150-1006-F-01	Responder Timeline Worksheet	2
		SY-AA-500-127	Safety/Security Interface	7
SY-CL-101-501		Site Specific Defensive Strategy	9	
71130.09	Miscellaneous		Clinton Power Station Security Plan	19
			Clinton Power Station Security Plan	20