



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

September 28, 2021

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

SUBJECT: BYRON STATION – SECURITY BASELINE INSPECTION REPORT
05000454/2021402 AND 05000455/2021402

Dear Mr. Rhoades:

On August 20, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Byron Station and discussed the results of this inspection with Mr. Curt Catencamp, Security 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 09/28/21

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

Docket Nos. 05000454 and 05000455
License Nos. NPF-37 and NPF-66

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to David Rhoades from Steven K. Orth dated September 28, 2021.

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05000454/2021402 AND 05000455/2021402

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

Docket Numbers: 05000454 and 05000455

License Numbers: NPF-37 and NPF-66

Report Numbers: 05000454/2021402 and 05000455/2021402

Enterprise Identifier: I-2021-402-0065

Licensee: Exelon Generation Company, LLC

Facility: Byron Station

Location: Byron, IL

Inspection Dates: August 16, 2021 to August 20, 2021

Inspectors: A. Anderson, Physical Security Inspector
J. Gilliam, Senior Reactor 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 Byron 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

71130.05 - 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, Byron Power Station pursued an exemption to security officer training and requalification requirements (ML20213C177 and ML20323A393 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: 02.05 a; 02.06 a, d, e, f, h, j, l, m, n; 02.07 a, b, c, d
 - Tier III: 02.08; 02.09 a, b; 02.11 a
- (2) Observed annual Force-on-Force drill conducted on 08/19/2021.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On August 20, 2021, the inspectors presented the security baseline inspection results to Mr. Curt Catencamp, Security Manager and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
71130.05	Corrective Action Documents	04427531	Security Conducted Annual Force on Force Exercises		
		04427533	Security Conducted Annual Force on Force Exercises		
		04427534	Security Conducted Annual Force on Force Exercises		
		04427536	Security Conducted Annual Force on Force Exercises		
		4416138	Security-PIDS Zones	04/13/2021	
		4426916	Security-Individuals on Company Property	06/01/2021	
		4428671	Security-Officer Scheduled Training Adjusted	06/10/2021	
	Miscellaneous			Byron Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program	17
		04390584		Security COVID19 Exemption for 2020 Annual Force-On-Force Exercises	01/15/2021
		Local Law Enforcement Agency Memorandum		Supporting Law Enforcement Agency Response Capability - Ogle County Sheriff Office	5
		SY-BY-101-501		Byron Supplemental Safeguards Contingency Response Plan	5
		SY-BY-101-502		Byron Station Target Sets	4
	Procedures	LS-AA-119		Fatigue Management and Work Hour Limits	
		SY-AA-101-104		Control and Distribution of Security Plans and Implementing Procedures	23
		SY-AA-101-116		Conducting Patrols	17
		SY-AA-101-132		Security Assessment and Response to Unusual Activities	34
		SY-AA-1022		Miles Equipment Usage	9
		SY-AA-150-1006		Timelines	003
		SY-AA-150-1007		Exelon Nuclear Security Adversary Force	1
		SY-AA-150-101		Exelon Nuclear Training	2
		SY-AA-150-101-F-48		Security Presentation Based Lesson Plan Cover	0
		SY-AA-150-102		Security Drills and Exercises	0
		SY-BY-101-502		Byron Target Sets	5

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Self-Assessments	AR 4394288	Audit NOSA-BYR-21-01; Byron Station	01/19/2021 - 02/03/2021
		PL-AA-126-1001-F-01; AR04290121	Self-Assessment - Protective Strategy, Pre-NRC, 71130.05	002; 02/13/2020