



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

October 12, 2021

Mr. John Dent, Jr., Vice President
and Chief Nuclear Officer
Nebraska Public Power District
72676 648A Avenue, P.O. Box 98
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION – SECURITY BASELINE INSPECTION
REPORT 05000298/2021402

Dear Mr. Dent:

On September 23, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Cooper Nuclear Station and discussed the results of this inspection with you 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 cursive script that reads "Ray Kellar".

Signed by Kellar, Ray
on 10/12/21

Ray L. Kellar, P.E., Chief
Plant Support Branch 1
Division of Reactor Safety

Docket No. 05000298
License No. DPR-46

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

COOPER NUCLEAR STATION – SECURITY BASELINE INSPECTION
 REPORT 05000298/2021402 – DATED OCTOBER 12, 2021

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 By: RLK Yes No Publicly Available Sensitive NRC-002

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DATE	10/6/2021	10/6/2021	10/7/2021	10/12/2021	10/12/2021

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

Docket Number: 05000298

License Number: DPR-46

Report Number: 05000298/2021402

Enterprise Identifier: I-2021-402-0005

Licensee: Nebraska Public Power District

Facility: Cooper Nuclear Station

Location: Brownville, NE

Inspection Dates: September 20, 2021 to September 23, 2021

Inspectors: J. Buchanan, Physical Security Inspector
J. Rollins, Senior Physical Security Inspector

Approved By: Ray L. Kellar, P.E., Chief
Plant Support Branch 1
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 Cooper 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.

SAFEGUARDS

71130.01 - Access Authorization

The inspectors evaluated the access authorization program through completion of the following inspection elements:

Access Authorization (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: All Requirements
 - Tier III: All Requirements except 01.02.10b

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: All Requirements
 - Tier III: All Requirements

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 Partial)

(1) (Partial)

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. Specially, the licensee has not initiated a physical security plan change in accordance with Title 10 of the *Code of Federal Regulations*, Part 50.54(p)(2) since the last performance of this IP, and the Physical Security Plan dated January 8, 2019, remains current.

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 02.17)
(1 Sample)

(1) September 1, 2020, through August 31, 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 September 23, 2021, the inspectors presented the security baseline inspection results to Mr. John Dent, Jr. and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.01	Corrective Action Documents		CNS-2019-02883, CNS-2019-04442, CNS-2019-05330, CNS-2020-03-938, CNS-2020-04191, CNS-2021-01873, and CNS-2021-02018.	
	Miscellaneous		Qualification Records for Access Authorization Staff	09/29/2020
			Qualification Records for Access Authorization Staff	09/18/2020
			Reviewing Official Designation Memorandum	09/30/2019
			Sample of Access Authorization Records	
			Sample of Badge Status Forms	
			CNS Blocked Badge List	06/30/2021
			Sample of Fitness for Duty Drug and Alcohol Testing Records	
		O-SS-JPM-AA-1.0	Job Performance Measure Badge Issuance and Control	0
		O-SS-JPM-AA-2.0	Job Performance Measure Personnel in Processing	0
		O-SS-JPM-AA-3.0	Job Performance Measure Granting Unescorted Access	0
		O-SS-JPM-AA-4.0	Job Performance Measure Behavioral Observation Program	0
		O-SS-JPM-AA-5.0	Job Performance Measure Computer Interface	0
		Procedures	0-CNS-13	Personnel Access Data System
	0-FFD-01		NPG Fitness for Duty Program and Behavioral Observation Program	42
	3.0		Access Authorization	20
	3.2		Fair Credit Reporting Act	12
	3.3		Re-investigation and Psychological Re-assessment	7
	3.4		CNS Photo Badge Management	8
	3.5		Adjudication Matrix Procedure	3
71130.02	Corrective Action Documents		CR-CNS-2020-03923, CR-CNS-2020-04433, CR-CNS-2020-05808, CR-CNS-2021-00100, CR-CNS-2021-02322, CR-CNS-2021-04486, CR-CNS-2021-04487, CR-CNS-2021-	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			04488, CR-CNS-2021-04499	
	Miscellaneous		Security Event Log	08/10/2019 - 09/17/2021
	Procedures	1.2	Protection of Unclassified Safeguards Information	48
		2.10	Local Law Enforcement Agency (LLEA)	17
		2.14	Compensatory Measures	56
		2.5	Personnel Access Control	58
		2.6	Vehicle Entry/Exit	65
		2.7	Material Entry/Exit	46
		2.8	Access Control Devices	59
		3.14	Non-Security Emergencies	22
		3.15	Emergency Entry/Exit	15
		3.4	CNS Photo Badge Management	8