



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

October 14, 2021

Mr. Terry Brown
Site Vice President
Energy Harbor Nuclear Corp.
Davis-Besse Nuclear Power Station
5501 N. State Rte. 2, Mail Stop A-DB-3080
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION – SECURITY BASELINE
INSPECTION REPORT 05000346/2021403

Dear Mr. Brown:

On September 16, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Davis-Besse Nuclear Power Station and discussed the results of this inspection with Mr. J. Pry, Site Performance Improvement Director, 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 10/14/21

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

Docket No. 05000346
License No. NPF-3

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Terry Brown from Steven K. Orth dated October 14, 2021.

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INSPECTION REPORT 05000346/2021403

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

Docket Number: 05000346

License Number: NPF-3

Report Number: 05000346/2021403

Enterprise Identifier: I-2021-403-0019

Licensee: Energy Harbor Nuclear Corp.

Facility: Davis-Besse Nuclear Power Station

Location: Oak Harbor, OH

Inspection Dates: August 23, 2021 to September 16, 2021

Inspectors: R. Cassara, Resident Inspector
N. Egan, Senior Physical Security 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 Davis-Besse 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

71130.05 - 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, Davis-Besse Nuclear Power Station pursued an exemption to security officer training and requalification requirements (ML20345A205 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-i, 02.06 m-n, 02.07 a, 02.07 d-e
 - Tier III: 02.09 a-b, 02.10 a, 02.11 a
- (2)
 - Observed annual Force-on-Force exercises conducted on 08/25/2021.

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 16, 2021, the inspectors presented the security baseline inspection results to Mr. J. Pry, Site Performance Improvement Director, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.05	Corrective Action Documents	CR-2020-06552	COVID-19 PHE Training Exemption Tracking	08/20/2020
	Miscellaneous		Davis-Besse Nuclear Power Station Protective Strategy Manual	22
			Physical Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, for the Davis-Besse Nuclear Power Station	24
			Davis-Besse Nuclear Power Station Law Enforcement Response Plan	03
	Procedures	NOBP-LP-1112	Training, Drills, and Exercise Risk Management	01
		NOBP-LP-1114	Adversary Team Program	04
		NOBP-LP-1122	Preparing for a Triennial Force-On-Force (FOF) Evaluation	02
		NOP-LP-1401	Security Training Program	10
		NOP-LP-1402	Performance Evaluation Program	02
	Self-Assessments	ATL-2020-0888-ATA-20	2021 Security Protective Strategy Evaluation	08/06/2021