



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

November 17, 2021

Mr. Joel P. Gebbie
Senior VP and Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR PLANT – SECURITY BASELINE INSPECTION
REPORT 05000315/2021403 AND 05000316/2021403

Dear Mr. Gebbie:

On October 13, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Donald C. Cook Nuclear Plant 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 black ink, appearing to read "S. Orth".

Signed by Orth, Steven
on 11/17/21

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

Docket Nos. 05000315 and 05000316
License Nos. DPR-58 and DPR-74

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Joel P. Gebbie from Steven K. Orth dated November 17, 2021.

SUBJECT: DONALD C. COOK NUCLEAR PLANT – SECURITY BASELINE INSPECTION
REPORT 05000315/2021403 AND 05000316/2021403

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

Docket Numbers: 05000315 and 05000316

License Numbers: DPR-58 and DPR-74

Report Numbers: 05000315/2021403 and 05000316/2021403

Enterprise Identifier: I-2021-403-0031

Licensee: Indiana Michigan Power Company

Facility: Donald C. Cook Nuclear Plant

Location: Bridgman, MI

Inspection Dates: July 19, 2021 to October 13, 2021

Inspectors: J. Mancuso, Resident Inspector
M. Ziolkowski, 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 Donald C. Cook Nuclear Plant, 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 procedure elements:

Access Authorization (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.05a; 02.06 a-b
 - Tier III: 02.11a

71130.02 - Access Control

The inspectors evaluated the access control program through completion of the following procedure elements:

Access Control (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.06 a, d
 - Tier III: 02.10 a

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, Donald C. Cook Nuclear Plant pursued an exemption to

security officer training and requalification requirements (ML20324A003 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. The completion of these elements, combined with the completion of elements documented in report 05000315/2021402 and 05000316/2021402, dated June 9, 2021, constitute two complete samples including the observation of an annual FOF exercise on March 11, 2021.

Protective Strategy Evaluation (2 Samples)

- (1) Protective Strategy Evaluation
 - Tier I: 02.01 a-c, e-j; 02.02 a-f; 02.03 a
 - Tier II: 02.06 d-e, h, k-m
 - Tier III: None

- (2) Performance Evaluation Program
 - Tier I: 02.04 a, d-e
 - Tier II: 02.07 c
 - Tier III: None

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 Requirements
 - Tier II: 02.05 a - d
 - Tier III: 02.13 a - b

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 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.

71130.14 - Review of Power Reactor Target Sets

The inspectors evaluated the security target set program through completion of the following procedure elements:

Review of Power Reactor Target Sets (1 Sample)

- (1) Requirements: 02.02 a-e; 02.03; 02.04 a-b

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) Unit 1 (January 01, 2020 through June 30, 2021)
Unit 2 (January 01, 2020 through June 30, 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 October 13, 2021, the inspectors presented the security baseline inspection results to Joel P. Gebbie and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.01	Miscellaneous	NANTeL	Generic Fitness-For-Duty and Behavioral Observation Content Document	06/01/2021
		NE-2020-29	Supplier Audit Report for Confidential Services INC.	06/23/2020
	Procedures	SPP-2060-SFI-420	Access Authorization Program Elements	18
		PMP-2060-ACS-002	Access Authorization Program	28
		PMP-2060-ACS-003	In-Processing / Out-Processing	18
		SPP-2060-SFI-422	Unescorted Access Denial Appeal Process	7
		SPP-2060-SFI-423	Review Criteria for Unescorted Access Authorization	13
		SPP-2060-SFI-424	Employee Identification - Issuance and Control of Keycards	10
71130.02	Procedures	SPP_2060-SFI-209	Protected Area Access/Exit Requirements	27
		SPP_2060-SFI-214	Security Core, Key and Lock Program	27
		SPP_2060-SFI-308	Tests of Security Related Equipment	59
71130.05	Calculations	1601075	Minimum Safe Standoff Distance for the Large and Small NRC Design Basis Explosive Threats	07/10/2021
	Corrective Action Documents	AR-2021-5001	SAC Self-Assessment Condition	06/01/2021
		Engineering Evaluations	Calc 2998626-C-005 RO	Engineering Evaluation of Delay Barrier Steel Post Overturning
			SL-014566	Evaluation of Revised Vehicle Barrier System Layout
	Miscellaneous	SE-C-AR048	Controller Training	4
		SE-O-RRTT01	Adversary Task Performance Evaluation Card	3
	Procedures	SPP-2060-SFI-201	Armed Response Actions, Firearms, and Strategy	36

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		SPP-2060-SFI-205	Central and Secondary Alarm Station (CAS/SAS)	22
		SPP-2060-SFI-205-1	Alarm Dispatch and Response	4
		SPP-2060-SFI-206	Security Patrols	38
		SPP-2060-SFI-302	Compensatory Measures	25
		SPP_2060-1-SFI-302	Compensatory Measures Risk Assessment	0
		SPP_2060-SFI-202	Security Safeguards Contingency Actions	9
		SPP_2060-SFI-213	Integrated Response Procedure	4
		SPP_2060-SFI-216	Plant Response to a Security Event	33
		SPP_2060-SFI-219	Responding to a UAV/UAS in the OCA and PA	0
		Self-Assessments	2020-0505-1	Protective Strategy Evaluation and Performance Evaluation Program
71130.07	Miscellaneous		Donald C. Cook Tactical Course	1
			NRA Approval of Tactical Qualification Course	03/12/2020
			NRA Duty Rifle/Thermal Site Qualification Course Approval	02/26/2020
		SE-C-AR023	Patrol Responsibilities Lesson plan	4
	SE-C-AR028	Deadly Force Lesson Plan	3	
	Procedures	SE-Q-FOF01-1	Force-on-Force 40 hr. Qualification Card	0
		SPP_2060-SFI-505	Force-on-Force Training	19
		SPP_2060-SFI-511	Gas Masks	9
TPD-600-SEC		Security Training Program Description	13	
71130.09	Miscellaneous		Donald C. Cook Nuclear Plant Security Plan	20
			NEI 11-08 Security Plan Change Evaluation, Security Plan Revision 20	01/04/2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.14	Calculations	PRA-STUDY-030	DC Cook Nuclear Plant PRA Study	02/01/2007
		SD-061206-001	Flooding Evaluation Report for DC Cook Nuclear Plant	3
		WCAP-16141	RCP Seal Leakage PRA Model	08/01/2003
	Procedures	SPP_2060-SFI-507	Target Set Development	4
	Self-Assessments	GT 2021-0892-1	Self-Assessment Review of Reactor Target Sets	07/22/2021
71151	Procedures	PMP-7110-PIP-001	Reactor Oversight Program Performance Indicator and Monthly Operating Report Data	2