



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

December 14, 2021

Mr. Ross Gold
Director Power Operations
Sacramento Municipal Utility District
4401 Bradshaw Rd.
Sacramento, CA 75827-3834

SUBJECT: RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION –
NRC SECURITY INSPECTION REPORT 07200011/2021401

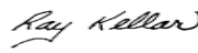
Dear Mr. Gold:

On November 17, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Rancho Seco. On November 17, 2021, the NRC inspectors 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,

 Signed by Kellar, Ray
on 12/14/21

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

Docket No.: 07200011

Enclosure:
Inspection Report 07200011/2021401

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RANCHO SECO INDEPENDENT SPENT FUEL STORAGE INSTALLATION – NRC SECURITY INSPECTION REPORT 07200011/2021401 DATED – DECEMBER 14, 2021

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ADAMS ACCESSION NUMBER: ML21347A962

<input checked="" type="checkbox"/> SUNSI Review By: RLK	ADAMS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Sensitive <input checked="" type="checkbox"/> Non-Sensitive	<input type="checkbox"/> Non-Publicly Available <input checked="" type="checkbox"/> Publicly Available	Keyword NRC-002
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DATE	12/14/2021	12/14/2021	12/14/21	12/14/21

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

Docket Number: 07200011

License Number: SNM-2510

Report Number: 07200011/2021401

Enterprise Identifier: I-2021-401-0150

Licensee: Sacramento Municipal Utility District

Facility: Rancho Seco Independent Spent Fuel Storage Installation

Location: Harold, CA

Inspection Dates: November 16, 2021 to November 17, 2021

Inspector: A. Meyen, Physical Security Inspector

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

Enclosure

SUMMARY

This report covers a two-day period of an announced routine baseline inspection on security conducted by one physical security inspector from the NRC's Region IV office. There were no findings identified during this inspection.

This inspection consisted of a review and evaluation of the physical security program for the independent spent fuel storage installation at the Rancho Seco Independent Spent Fuel Storage Installation. The inspection consisted of observations of the independent spent fuel storage installation physical security related activities, interviews with personnel, and an examination of procedures and security records. The inspector used Inspection Procedure (IP) 81311 "Physical Security Requirements for Independent Spent Fuel Storage Installations" to conduct the inspection.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

REPORT DETAILS

IP 81311 Physical Security Requirements for Independent Spent Fuel Storage Installations (ISFSI)

Inspection Scope

81311 - Physical Security Requirements for Independent Spent Fuel Storage Installations

02.02 Review of Specific License Requirements

- a. The inspector verified that spent nuclear fuel (SNF) and power reactor-related greater than class C waste is stored only within a protected area (PA) required by 10 CFR 73.51(b)(2)(i) and (10 CFR 73.51(d)(1).
- b. The inspector verified that only individuals who are authorized to enter the PA are granted access to the PA required by 10 CFR 73.51(b)(2)(ii).
- c. The inspector verified that the licensee is in compliance with site specific security orders (e.g., additional security measures) for access authorization and fingerprinting; also, that a log of authorized individuals is required pursuant to 10 CFR 73.51(d)(13)(i).
- d. The inspector verified the licensee can detect and assess penetrations through the isolation zone required by 10 CFR 73.51(d)(3).
- e. The inspector verified the licensee can provide timely communication to the designated response force whenever necessary required by 10 CFR 73.51(b)(2)(iv).
- f. The inspector verified that the physical protection system is designed to protect against loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose as described in 10 CFR 72.106(b) and 10 CFR 73.51(b)(3).
- g. The inspector verified that the licensee has retained a copy of the physical protection plan for a period of 3 years or until termination of the license required by 10 CFR 73.51(c).
- h. The inspector verified that the licensee complies with the provisions for physical protection systems, components, and procedures that meet the performance objectives of 10 CFR 73.51(b)(1), 10 CFR 73.51(b)(2), and 10 CFR 73.51(d).
- i. The inspector verified the licensee provides illumination sufficient to permit adequate assessment of unauthorized penetrations of or activities within the PA required by 10 CFR 73.51(d)(2).
- j. The inspector verified the licensee's perimeter of the PA allows for continual surveillance and is protected by an active intrusion alarm system that is capable of detecting penetrations through the isolation zone; and that it is monitored in a continually staffed primary alarm station and in one additional continually staffed location required by 10 CFR 73.51(d)(3).
- k. The inspector verified that the primary alarm station is located within the PA; that it has bullet-resisting walls, doors, ceiling and floor; that the interior of the station is not visible from outside the PA; that a timely means for assessment of alarms is provided regarding

alarm monitoring; and that the redundant location provided a summary indication that an alarm has been generated required by 10 CFR 73.51(d)(3).

l. The inspector verified the licensee's PA is monitored by daily random patrols pursuant to 10 CFR 73.51(d)(4); and a log of all patrols is required in accordance with 10 CFR 73.51(d)(13)(iii).

m. The inspector verified the licensee's security organization has written procedures that provides for sufficient personnel per shift to ensure the monitoring of detection systems and the conduct of surveillance, assessment, access control, and communications to assure adequate response; that members of the security organization are trained, equipped, qualified, and requalified to perform assigned job duties in accordance with Appendix B to Part 73, sections I.A, (1)(a) and (b), B(1)(a), and the applicable portions of section II pursuant to 10 CFR 73.51(d)(5).

n. The inspector verified the licensee has a documented liaison with a designated response force or local law enforcement agency (LLEA) to permit a timely response to unauthorized penetration or activities required by 10 CFR 73.51(d)(6).

o. The inspector verified the licensee has a personnel identification system and a controlled lock system that limits access to only authorized individuals required by 10 CFR 73.51(d)(7).

p. The inspector verified the licensee has redundant communications capability between onsite security force members and designated response force or LLEA required by 10 CFR 73.51(d)(8).

q. The inspector verified that all individuals, vehicles, and hand-carried packages entering the PA are checked for proper authorization and visually searched for explosives before entry in accordance with 10 CFR 73.51(d)(9).

r. The inspector verified the licensee's written response procedures have been established and maintained for addressing unauthorized penetration of, or activities within, the PA required by 10 CFR 73.51(d)(10).

s. The inspector verified that all the licensee's detection systems and supporting subsystems include a tamper indicating system with line supervision; that the system, as well as surveillance/assessment and illumination systems, is maintained in an operable condition required by 10 CFR 73.51(d)(11).

t. The inspector verified the licensee protects safeguards information against unauthorized disclosure required by (10 CFR 73.21 and 10 CFR 73.22).

u. The inspector verified the licensee's physical protection program is reviewed once every 24 months by individuals independent of both physical protection program management and personnel who have direct responsibility for implementation of the physical protection program; that the physical protection program review includes an evaluation of the effectiveness of the physical protection system and a verification of the liaison established with the designated response force or LLEA pursuant to 10 CFR 73.51(d)(12).5

v. The inspector verified the licensee has retained the following documentation as a record for 3 years after the record is made or until termination of the license: a log of individuals granted access to the PA; screening records of members of the security organization; a log of all patrols; a record of each alarm received, identifying the type of alarm, location, date, and time when received, and disposition of the alarm; and the physical protection program review reports pursuant to 10 CFR 73.51(d)(13)(i)(ii)(iii)(iv) and (v).

w. The inspector verified in accordance with any applicable security requirements and/or security orders that the licensee has implemented measures and processes for vehicle control measures into protected areas.

x. The inspector verified in accordance with any applicable security requirements and/or security orders, that the licensee has implemented an insider mitigation program.

y. The inspector verified that the licensee has developed offsite response coordination with LLEA as applicable to physical security requirements and/or security orders.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On November 17, 2021, the inspectors presented the security baseline inspection results to Ross Gold and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
81311	Corrective Action Documents	PDQ-18-050	Unattended Access Door	
	Miscellaneous	PAIDS Test	Annual ISFISI Microwave Security System Test	06/22/2021
		PAIDS Test	Annual Non-Microwave Security System Test	06/23/2021
		PPP	Physical Protection Plan, Amendment 8	12/18/2017
		T&Q	Training and Qualification Plan	7
	Procedures	RSAP-1003	ISFISI Access Screening Requirements	18
		RSIP-203	Protected Area Access Control	0
		RSIP-204	Security Records Maintenance	0
		RSIP-205	Security Equipment Operational Testing	0
		RSIP-206	Communications	0
		RSIP-207	Patrol Officer and Primary Alarm Station Operator Duties	0
		RSIP-208	Weapons and Equipment Safety and Issuance	0
		RSIP-209	Compensatory Measures	0
		RSIP-211	Conduct of Operations	0
		RSIP-731	Review of 31 Day Unescorted Access Authorization	0
	RSNAP-0201	Protection of Safeguards Information	1	
Self-Assessments	20-A-001B	Audit Checklist	06/29/2020	