



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

May 25, 2022

Mr. Kelly Trice
President, HDI
Holtec Decommissioning International, LLC
Krishna P. Singh Technology Campus
1 Holtec Boulevard
Camden, NJ 08104

**SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT NUCLEAR
GENERATING STATION UNITS 1, 2, AND 3 - NRC SECURITY DECOMMISSIONING
INSPECTION REPORT NOS. 05000003/2022401, 05000247/2022401, AND
05000286/2022401**

Dear Mr. Trice:

On May 5, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the permanently shut down Indian Point Nuclear Generating Station Units 1, 2, and 3. On-site inspection was performed on April 25 – May 5, 2022. The inspection examined activities conducted under your licenses as they relate to security and compliance with the Nuclear Regulatory Commission's (NRC) rules and regulations and with the conditions of your licenses. The inspectors reviewed select procedures and records, observed activities, interviewed site personnel, and performed site walk-downs. The NRC inspectors discussed the results of this inspection with Mr. Richard Burrone, Site Vice President, and other members of your staff on May 5, 2022. The results of this inspection are documented in the enclosed report.

Based on the results of the inspection, no violations of more than minor significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if any, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

No reply to this letter is required. Please contact Dana Caron at 610-337-5140 if you have any questions regarding this matter.

Sincerely,

Daniel Schroeder, Chief
Security, Emergency Preparedness and Incident
Response Branch
Division of Radiological Safety and Security

Docket Nos: 50-003, 50-247, 50-286
License Nos: DPR-5, DPR-26, DPR-64

Enclosure:
Inspection Report Nos.: 05000003/2022401,
05000247/2022401, 05000286/2022401

Cc w/encl: Distribution via LISTSERV®

cc w/encl:
D. Gagnon, Holtec Fleet Security Director
J. Swart, Security Manager IPEC
Jean Fleming, Vice President Regulatory & Environmental Affairs, HDI
Alyse Peterson, Senior Advisor, New York State
Energy Research and Development Authority

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT NUCLEAR GENERATING STATION UNITS 1, 2, AND 3 - NRC SECURITY DECOMMISSIONING INSPECTION REPORT NOS. 05000003/2022401, 05000247/2022401, AND 05000286/2022401 DATED MAY 25, 2022

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ADAMS ACCESSION NUMBER: ML22145A553

Entire Report: XSUNSI Review		X Non-Sensitive Sensitive			X Publicly Available Non-Publicly Available	
Cover Letter Only: XSUNSI Review		X Non-Sensitive <input type="checkbox"/> Sensitive			X Publicly Available <input type="checkbox"/> Non-Publicly Available	
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*concurrence via email

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I
INSPECTION REPORT

Docket Nos. 05000003, 05000247, and 05000286

License Nos. DPR-5, DPR-26, and DPR-64

Report Nos. 05000003/2022401, 05000247/2022401, and 05000286/2022401

Enterprise Identifier: I-2022-401-0049

Licensee: Holtec Decommissioning International, LLC (HDI)

Facility: Indian Point Energy Center, Units 1, 2, and 3

Location: Buchanan, NY.

Inspection Dates: April 25 – May 5, 2022

Inspectors: Dana Caron, Senior Physical Security Inspector
Sammy McCarver, Physical Security Inspector
Mike Ordoyne, Physical Security Inspector

Approved by: Daniel Schroeder, Chief
Security, Emergency Preparedness and Incident Response
Branch
Division of Reactor Safety and Security

EXECUTIVE SUMMARY

Holtec Decommissioning International, LLC (HDI)
Indian Point Nuclear Generating Station Units 1, 2, and 3
NRC Inspection Report Nos. 05000003/2022401,
05000247/2022401, and 05000286/2022401

This report covers an announced security decommissioning program core inspection of the physical protection program at the Indian Point Nuclear Generating Station – Units 1, 2, and 3 performed April 25 – May 5, 2021. The objective of the inspection was to determine if activities involving the physical protection program, associated with the samples inspected, provide assurance that the licensee's program is designed and implemented in a manner that protects against the design basis threat (DBT) of radiological sabotage. The U.S. Nuclear Regulatory Commission's (NRC's) oversight of the security of a shut down nuclear power reactor is described in Inspection Procedure (IP) 81200, "Security." Additionally, for reactors that have permanently shut down and entered decommissioning, violations of regulatory requirements are evaluated using the traditional enforcement process described in the NRC's Enforcement Policy. Under traditional enforcement, violations of more than minor significance are assigned a severity level (SL) ranging from I (most significant) to IV (least significant).

Based on the results of this inspection, no violations of safety significance were identified.

REPORT DETAILS

Inspection Scope

Inspection activities were conducted using the appropriate portions of the IPs in effect at the beginning of the inspection unless otherwise noted. At the time of this inspection, approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2202 Appendix A, "Security Core Inspection Program." 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.

1. Protective Strategy for Decommissioning Nuclear Power Reactors, IP 81200.05

a. Inspection Scope

The inspectors evaluated the access control program through completion of a minimum of 50% of the inspection requirements.

Protective Strategy and Performance Evaluation Program for Decommissioning Nuclear Power Reactors (1 Sample)

02.01 a - o, 02.02 a - d, f - h, j, k, n - v, 02.03, 02.04 a - k, 02.05

b. Observations and Findings

The inspectors conducted walkdowns of defensive positions, target sets, timelines, protected area and vital area barriers, vehicle barrier systems, and alarm stations. The inspectors reviewed protective strategy procedures, barrier specifications, blast analyses, performance evaluation drill and exercise documentation, and ballistic specifications. The inspectors observed a licensee annual Force on Force exercise and reviewed their critique report.

The Indian Point Energy Center Protective Strategy and Performance Evaluation Program was in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

c. Conclusions

No violations of more than minor significance were identified.

2. Security Plan Changes for Decommissioning Nuclear Power Reactors, IP 81200.09

a. Inspection Scope

The inspectors evaluated the security plan changes through completion of the following inspection elements:

Security Plan Changes (1 Sample)

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. Specifically, the licensee has not initiated a physical security plan change in accordance with 10 CFR 50.54(p)(2) since the last performance of this IP and PSP Revision 26 remains current.

b. Observations and Findings

None

c. Conclusions

No violations of more than minor significance were identified.

3. Review of Decommissioning Reactor Target Sets, IP 81200.14

a. Inspection Scope

The inspectors evaluated the decommissioning reactor target sets through completion of a minimum of seven of the inspection requirements.

Decommissioning Reactor Target Sets (1 Sample)

02.01, 02.02 a, b, e, 02.03, 02.04 a, 02.05

b. Observations and Findings

The inspectors reviewed the licensee procedure for the identification and development of target sets and changes made to their target sets since the last inspection. Additionally, inspectors selected one target set and performed a detailed review to verify the target set was complete and accurate. This included a review of supporting analyses.

The Indian Point Energy Center process to identify, document and maintain the site's target sets has been kept up to date in accordance with requirements. Additionally, the target sets are complete and accurate and have been used to inform the site's protective strategy to protect against the DBT of radiological sabotage.

c. Conclusions

No violations of more than minor significance were identified.

Exit Meeting Summary

On May 5, 2022, the inspectors presented the inspection results to Mr. Richard Burroni, Site Vice President, and other members of the licensee's staff. The inspectors verified that no proprietary information was retained by the inspectors or documented in this report.

ATTACHMENT

(U) SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

R. Burroni, Site Vice President
D. Gagnon, Holtec Fleet Security Director
J. Swart, IPEC Security Manager

LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

None

INSPECTION PROCEDURES USED

IP 81200.05, Protective Strategy for Decommissioning Nuclear Power Reactors
IP 81200.09, Security Plan Changes for Decommissioning Power Reactors
IP 81200.14, Review of Decommissioning Reactor Target Sets

LIST OF DOCUMENTS REVIEWED

Procedures

EN-NS-306, Development and Maintenance of Target Sets, Revision 5
O-SE-007, Insider Mitigation Program, Revision 6
O-SE-015, Security Patrols, Revision 9
LLEA MOU, 01/28/2022
EN-NS-215, Conduct of Security Force Exercise & Drill, Revision 21
EN-NS-215-02, Annual Force on Force Exercise, Revision 0
EN-NS-216, Controller Responsibilities Guideline, Revision 12
EN-NS-215-01, Tactical Response Drills, Revision 0
EN-NS-220 Managing the Safety and Security Interface, Revision 5

Miscellaneous

IPEC Critical Target Sets
2021 Target Set Review
2022 Target Set Review
MOU LLEA, NYS Police, 1/24/22
CALC. NO. ENTGIP138-CALC-001, Revision 2

Condition Reports

CR-IP2-00276

CR-IP2-00244

CR-IP2-00238

CR-IP3-00545

CR-IP3-00553

CR-IP3-00563

CR-IP3-00562

Condition Reports Generated

CR-IP3-00551

CR-IP3-00547

CR-IP3-00554

CR-IP3-00553