



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD, SUITE 102  
KING OF PRUSSIA, PA 19406-1415

October 5, 2023

Docket No. 07200059  
License No. DPR-28

Billy Reid, Jr.  
NorthStar Vice President  
Vermont Yankee Nuclear Power Station  
320 Governor Hunt Rd.  
Vernon, VT 05354

**SUBJECT: VERMONT YANKEE - INDEPENDENT SPENT FUEL STORAGE  
INSTALLATION SECURITY INSPECTION REPORT 07200059/2023401**

Dear Billy Reid:

On September 14, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed an Independent Spent Fuel Storage Installation (ISFSI) security inspection at the Vermont Yankee, Independent Spent Fuel Storage Installation in Vernon, VT. The inspection covered the licensee's physical security plan and the October 16, 2002, Interim Compensatory Measures for Dry Independent Spent Fuel Storage Installations Order and was conducted using NRC Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations."

The enclosed inspection report documents the inspection results, which were discussed with you and other members of your staff, on September 14, 2023.

The inspection examined activities conducted under your license as they relate to security and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

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

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter and enclosure will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's

B. Reid

2

Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

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

Enclosure:  
Inspection Report No. 07200059/2023401

cc w/encl:  
J. Patrick, Security Manager (Vermont Yankee)  
ListServ

SUBJECT: VERMONT YANKEE – INDEPENDENT SPENT FUEL STORAGE  
 INSTALLATION SECURITY INSPECTION REPORT 07200059/2023401 DATED  
 OCTOBER 5, 2023

Distribution w/encl: (via E-mail)

RLorson, RA (R1ORAMAIL RESOURCE)  
 DCollins, DRA (R1ORAMAIL RESOURCE)  
 PKrohn, DRSS (R1DRSSMAIL RESOURCE)  
 JQuichocho, DRSS (R1DRSSMAIL RESOURCE)  
 ADimitriadis, DRSS  
 DScrenci, PAO  
 NSheehan, PAO  
 DTiftt, SLO  
 JClark, NSIR (Physical Security IRs)  
 JWorosilo, DRS, RII (Physical Security IRs)  
 SOrth DRSS, RIII (Physical Security IRs)  
 RKellar, DRS, RIV (Physical Security IRs)  
 SOSB Insp Rpt Distro (SOSBInspRptDistro@usnrc.onmicrosoft.com)

**File:** <https://usnrc.sharepoint.com/teams/RIDRSPSBSEC/Shared Documents/Inspection Reports/2023 IR Draft/3 Yankees/Vermont Yankee ISFSI IR 2023 Public.docx>

ADAMS ACCESSION NUMBER: ML23264A081 (Cover letter w/enclosure) **(Publicly Available)**

Cover Letter w/Enclosure <input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRSS	RI/DRSS	RI/DRSS	RI/DRSS	RI/DRSS
NAME	DCaron	SMcCarver	ADimitriadis	DSchroeder	
DATE	09/25/2023	09/27/2023	10/05/2023	10/05/2023	

\*concur via e-mail

**OFFICIAL RECORD COPY**

**U.S. NUCLEAR REGULATORY COMMISSION  
REGION I  
INSPECTION REPORT**

Docket No. 07200059

License No. DPR-28

Report No. 07200059/2023401

Licensee: Northstar Nuclear Decommissioning Company, LLC (Northstar NDC)

Address: 320 Governor Hunt Rd.  
Vernon, VT 05354

Location Inspected: Vermont Yankee, Independent Spent Fuel Storage Installation (ISFSI)

Inspection Dates: September 13 - 14, 2023

Inspectors: Dana Caron, Senior Physical Security Inspector  
Sammy McCarver, Physical Security Inspector  
Chad Davis, Physical Security Inspector (Training)  
Joel Edwards, Physical Security Inspector (Training)

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

Enclosure

## REPORT DETAILS

### a. Inspection Scope

Inspection activities were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently 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) 2690, "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations." 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. The inspections documented below met the objectives and requirements for completion of the IP.

The inspectors evaluated this area by reviewing the Independent Spent Fuel Storage Installation (ISFSI) security plan, implementing procedures, and records; conducting interviews with responsible security personnel and plant employees; and performing walk-downs of the ISFSI.

The inspectors: (1) reviewed the access authorization program for the ISFSI; (2) verified and assessed the licensee's testing and maintenance program to assure the functionality and reliability of security equipment; and (3) verified that a rapid, capable response to safeguards contingency events had been appropriately developed and effectively implemented.

The inspectors conducted the following specific inspection activities and evaluated the program to determine if: (a) the access authorization program provided reasonable assurance that individuals granted unescorted access to the ISFSI Protected Area (PA) were trustworthy and reliable and did not constitute an unreasonable risk to public health and safety; (b) procedures were in place to ensure that vehicles accessing the ISFSI PA had proper authorization and were properly searched; (c) keys, locks, combinations, and associated hardware used in the ISFSI PA were properly controlled; (d) the intrusion detection system (IDS) had the ability to detect and assess unauthorized penetration of the ISFSI PA and adequate response capability existed; (e) alarms for the ISFSI IDS annunciated at a continually staffed alarm station; (f) the ISFSI PA was illuminated to facilitate adequate assessment of PA penetration or unauthorized activity; (g) a program was in place for testing and maintenance of the physical protection systems associated with the ISFSI; (h) the spent fuel storage was within a PA and was protected by two barriers; (i) the vehicle barrier system satisfied the design vehicle bomb attack requirements; (j) communications had been established between onsite security forces and a designated response force or local law enforcement agency (LLEA); (k) a security organization with written procedures had been established; (l) members of the security organization were trained, equipped, qualified, and requalified to perform assigned duties; (m) the committed responders provided for an adequate armed response; (n) written response procedures were established and maintained; (o) training included ISFSI activities; (p) safeguards events were being properly reported; (q) audits of the physical protection system were conducted; (r) signs were posted in accordance with requirements; (s) the licensee established an emergency plan; (t) the response force or

LLEA had unimpeded access to the ISFSI PA during contingency events; and (u) staffing, procedures, and resources were adequate to protect against radiological sabotage.

b. Findings and Observations

No findings were identified.

The inspectors reviewed approximately seven condition reports, self and independent assessments, training records, access authorization records, weekly testing records, daily patrol records, and intrusion alarm system performance testing records.

c. Conclusions

No violations of greater than minor security significance were identified.

Exit Meeting Summary

On September 14, 2023, the inspectors presented the inspection results to Billy Reid Jr., NorthStar 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  
SUPPLEMENTAL INFORMATION  
KEY POINTS OF CONTACT**

Licensee Personnel

B. Reid, Site Vice President, NorthStar  
S. Kelly, Holtec Security International Project Manager  
A. Stosz, Holtec Security International Security Operations Supervisor

**LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED**

Opened

None

Opened and Closed

None

Closed

None

**INSPECTION PROCEDURES USED**

IP 81311, Physical Security Requirements for Independent Spent Fuel Storage Installations

**LIST OF DOCUMENTS REVIEWED**

Procedures

Vermont Yankee ISFSI PSP, Revision 0  
Vermont Yankee ISFSI Defensive Strategy, Revision 0  
VY-SP-4, Issue, Control and Inventory of Security Keys, Revision 3  
VY-SP-7, ISFSI Access Control, Revision 6  
VY-SP-8, Security Force Training and Qualification, Revision 1  
VY-SP-13, Operational Inspection and Testing of Security Equipment, Revision 7  
VY-SP-16, Unescorted Access Authorization Program, Revision 4  
VY-SP-28, Weapons Maintenance Accountability Program, Revision 1  
VY-SP-36, Protection of Unclassified Safeguards Information, Revision 0

Condition Reports Reviewed

2020000206  
2020000207  
2021000027  
2021000105  
2021000116  
2022000218  
2023000018

Miscellaneous Documents

Vermont Yankee ISFSI Operations Audit VY-IM-21-016