



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

December 27, 2023

David Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION – SECURITY BASELINE INSPECTION REPORT
05000461/2023402

Dear David P. Rhoades:

On November 16, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Clinton Power Station and discussed the results of this inspection with Norha Plumey Site Vice President 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 dark ink, appearing to read "Michael E. Ziolkowski".

Signed by Ziolkowski, Michael
on 12/27/23

Michael E. Ziolkowski, Chief
Security, Emergency Preparedness, and Incident
Response Branch
Division of Radiological Safety and Security

Docket No. 05000461
License No. NPF-62

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to David P. Rhoades from Michael E. Ziolkowski dated December 27,2023.

SUBJECT: CLINTON POWER STATION – SECURITY BASELINE INSPECTION REPORT
05000461/2023402

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 05000461

License Number: NPF-62

Report Number: 05000461/2023402

Enterprise Identifier: I-2023-402-0039

Licensee: Constellation Nuclear

Facility: Clinton Power Station

Location: Clinton, IL

Inspection Dates: January 23, 2023 to November 30, 2023

Inspectors: A. Anderson, Physical Security Inspector
G. Bonano, Physical Security Inspector
J. Kutlesa, Emergency Preparedness Inspector
K. Maloney, Physical Security Inspector

Approved By: Michael E. Ziolkowski, Chief
Security, Emergency Preparedness, and Incident
Response Branch
Division of Radiological Safety and Security

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Clinton 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

Inspections 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) 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.

SAFEGUARDS

71130.02 - Access Control

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

Access Control (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.06 a, c; 02.07 a; 02.08 b, d, e, g, i
 - Tier III: 02.09

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 b - d; 02.06 a; 02.08 a; 02.09 a
 - Tier III: 02.10 c; 02.11 a; 02.12 a; 02.13 a; c

71130.08 - Fitness For Duty Program

The inspectors evaluated the fitness for duty program through completion of the following inspection elements:

Fitness For Duty Program (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.05 a - l; 02.06 a - g; 02.07; 02.08; 02.09 a - e
 - Tier III: 02.11; 02.12 a - e

71130.09 - Security Plan Changes

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

Security Plan Changes (1 Partial)

- (1) (Partial)
The opportunity to apply this procedure was not available in accordance with IMC 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.

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) September 1, 2022 through October 13, 2023

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 16, 2023, the inspectors presented the security baseline inspection results to Norha Plumey Site Vice President and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Miscellaneous	SY-AA-101-106	Control and Classification of Safeguards Information (SGI) and Sensitive Unclassified Non-Safeguards Information (SUNSI)	23
		SY-AA-101-112	Exelon Security Search Processes	38
		SY-AA-101-112-1004	Protected Area Search Processes	5
		SY-AA-101-117	Processing and Escorting of Personnel and Vehicles	34
		SY-AA-101-120	Control of Security Access Control Devices	10
		SY-AA-101-132	Security Assessment and Response to Unusual Activities - SUNSI	36
		SY-AA-101-132-F-02	Two Person Line of Sight Implementation for Security and ERO	3
		SY-AA-101-132-F-03	Two Person Line of Sight Implementation for Plant Personnel	3
		SY-AA-101-155-F-01	Safeguards Event Report (Reportable and 24-Hour Loggable Events)	4
		SY-AA-101-155-F-03	Environmental Log - Zone	4
		SY-CL-101-112	Clinton Protected Area Vehicle Searches	5
		SY-CL-101-500-F-15	Protected Area and Vital Area Entrance and Exit Log	0
71130.07	Miscellaneous	N-AN-SY-LP 4301X	Exam Version A, Book 1, AR/RTL/SSS	
		SY-AA-150	Nuclear Security Training Program	5
		SY-AA-150-1009	Firearms Practice Range Management	1
		SY-AA-150-101	Exelon Nuclear Security Training	3
		SY-AA-150-101-F-02	AR Individual Qualification Record	3
		SY-AA-150-101-F-04	Response Team Leader Individual Qualification Record	3
		SY-AA-150-101-F-26	Required Personal Corrective Aids Checklist	0

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		SY-AA-150-102	Security Drills and Exercises	0
		SY-AA-150-103	Firearms Maintenance, Testing and Accountability	2
		SY-AA-150-104	Constellation Nuclear Security OJT Program	2
		SY-AA-150-105	Physical Fitness Test Development, Approval & Conduct	1
		SY-AA-152	Tactical Course Development, Approval & Conduct	7
71130.08	Miscellaneous	SY-AA-102	Exelon Generation Fitness for Duty Program	Rev 2 Dated 03/02/2021
		SY-AA-102-1001	Constellation Station OCA Fitness for Duty Program	Rev 5 dated 07/22/2022
		SY-AA-102-1001-F-01	Nuclear Station OCA Drug and Alcohol Program	Rev 0 Dated 07/22/2022
		SY-AA-102-201-F-03	Fitness for Duty (FFD) Questionnaire	Rev 0 Dated 06/30/2021
		SY-AA-102-202	Testing for Cause	Rev 21 Dated 06/17/2021
		SY-AA-102-204	Random Selection and Notification Process	Rev 14 Dated 10/01/2021
71130.09	Miscellaneous		Clinton Nuclear Power Station Physical Security, Training and Qualification and Safeguards Contingency Plans	Rev 21 Dated 08/16/2021