



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

July 23, 2024

Brent Ridge
President and Chief Executive Officer
Dairyland Power Cooperative
S4601 State Road 35
Genoa, WI 54632

SUBJECT: LA CROSSE BOILING WATER REACTOR INDEPENDENT SPENT FUEL
STORAGE INSTALLATION – NRC SECURITY INSPECTION REPORT
07200046/2024401

Dear Brent Ridge:

On June 27, 2024, the U.S. Nuclear Regulatory Commission (NRC) completed a security inspection at the La Crosse Boiling Water Reactor (LACBWR) Independent Spent Fuel Storage Installation (ISFSI) and discussed the results of this inspection with Marty Moe, ISFSI Manager 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 07/23/24

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

Docket No. 07200046

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to B. Ridge from M.Ziolkowski dated July 23, 2024

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DATE	07/23/2024	07/23/2024			

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 07200046

License Number: General License

Report Number: 07200046/2024401

Enterprise Identifier: I-2024-401-0080

Licensee: Dairyland Power Cooperative

Facility: LACBWR ISFSI

Location: Genoa, WI

Inspection Dates: June 25, 2024 to June 27, 2024

Inspectors: G. Bonano, Physical Security Inspector
D. Garner, Security Specialist (Nuclear)

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 inspection of the Physical Protection Program for the Independent Spent Fuel Storage Installation (ISFSI), in accordance with the Spent Fuel Storage Oversight Process. The Spent Fuel Storage Oversight Process is the NRC's program for overseeing the safe storage of spent nuclear fuel. Refer to <https://www.nrc.gov/waste/spent-fuel-storage/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

Inspection was conducted using the appropriate portions of the Inspection Procedure (IP) 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations" 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

<https://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

The procedure was 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 and for Title 10 of the *Code of Federal Regulations*, Part 71 Transportation Packaging's."

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.

ISFSI SECURITY

81311 - Physical Security Requirements for Independent Spent Fuel Storage Installations

The inspectors evaluated the ISFSI Security Program. The following elements were evaluated:

Physical Security Requirements for Independent Spent Fuel Storage Installations (1 Sample)

- (1) 02.01 (a - c); 02.02 (a - h); 02.03 (a - m); 02.04; 02.05 (a - t); 02.06; 02.07 (a, b); 02.08 (a-c)

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On June 27, 2024, the inspectors presented the independent spent fuel storage installation security inspection results to Marty Moe, ISFSI Manager and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
81311	Miscellaneous		Individual Qualification record (IQR) – Armed Security Officer	06/17/2024
			Individual Qualification record (IQR) – Armed Security Officer	01/03/2024
			Individual Qualification record (IQR) – Security Shift Supervisor	01/11/2024
			Weekly Security System Tests	2022 - 2024
			Annual ISFSI Security Check	05/01/2024 - 05/23/2024
			Dairyland Power Cooperative La Crosse Boiling Water Reactor Independent Spent Fuel Storage Installation – LACBWR ISFSI PSP June 2024 – Addendum II, Training/Qualification Plan	
			Corrective Action Report (CAR) #2022-007 Security Audit Deficiency	
			Dairyland Power Cooperative La Crosse Boiling Water Reactor Independent Spent Fuel Storage Installation (ISFSI) Safeguards Information Program (April 2024)	15
			County of Vernon Sheriff's Office – Letter of Assistance in the Event of Emergency at LACBWR ISFSI	09/07/23
			Individual Qualification Record (IQR) – Security Shift Supervisor	01/11/2024
			Individual Qualification Record (IQR) – Armed Security Officer	01/03/2024
			Individual Qualification Record (IQR) – Armed Security Officer	06/17/24
			Recordable Physical Security Safeguards Events Log	02/15/24 - 04/03/24
		ACP–20.05.04	Security Maintenance Request (SMR) #48-24-03	
		Audit Report #2023-001	ISFSI Security Audit	
		Audit Report #2024-001	ISFSI Security Audit	

81311	Miscellaneous	CAR# 2022-019	NRC Audit Inspection Observations Report 22-401	
		CAR# 2023-004	2022 SMR Trend Analysis Report	
		CAR# 2023-010	Inappropriate Delay in Actions for a Security Impairment (Apparent Cause and Evaluation).	
		CAR# 2024-002	Security Audit – Opportunities for Improvement.	
		EA-09-118, Order for Implementation of ASMs and Fingerprinting for Unescorted Access to La Crosse Boiling Water Reactor ISFSI	ASMs for the Physical Protection of Dry ISFSI, 09/28/2007; ASMs for AA and Fingerprinting at ISFSI, 12/12/2007	
		LACBWR ISFSI Physical Security Plan (PSP)	Dairyland Power Cooperative La Crosse Boiling Water Reactor ISFSI	6
		ML019819896	Dairyland Power Cooperative response to NRC Order EA-09-118	
		NS108073 (SGI)	Safety Evaluation Report by NSIR Related to Dairyland Power Cooperative ISFSI.	
	Procedures		LACBWR ISFSI UAA Program	18
		ACP 20-20.01	Administrative Control Procedure (ACP) 20-20.01 Training Program	
		ACP 20-20.08	Security Manager Qualification and Training Program	
		SCP-12.0	ISFSI Owner Controlled Area (OCA) Access Control	13
		SCP-12.2	Protected Area (PA)/Isolation Zone (IZ)/Security Alarm Station (SAS) Access Control	17
		SCP-13.0	ISFSI Facility Picture Identification Badge System	10
		SCP-13.1	ISFSI Key, Core, and Lock Control	9

81311	Procedures	SCP-14.0	ISFSI Security Alarm Station (SAS) General Operating Procedure	8
		SCP-14.1	ISFSI Security Communications General Operations	10
		SCP-15.0	ISFSI Security Patrols and Surveillance	9
		SCP-15.1	ISFSI Security Alarm Response	9
		SCP-15.3	ISFSI Compensatory Measures for Security Equipment Outages	19
		SCP-15.4	ISFSI Response to Terrorists Attack or Suspicious Activity	10
		SCP-15.5	ISFSI Integrated Response and Recovery Plan	9
		SCP-15.5	ISFSI Integrated Response/Recovery (08/15/23)	9
		SCP-16.0	LACBWR ISFSI Physical Security Plan Security Control Procedure (SCP) - ISFSI Security System Tests and Inspections	25
		SCP-17.2	ISFSI Security Weapons and Equipment Maintenance and Inspection	9
		SCP-18.0	ISFSI Facility Identification Badge Processing	9
		SCP-19.0	Armed Security Officer Qualification Records	6
		SCP-19.1	Armed Security Officer Qualification Process	6
		SCP-19.2	Security Shift Supervisor Qualification Process	6
		SCP-19.3	Nuclear Security Training Program	2