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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

January 19, 2016

EA-14-159

Mr. David A. Heacock
President and Chief Nuclear Officer
Dominion Resources
5000 Dominion Blvd.
Glen Allen, VA 23060-6711

**SUBJECT: MILLSTONE POWER STATION, UNIT 3 – SUPPLEMENTAL INSPECTION
REPORT NO. 05000423/2015407 AND ASSESSMENT FOLLOW-UP LETTER**

Dear Mr. Heacock:

On November 24, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection activity at Millstone Power Station (MPS) where it was identified that Unit 3 was not in compliance with a security-related requirement. Based on the results of that inspection, documented in NRC Inspection Report 05000336/2014201 and 05000423/2014201 dated January 5, 2015, and Final Significance Determination Report 05000423/2015405 dated April 5, 2015, the NRC identified a Greater-than-Green finding that resulted in an Action Matrix input to the security cornerstone beginning in the fourth quarter of 2014.

In response to this Action Matrix input, the NRC informed you that a supplemental inspection would be required. On November 5, 2015, MPS staff informed the NRC the station was ready for the supplemental inspection.

On December 10, 2015, the NRC completed the supplemental inspection and discussed the results of this inspection and implementation of your corrective actions with Mr. John Daugherty, Site Vice President, and other members of your staff. The inspectors documented the results of this inspection in the enclosed inspection report.

The NRC performed this supplemental inspection to determine if (1) the root and contributing causes for the significant issues were understood, (2) the extent of condition and extent of cause for the identified issues were understood, and (3) your completed or planned corrective actions were sufficient to address and prevent repetition of the root and contributing causes.

The NRC determined that the completed and planned corrective actions were sufficient to address the performance that led to the finding.

Enclosure contains Sensitive Unclassified Non-Safeguards Information. When separated from enclosure, this transmittal

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Based on the results of this inspection, the NRC concluded that, overall, the supplemental inspection objectives were met and no significant weaknesses were identified. Additionally, no findings of significance were identified.

Based on guidance in Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," and results of this inspection, the Greater-than-Green Finding will be closed and MPS Unit 3 will transition from the Regulatory Response Column of the NRC's Action Matrix to the Licensee Response Column effective January 1, 2016.

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter 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 Agencywide Document Access 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).

However, the material enclosed herewith contains Security-Related Information in accordance with 10 CFR 2.390 (d)(1) and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material in the enclosure will not be made available electronically for public inspection in the NRC Public Document Room or from the PARS component of the NRC's ADAMS. If you choose to provide a response and Security-Related Information is necessary to provide an acceptable response, please mark your entire response "Security-Related Information-Withhold from Public Disclosure under 10 CFR 2.390" in accordance with 10 CFR 2.390 (d)(1) and follow the instructions for withholding in 10 CFR 2.390 (b)(1). In accordance with 10 CFR 2.390 (b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

Sincerely,

/RA/

Raymond R. McKinley, Chief
Plant Support Branch 1
Division of Reactor Safety

Docket No. 50-423
License No. NPF-49

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/RA/

Raymond R. McKinley, Chief
Plant Support Branch 1
Division of Reactor Safety

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Distribution: See Next Page

Non-Public Designation Category: MD 3.4 Non-Public A.3

DOCUMENT NAME: G:\DRS\Plant Support Branch 1\Security\2015 IR Draft\Millstone\Millstone 2015407 95001 Rev 2.docx

ADAMS ACCESSION NUMBER: ML1516020A091 (Cover letter)

ADAMS ACCESSION NUMBER: ML1516020A089 (Cover letter w/enclosure)

Cover Letter: <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	
Cover Letter w/ Enclosure: <input checked="" type="checkbox"/> SUNSI Review		<input type="checkbox"/> Non-Sensitive <input checked="" type="checkbox"/> Sensitive		<input type="checkbox"/> Publicly Available <input checked="" type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRS	RI/DRS	RI/DRP	RI/DRS	
NAME	SMcCarver	JBream	GDentel	RMcKinley/DC	
DATE	1/7/16	1/7/16	1/8/16	1/19/16	

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Enclosure:

NRC Inspection Report No 05000423/2015407

w/Attachment: Supplemental Information

cc w/encl; w/OUO-SRI:

M. Brown, Security Department Manager

J. Semancik, Director, CT Dept of Energy
and Environmental Protection

cc w/o encl; w/o OUO-SRI: Distribution via ListServ

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JColaccino, DRP (R1DRPMAIL Resource)

RLorson, DRS (R1DRSMail Resource)

BSmith, DRS (R1DRSMail Resource)

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ADeFrancisco, DRP

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BPinson, DRP

JAmbrosini, DRP, SRI

LMcKown, DRP, RI

CHighley, DRP, RI

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EWharten, NSIR

CJohnson, NSIR

BDesai, DRS, RII

SOrth, DRS, RIII

MHaire, DRS, RIV

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No.: 50-423

License No.: NPF-49

Report No.: 05000423/2015407

Licensee: Dominion Nuclear Connecticut, Inc.

Facility: Millstone Power Station, Unit 3

Location: Waterford, CT

Dates: December 8 - 10, 2015

Inspectors: J. Bream, Physical Security Inspector
S. McCarver, Physical Security Inspector

Approved by: Raymond McKinley, Chief
Plant Support Branch 1
Division of Reactor Safety

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SUMMARY

IR 05000423/2015407; 12/08/2015 – 12/10/2015; Millstone Power Station, Unit 3; Supplemental Inspection – Inspection Procedure (IP) 95001.

The report covers an announced inspection conducted by two region-based physical security inspectors. No findings were identified during the inspection. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5, dated February 2014.

Cornerstone: Security

This supplemental inspection was performed in accordance with IP 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area," to assess Dominion's evaluation associated with non-compliance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55(b)(4). Specifically, NRC inspectors identified that prior to August 07, 2014, Dominion personnel were ineffective in analyzing and identifying site-specific conditions in target sets which affected specific measures needed to implement the requirements of 10 CFR 73.55 and to account for these conditions in the design of the Millstone Power Station (MPS) physical security plan. This performance deficiency was previously characterized as having low to moderate security significance (White), as documented in NRC Inspection Report 05000423/2015405 dated April 02, 2015. For additional information about the performance deficiency please refer to NRC Inspection Report 05000336/2014201 and 05000423/2014201 dated January 5, 2015, and Final Significance Determination Report 05000423/2015405 dated April 5, 2015, both of which are designated Safeguards Information.

During this supplemental inspection, inspectors determined Dominion personnel performed a comprehensive evaluation of this NRC-identified issue. Dominion's Root Cause Evaluation (RCE) identified one root cause (RC): The MPS cross-functional Target Set Assessment (TSA) group did not recognize the inadequate bases justifications associated with target sets. The RCE also identified the following contributing causes (CC): (1) guidance and direction contained in SY-AA-TR-202, regarding target set development, is vague and subject to interpretation; (2) leaders associated with TSA did not provide adequate oversight of the process; (3) defensible interim approaches and rationale documentation were not established for Regulatory Guide 5.81 aspects that are not fully and objectively defined; and (4) MPS did not take effective corrective actions to address shortfalls in implementation of protective strategy prior to the event. Dominion took immediate and long term corrective actions to address the issue including implementing immediate compensatory measures to ensure that physical protection measures were met.

Based on the results of this inspection, the inspectors concluded that Dominion had performed an acceptable root cause analysis of the identified issue, and in general, corrective actions, both completed and planned, were reasonable to address the issue. In accordance with the guidance contained in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program," the White finding will be closed effective at the beginning of the first calendar quarter 2016 (January 1, 2016).

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Findings

No findings were identified.

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REPORT DETAILS

4. OTHER ACTIVITIES

4OA4 Supplemental Inspection (95001)

.01 Inspection Scope

NRC staff performed this supplemental inspection in accordance with Inspection Procedure (IP) 95001 to assess Dominion's evaluation of a White finding affecting the security cornerstone in the safeguards strategic performance area. The inspection objectives were to:

- provide assurance that the root and contributing causes of risk-significant issues were understood;
- provide assurance that the extent of condition and extent of cause of risk-significant issues were identified; and
- provide assurance that the licensee's corrective actions (CA) for risk-significant issues were or will be sufficient to address the root and contributing causes and to preclude repetition.

Dominion's MPS, Unit 3, received an input for the Regulatory Response Column of the NRC's Action Matrix in the security cornerstone in the fourth quarter of 2014 as a result of one inspection finding of low to moderate security significance (White). The finding, characterized as having White security significance, was based on a risk analysis performed by the staff using the Baseline Security Significance Determination Process, as discussed in NRC Inspection Report (IR) 05000423/2015405 and was associated with not analyzing site-specific conditions and accounting for those conditions in design of the physical protection program.

Dominion personnel informed the NRC on November 05, 2015, of their readiness for the supplemental inspection after completing root cause evaluation (RCE) 001129 to identify the root and contributing causes that resulted in the White finding.

NRC inspectors reviewed Dominion's RCE in addition to other evaluations conducted in support of, and as a result of the RCE and CAs taken or planned to address the identified causes. The inspectors also interviewed Dominion MPS personnel to ensure the root and contributing causes and the contribution of safety culture components were understood and CAs taken or planned were appropriate to address the causes and preclude repetition.

Enclosure

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.02 Evaluation of the Inspection Requirements

02.01 Problem Identification

- a. IP 95001 requires that the inspection staff determine that the licensee’s evaluation of the issue documents who identified the issue (i.e., licensee-identified, self-revealing, or NRC-identified) and the conditions under which the issue was identified.

The inspectors determined that the Dominion RCE adequately documented the conclusion that the performance issue was NRC-identified in August 2014 and contained an adequate timeline of major events both leading up to and following identification. The RCE determined that identification occurred when the NRC determined a certain piece of support equipment in Unit 3 required operator action outside the control room in order to remain in operation and meet its function in accordance with the site specific target sets for Unit 3 during a protracted Security event. However, the site specific analyses in support of the target sets had failed to identify that the equipment would not maintain its required function. Dominion failed to identify the necessary operator actions to maintain operation of the identified piece of support equipment.

- b. IP 95001 requires that the inspection staff determine that the licensee’s evaluation of the issue documents how long the issue existed and prior opportunities for identification.

The timeline of major activities contained in the RCE identified that prior opportunities for identification existed as follows:

- March 21, 2008: Millstone procedure SCPIP-2, “Detection of Impending Attack, Threat/Direct Armed Attack,” Revision 001-05, was revised to remove a component from a target set as a result of the 2008 Target Set Analysis review, causing MPS to not be in compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) 73.55.
- The 2008 target set analysis team determined that coping time did not apply but did not document the decision nor rationale for the decision. The documentation should have been maintained per procedure but was not. Had the information been retained, it may have provided an opportunity for the 2013 Target Set Assessment team to revisit the decision regarding target set equipment and coping time.
- 2008 – 2012, each target set review following the approved 2008 review did not identify the non-compliance created in March 2008.
- During the 2013 target set analysis, target set support equipment was not adequately considered.
- Following an NRC inspection of the MSP target sets in December 2013, NRC observations regarding the MPS target set review process were not evaluated.

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The inspectors determined Dominion's evaluation was adequate with respect to how long the issue existed and prior opportunities for identification.

- c. IP 95001 requires that the inspection staff determine that the licensee's evaluation documents the plant specific risk consequences, as applicable, and compliance concerns associated with the issue(s).

The NRC determined this issue was a low to moderate security significance finding (White), as documented in NRC Final Significance Determination Report 05000423/2015405. Dominion's RCE documented that the issue identified the potential for loss of a specific target set due to failing to consider support equipment associated with the target set and that failure to protect the target set would eventually result in core damage.

The inspectors reviewed the Dominion assessment of plant specific risk and concluded that Dominion personnel appropriately documented the risk consequences and compliance concerns associated with the issue.

- d. Findings

No findings were identified.

02.02 Root Cause, Extent of Condition, and Extent of Cause Evaluation

- a. IP 95001 requires that the inspection staff determine that the licensee evaluated the issue using a systematic methodology to identify the root and contributing causes.

The inspectors determined that Dominion evaluated the issue using a systematic methodology to identify root and contributing causes in accordance with Dominion procedure, PI-AA-300-3004, "Cause Evaluation Methods," Revision 5.

The inspectors identified that Dominion utilized the following systematic methods to complete the RCE:

- data gathering through interviews and document review;
- Comparative Timeline Analysis;
- Event and Causal Factor Charting; and
- Why Staircase.

The inspectors verified that the methods were appropriately applied by reviewing attachments to the RCE documents, and verified that the root and contributing cause conclusions were consistently understood and supported by Dominion's staff through the conduct of interviews.

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- b. IP 95001 requires that the inspection staff determine that the licensee's RCE was conducted to a level of detail commensurate with the significance of the issue.

The inspectors determined that Dominion's RCE included the evaluation methods discussed in the previous section. The inspectors concluded that the level of detail in the RCE was commensurate with the significance of the issue and appropriately identified the root cause (RC) associated with the issue. The RCE identified the RC of the issue as a failure of the MPS cross-functional TSA group to recognize the inadequate bases justifications associated with target sets. Dominion concluded contributing causes (CCs) included: (1) guidance and direction for implementation of SY-MP-PLN-180, Protective Strategy, regarding protective strategy documentation development and maintenance, including target set basis is vague and subject to interpretation; (2) leaders associated with TSA did not provide adequate oversight of the TSA process; (3) defensible interim approaches and rationale documentation were not established for Regulatory Guide (RG) 5.81 aspects that are not fully and objectively defined; and (4) MPS did not take effective CAs to address shortfalls in implementation of the protective strategy prior to this issue.

The inspectors concluded the results of the evaluation were based on rigorous application of systematic evaluation methods and the level of detail in the RCE was commensurate with the significance of the issue and appropriately identified the RC associated with the issue.

- c. IP 95001 requires that the inspection staff determine that the licensee's RCE included a consideration of prior occurrences of the issue and knowledge of operating experience.

The inspectors determined that Dominion's RCE included an evaluation of internal and external operating experience. The evaluation included a search of the Nuclear Energy Institute (NEI) Advanced Taskforce Operations Management (ATOM) security network for sharing operating experience (OE), NRC generic communications for security related OE, and the MPS corrective action program. This search and review of OE did not identify information associated with target set assessment and operator action timelines.

The inspectors concluded that the Dominion RCE included a review of prior internal and external occurrences of the issue and knowledge of prior operating experience.

- d. IP 95001 requires that the inspection staff determine that the licensee's RCE addresses the extent of condition and extent of cause of the issue.

The inspectors determined that Dominion's RCE considered the extent of condition associated with ineffective implementation of the MPS protective strategy and identification of target set component support equipment and functions. The Security Department, Operations, and other departments, as needed, re-evaluated the Target Sets for both units with an added focus on consideration of support equipment associated with target set equipment. Minor issues identified on both units were corrected.

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The inspectors identified deficiencies in the completeness of documentation of conclusions and bases for additional target set equipment that might be susceptible to the original performance deficiency. However, through interviews, the inspectors determined that Dominion was able to demonstrate that the extent of condition appropriately evaluated other target set equipment for similar vulnerabilities.

The inspectors determined that the RCE also included a review of extent of cause. The extent of cause review identified that other licensee programs were potentially susceptible to the failure of cross functional teams to recognize inadequate bases justifications. The inspectors identified that CAs were assigned to fire protection, emergency planning, and beyond design basis teams to review bases and assumptions to verify conclusions were supportable.

The inspectors concluded the RCE appropriately considered both the extent of condition and the extent of cause.

- e. IP 95001 requires that the inspection staff determine that the licensee’s root cause, extent of condition, and extent of cause evaluations appropriately considered the safety culture components as described in Inspection Manual Chapter (IMC) 0310.

The inspectors determined that in accordance with Attachment 5 of PI-AA-300-3001, “Root Cause Evaluation,” Revision 6, Dominion’s RCE considered 10 performance traits and attributes of a positive safety culture. Weaknesses were identified in attributes such as: resources; teamwork; documentation; bases for decisions; consistent process; and problem evaluation. The investigation did not identify a significant breakdown in these areas but concluded it presented a central theme of not challenging poorly defined requirements.

The inspectors concluded Dominion’s RCE appropriately considered the safety culture components described in IMC 0305 in the determination of root and significant contributing causes.

- f. Findings

No findings were identified.

02.03 Corrective Actions

- a. IP 95001 requires that the inspection staff determine that (1) the licensee specified appropriate corrective actions for each root and/or contributing cause, or (2) an evaluation stating that no actions are necessary, is adequate.

The inspectors determined that Dominion initiated immediate compensatory CAs to restore compliance when the issue was identified until a time when long term CAs could be identified and implemented. The inspectors determined that appropriate credited operator actions were incorporated into the site specific target sets prior to securing the compensatory measure. Additionally, the inspectors performed a walkdown with

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knowledgeable Dominion operations personnel to verify that the credited operator actions were in compliance with the six criteria for operator actions contained in RG 5.81, Target Set Identification and Development for Nuclear Power Reactors.

Additionally, the inspectors determined that CAs to prevent recurrence of the RC were appropriately identified to verify other assumptions and bases contained in the site specific target sets contained sufficient documentation such that they were supportable and reasonable. The identified actions also contained interim and final effectiveness reviews to verify that actions taken have been effective in addressing the RC.

The inspectors also reviewed the CAs generated for the identified contributing causes. The inspectors noted that additional controls and commitments were assigned to various working groups, including operations and engineering, to formalize the annual target set review. Additionally, Dominion procedure SY-AA-TR-202, "Target Set Development, Identification, and Maintenance," was revised to incorporate lessons learned and better define roles and responsibilities.

The inspectors determined that the actions to resolve the RC and CCs listed in the RCE appeared to be appropriate. Additionally, process weaknesses had been corrected and target set analysis was being performed to a more rigorous and comprehensive standard.

- b. IP 95001 requires that the inspection staff determine that the licensee prioritized corrective actions with consideration of risk significance and regulatory compliance.

The inspectors determined that appropriate immediate CAs were implemented by Dominion personnel when the issue was identified to restored regulatory compliance. Additional CAs were prioritized in accordance with Dominion's corrective action procedure and appropriately considered risk significance and regulatory compliance. Corrective action due dates were commensurate with the complexity of the action, the significance of the event, and the probability of recurrence. The due dates were recommended by the RCE team and approved by the Corrective Action Review Board (CARB).

- c. IP 95001 requires that the inspection staff determine that the licensee established a schedule for implementing and completing its corrective actions.

The inspectors determined that Dominion's schedule for implementing and completing its CAs was developed in accordance with procedure PI-AA-200, "Corrective Action." Oversight of timeliness of CAs was being monitored by the CARB and CAP staff. At the time of the inspection, the majority of the identified CAs were complete. The inspectors determined the remainder of the actions, for example the effectiveness reviews, were appropriately scheduled in accordance with licensee procedures and goals.

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- d. IP 95001 requires that the inspection staff determine that the licensee developed quantitative and/or qualitative measures of success for determining the effectiveness of the corrective actions to prevent recurrence.

The inspectors determined that the RCE included a plan that required a review of the CAs to prevent recurrence as well as other CAs. The effectiveness review of the CAs to prevent recurrence will be completed in accordance with PI-AA-200-2002, "Effectiveness Reviews," by November 01, 2016. The inspectors determined that the review will include the following criteria: (1) conclusions are supported by operational limitations, design/licensing basis data, or engineering analysis; (2) the basis for revisions are documented and supported by operational limitations, design/licensing basis data, or engineering analysis data; and (3) documentation is completed for each element that is currently in place, or to be implemented. Non-applicability must be accompanied by a written rationale.

The inspectors determined qualitative and quantitative measures of success were developed to determine the effectiveness of the CAs to prevent recurrence.

- e. IP 95001 requires that the inspection staff determine that the licensee's planned or taken corrective actions adequately address a Notice of Violation (NOV) that was the basis for the supplemental inspection.

The NRC issued the preliminary Greater-than-Green finding in inspection report IR 05000336 and 05000423/2014201, dated January 5, 2015. The NRC determined the inspection finding was of at least low to moderate security significance, appropriately characterized as Greater than Green, and issued a final NOV to Millstone Power Station Unit 3 in inspection report IR 05000423/2015405, dated April 2, 2015. The NRC determined that Dominion had violated 10 CFR 73.55(b)(4) for the failure to analyze and identify site-specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of 10 CFR 73.55 and shall account for these conditions in the design of the physical protection program.

The inspector reviewed the interim compensatory measure that were put in place immediately following the inspection and the final credited operator action that was developed as a result of the RCE. Additionally, the inspectors determined that weaknesses in the target set evaluation process and associated CAs were appropriately identified. Finally, the inspectors reviewed the site specific protective strategy for changes as a result of identified CAs.

During the inspection, NRC inspectors confirmed Dominion's RCE and completed or planned CAs adequately addressed the NOV.

- f. Findings

No findings were identified.

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02.04 Evaluation of Inspection Manual Chapter 0305 Criteria for Treatment of Old Design Issues

Dominion personnel did not request credit for self-identification of an old design issue; therefore, this issue it was not evaluated against the IMC 0305 criteria for treatment of an old design issue.

40A6 Meetings, including Exit

On December 10, 2015, the inspectors presented inspection results to Mr. John Daugherty, Site Vice President, and other members of Dominion's Millstone Power Station staff. The inspectors verified no proprietary information was retained by the inspectors or documented in this report.

Regulatory Performance Meeting

Also on December 10, 2015, in accordance with IMC 0305, "Operating Reactor Assessment Program," NRC staff conducted a Regulatory Performance Meeting between Mr. Raymond McKinley, Chief of Plant Support Branch 1, NRC Region I, and Mr. John Daugherty, Site Vice President, and other members of Dominion's Millstone Power Station staff.

The purpose of the meeting was to discuss Dominion's CAs in response to the White Finding and NOV, the removal of the White Finding as an input within the NRC's Action Matrix, and the transition of Millstone Unit 3 to the Licensee Response column of the NRC's Action Matrix effective January 1, 2016.

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ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

J. Daugherty, Site Vice President
M. Brown, Manager, Nuclear Protection Services
T. Cleary, Supervisor, Station Nuclear Licensing
P. Russell, Unit 3 Operations Shift Manager
L. Salyards, Licensing Engineer
M. Gelinis, Coordinator Nuclear Security Programs
R. Seel, Supervisor, Project Management
T. Armogno, Project Manager
T. Fecteau, Design Engineer

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

05000423/2014201-01

VIO

Failure to Analyze
Site-Specific Conditions in
Target Sets

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LIST OF DOCUMENTS REVIEWED

Millstone Power Station, Units 2 and 3 – NRC Security Inspection Report 05000336/2014201 and 05000423/2014201 Preliminary Greater-Than-Green Finding (SGI)
Final Significance Determination for a Security Related Greater Than Green Finding and Notice of Violation (NRC Inspection Report No. 05000423/2015405) – Millstone Power Station, Unit 3 (SGI)
Dominion Nuclear Connecticut, Inc., Millstone Power Station Unit 3 Reply to a Notice of Violation: EA-14-159, NOV 05000423/2015405-01 dated May 14, 2015 (SGI)
PI-AA-200, Corrective Action, Revision 28
PI-AA-300-3001, Root Cause Evaluation, Revision 6
PI-AA-300-3004, Cause Evaluation Methods, Revision 5
RCE 001129, Root Cause Evaluation for NOV for Incomplete Analysis and Definition of PSP Target Sets, Revision 0
RCE 001129, Root Cause Evaluation for NOV for Incomplete Analysis and Definition of PSP Target Sets, Revision 1
RCE 001129, Root Cause Evaluation for NOV for Incomplete Analysis and Definition of PSP Target Sets, Revision 2
SY-AA-TR-202, Target Set Development, Identification, and Maintenance, Revision 4
SY-AA-TR-202, Target Set Development, Identification, and Maintenance, Revision 6
SO-15-009, Standing Order, 2 C OP 200.2, "Response to Security Event," Operator Responsibilities
GO-MP-0220, Annual Target Set Analysis Review, Revision 0
GO-MP-0220, Annual Target Set Analysis Review, Revision 2
GO-MP-0221, Target Set Review Documentation, Revision 0
C OP 200.2, Response to Security Events, Revision 004-05
C OP 200.2, Response to Security Events, Revision 006
ETE-NAF-2014-0124, Millstone Unit 3, Evaluation of Extended Loss of All AC Power and Resultant Loss of TDAFW Flow Control, Revision 2 (SRI)
SY-MP-PLN-180, Protective Strategy, Revision 13 (SGI)

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LIST OF ACRONYMS

ADAMS	Agencywide Documents Access and Management System
ATOM	Advanced Taskforce Operations Management
CA	Corrective Action
CAP	Corrective Action Program
CC	Contributing Cause
CAPR	Corrective Action to Prevent Recurrence
CARB	Corrective Action Review Board
CFR	Code of Federal Regulations
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
MPS	Millstone Power Station
NEI	Nuclear Energy Institute
NOV	Notice of Violation
NRC	Nuclear Regulatory Commission
OE	Operating Experience
OOU-SRI	Official Use Only-Security Related Information
PA	Protected Area
PARS	Publicly Available Records System
RC	Root Cause
RCE	Root cause evaluation
RG	Regulatory Guide
SIG	Safeguards Information

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