



Exelon Generation®

Three Mile Island Nuclear Station, Unit 1
441 S. P.O. Box 480
Middletown, PA 17057

EA-20-103
72.4

TMI-21-005

January 28, 2021

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 1
Renewed Facility License No. DPR-50
NRC Docket No. 50-289 and 72-077

Subject: Supplemental Response to NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation"

- References: (1) NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation", dated August 27, 2020
- (2) Response to NRC Order EA-20-103, "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access at the Three Mile Island Generating Station Independent Spent Fuel Storage Installation", dated September 15, 2020

Pursuant to NRC Order EA-20-103 (Reference 1), Exelon Generation Company, LLC (Exelon) provided the 20-day response required by Sections III.B and III.C of the Order (Reference 2). In Reference 2 Exelon stated it would provide a detailed response to Attachments 1 and 2 of the order and will include the revised Three Mile Island Nuclear Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan (Security Plan), associated analysis, and supporting documentation. This letter supplements the original response and provides the detail response to demonstrate compliance to Order EA-20-103.

Attachment 1 and Attachment 2 to this letter provides the detailed response to Attachments 1 and 2 of EA-20-103 respectively. Attachment 3 of this letter contains the

ATTACHMENTS 1,3 AND 4 CONTAIN SAFEGUARDS INFORMATION
UPON SEPARATION THIS PAGE IS DECONTROLLED

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approved Revision 24 of Three Mile Island Nuclear Station Security Plan providing the details of protecting the TMI Independent Spent Fuel Storage Installation (ISFSI). Revision 24 of the Security Plan has not been implemented at TMI, since the ISFSI is not completed. This plan will be implemented prior to commencing the ISFSI loading campaign, scheduled for later this year. In the unlikely event that an additional revision to the Security Plan is required prior to implementation of Revision 24, Exelon will provide a supplement to this response to reflect the changes and impact to the plan being reviewed to support the Order Response. Attachment 4, 5 and 6 provides the associated analysis and support documentation necessary to perform the regulatory review. The TMI Integrated Response Plan ISFSI contained in Attachment 5 is currently a DRAFT document. Exelon will provide a supplement to this response to provide the final version of the document when it is finalized.

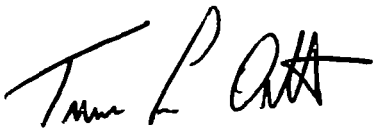
Attachments 1, 3 and 4 contain Safeguards Information. Therefore, Exelon requests that this information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," paragraph (d)(1), and 10 CFR 73.22, "Protection of Safeguards Information: Specific Requirements," paragraph (a)(1)(i).

Attachment 5 contains either Official Use Only – Law Enforcement Sensitive, Security Related, or Company Confidential/Proprietary Information. Therefore, Exelon requests that this information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," paragraph (a)(5), a(7), or (d)(1).

This letter does not contain any regulatory commitments.

Should you have any questions concerning this letter, please contact Mr. Daniel Kenny at (717) 948-8855.

Respectfully,

A handwritten signature in black ink, appearing to read 'Trevor L. Orth', with a stylized flourish at the end.

Trevor L. Orth
Site Decommissioning Director
Three Mile Island Nuclear Station, Unit 1

Attachments:

1. Three Mile Island Unit 1 Detailed Response to Attachment 1 "Additional Security Measures for Physical Protection of Dry Independent Spent Fuel Storage Installations (ISFSIs)," of EA-20-103
(Contains Safeguards Information)
2. Three Mile Island Unit 1 Detailed Response to Attachment 2 "Additional Security Measures for Access Authorization and Fingerprinting at Independent Spent Fuel Storage Installations," of EA-20-103
3. Three Mile Island Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 24
(Contains Safeguards Information)
4. Safeguards Related Implementing and Supporting Documentation **(Contains Safeguards Information)**
5. Implementing and Supporting Documentation Subject to Withholding per 10 CFR 2.390
6. Other Supporting Documentation Not Subject to Withholding requirements

cc: w/o attachments
Regional Administrator – NRC Region I
Project Manager, NMSS – Three Mile Island, Unit 1
Decommissioning, ISFSI and Reactor Health Physics Branch, NRC Region I
Director, Bureau of Radiation Protection - PA Department of Environmental Resources

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bcc (w/o attachments):

VP Nuclear Security, Licensing and Regulatory (Cantera)
VP License Renewal and Decommissioning
Sr. Manager, Decommissioning
Director - Licensing and Regulatory Affairs – (East)
Sr. Manager – Licensing and Regulatory Affairs – (East)
Licensing Records)
Commitment Tracking Coordinator – KSA 3-E
M. Kunzwiler – Cantera
D. Pallansch – Cantera
W. Trump – Kennett Square

ATTACHMENTS 1,3 AND 4 CONTAIN SAFEGUARDS INFORMATION
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Attachment 1

Three Mile Island Unit 1 Detailed Response to Attachment 1 "Additional Security Measures for Physical Protection of Dry Independent Spent Fuel Storage Installations (ISFSIs)," of EA-20-103

(Contains Safeguards Information)

Contents:

1. Response to Additional Security Measures for Physical Protection of Dry Independent Spent Fuel Storage Installations
2. Verification of Accuracy Document Rev 0

ATTACHMENT CONTAIN ~~SAFEGUARDS INFORMATION~~
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Attachment 2

Three Mile Island Unit 1 Detailed Response to Attachment 2 "Additional Security Measures for Access Authorization and Fingerprinting at Independent Spent Fuel Storage Installations," of EA-20-103

Contents:

1. Response to Additional Security Measures for Access
Authorization and Fingerprinting at Independent Spent Fuel
Storage Installations

ATTACHMENT 2

**RESPONSE TO ADDITIONAL SECURITY MEASURES (ASMS) FOR ACCESS
AUTHORIZATION AND FINGERPRINTING AT INDEPENDENT SPENT FUEL
STORAGE INSTALLATIONS**

THREE MILE ISLAND

Response for Attachment 2

Section A.2 of Attachment 2 to the Order allows Licensees whose Independent Spent Fuel Storage Installation (ISFSI) is collocated with a power reactor to comply with an NRC-approved reactor access authorization program as an alternative means to satisfy the provisions of Section B through G of Attachment 2 to the Order. Section A.3 of Attachment 2 to the Order requires licensees to clearly distinguish which method they intend to use in order to comply with these ASMs. Three Mile Island chooses to comply with the U.S. NRC-approved reactor access authorization program as an alternative means to satisfy the provisions of Section B through G of Attachment 2 to the Order.

~~SAFEGUARDS INFORMATION~~

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Supplemental Response to Order EA-20-103

Attachment 3

Three Mile Island Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 24

(Contains Safeguards Information)

Contents:

1. Three Mile Island Nuclear Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan Rev 24
2. Figure 1
3. Figure 2
4. Figure 3
5. SY-AA-101-104-F-03 "Table of Changes for Security Plan Change Submittals"

ATTACHMENT CONTAIN ~~SAFEGUARDS INFORMATION~~
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~~SAFEGUARDS INFORMATION~~

Attachment 4

Safeguards Related Implementing and Supporting Documentation

(Contains Safeguards Information)

Contents:

1. C-1101-114-012 "Design Basis Threat Calculation Rev 0
2. 3961505-WP-102 "VBIED Blast Effects Assessment of Potentially Affected Key Assets for Three Mile Island NGS" Rev 0
3. LLEA MOU 9/25/20
4. SY-TM-101-501 "Security Contingency Response Guidance" Rev 13
5. SY-TM-101-503 "Physical Protection Measures for the Independent Spent Fuel Storage Installation" Rev 0

Attachment 5

Implementing and Supporting Documentation subject to Withholding per 10 CFR 2.390

Contents:

1. TMI Integrated Response Plan ISFSI DRAFT (**Official Use Only – Law Enforcement Sensitive**)
2. 10 CFR 73.55 Review Rev 0 (**Security Related Information**)
3. TMI-114-09-001 "Security System Overall Plan ISFSI" Rev 0 (**Exelon Propriety**)
4. TMI-114-09-002 "Security System Vehicle Barrier and Fence Layout ISFSI" Rev 0 (**Exelon Propriety**)
5. TMI-114-09-003 "Security System Camera Tower and Light Pole Layout ISFSI" Rev 0 (**Exelon Propriety**)
6. TMI-114-09-004 "Security System Microwave Layout ISFSI" Rev 0 (**Exelon Propriety**)
7. TMI-114-09-005 "Security System K12 Gate Area Enlarged Plan ISFSI" Rev 0 (**Exelon Propriety**)
8. ISFSI BRC Placement Rev 0 (**Exelon Propriety**)
9. EC 625309 "TMI ISFSI- EC#09- ISFSI Security System Design Change Package Attachment 1" Rev 0 (**Exelon Propriety**)
10. SY-AA-103-500 "Access Authorization Program" Rev 16 (**Exelon Propriety**)