



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

March 16, 2021

Mr. David Rhoades
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION – SECURITY BASELINE
INSPECTION REPORT 05000237/2021402 AND 05000249/2021402

Dear Mr. Rhoades:

On February 5, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Dresden Nuclear Power Station and discussed the results of this inspection with Mr. Pat Boyle 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,

/RA/

Steven K. Orth, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 05000237 and 05000249
License Nos. DPR-19 and DPR-25

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to David Rhoades from Steven K. Orth dated March 16, 2021.

SUBJECT: DRESDEN NUCLEAR POWER STATION – SECURITY BASELINE
INSPECTION REPORT 05000237/2021402 AND 05000249/2021402

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers: 05000237 and 05000249

License Numbers: DPR-19 and DPR-25

Report Numbers: 05000237/2021402 and 05000249/2021402

Enterprise Identifier: I-2021-402-0052

Licensee: Exelon Generation Company, LLC

Facility: Dresden Nuclear Power Station

Location: Morris, IL

Inspection Dates: January 12, 2021 to February 05, 2021

Inspectors: A. Anderson, Physical Security Inspector
G. Bonano, Physical Security Inspector
J. Gilliam, Physical Security Inspector
J. Kutlesa, Physical Security Inspector
M. Ziolkowski, Sr Physical Security Inspector

Approved By: Steven K. Orth, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY

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

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 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. Publicly available IPs are located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), regional inspectors were directed to begin telework. The inspection documented below was determined that the objectives and requirements stated in the IP could be performed remotely.

SAFEGUARDS

71130.01 - Access Authorization

The inspectors evaluated the access authorization program. The following elements were evaluated:

Access Authorization (1 Sample)

- (1)
 - Tier I: All
 - Tier II: 02.05 a; 02.06 a, c; 02.07 a, b; 02.08 a, c
 - Tier III: 02.09; 02.10 a, b; 02.11 a

71130.02 - Access Control

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

Access Control (1 Partial)

- (1) (Partial)
 - Tier I: 02.01 a-e; 02.02 g; 02.03 a; 02.04 b-e; 02.05 a
 - Tier II: 02.06 a, c; 02.07 a; 02.08 a-d
 - Tier III: 02.09

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 03.17)
(1 Sample)

(1) 08/20/2020 through 02/05/2021

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On February 5, 2021, the inspectors presented the security baseline inspection results to Mr. Pat Boyle and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.01	Procedures	SY-AA-103-500	Access Authorization Program	16
		SY-AA-103-500-F-08	On Demand Behavioral Observation Form	000
		SY-AA-103-500-F-09	Behavioral Observation Program (BOP) - Annual Supervisor Review	000
		SY-AA-103-506	Utilizing The Personnel Access Data System (PADS)	016
		SY-AA-103-506-F-01	Request For Information	000
		SY-AA-103-506-F-02	PADS Monthly Review Form	000
		SY-AA-103-507	Review Criteria For Determining Trustworthiness and Reliability	007
		SY-AA-103-507-F-01	Reviewing Official Training and Assignment Documentation Form	001
		SY-AA-103-507-F-02	Access Authorization, Fitness For Duty, Determination-of-Fitness Review Form	000
		SY-AA-103-507-F-03	Adjudication of Potentially Disqualifying Information (PDI)	000
		SY-AA-103-507-F-04	Temporary Hold Notification Form	000
		SY-AA-103-507-F-05	Denial Letter Form	000
		SY-AA-103-507-F-06	Exelon Access Authorization (Licensee Employee) Reported Legal Action Log	000
	Self-Assessments	AR 4372870	Self-Assessment for NRC IP 71130.01 Access Authorization	12/29/2020
71130.02	Corrective Action Documents	AR 04379158	Security- Door 7 OOS	10/24/2020
	Miscellaneous	AR 04366707	Security - Keys and Cores Change Identified	09/01/2020
		AR 04397156	Security Ambulance Responded to Site	01/21/2021
		Security Aid DRE 020	Security Vital Area and Core Changeout Log	09/01/2020 - 09/05/2020
	Procedures	SY-AA-101-112	Exelon Security Search Processes	37

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		SY-AA-101-112-1004	Protected Area Search Processes	4
		SY-AA-101-112-1005	Owner Controlled Area Inspection Processes	2
		SY-AA-101-112-F-06	Protected Area Entry - Vehicle Search	009
		SY-AA-101-115	Controlling Gates and Power Operated Active Vehicle Barriers	015
		SY-AA-101-117	Processing and Escorting of Personnel and Vehicles	32
		SY-AA-101-120	Control of Security Access Control Devices	009
		SY-AA-101-120-F-01, Rev 002	Key Issuance Log - Non Security Department	12/1/2020 - 12/29/2020
	Self-Assessments	AR 4373108	Self-Assessment for 71130.02 Access Control	12/29/2020
71151	Miscellaneous		INPO Performance Indicator Summary Report	02/03/2021
		SY-AA-101-155-F-05	PIDS Equipment Logs - 9/1/2020 through 12/31/2020	001
	Procedures	SY-AA-101-155	Security Events and Nuclear Regulatory Commission Performance Indicators	010
		SY-AA-101-155	Security Events and NRC Performance Indicators	010