



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

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

October 6, 2021

Mr. Darrell Corbin  
Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT – SECURITY BASELINE INSPECTION  
REPORT 05000255/2021402

Dear Mr. Corbin:

On August 31, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Palisades Nuclear Plant and discussed the results of this inspection with Mr. Dale Lucy 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 black ink, appearing to read "S. Orth", is placed below the word "Sincerely,".

Signed by Orth, Steven  
on 10/06/21

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

Docket No. 05000255  
License No. DPR-20

Enclosure:  
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Darrell Corbin from Steven K. Orth dated October 6, 2021.

SUBJECT: PALISADES NUCLEAR PLANT – SECURITY BASELINE INSPECTION  
REPORT 05000255/2021402

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**U.S. NUCLEAR REGULATORY COMMISSION**  
**Inspection Report**

Docket Number: 05000255

License Number: DPR-20

Report Number: 05000255/2021402

Enterprise Identifier: I-2021-402-0060

Licensee: Entergy Nuclear Operations, Inc.

Facility: Palisades Nuclear Plant

Location: Covert, MI

Inspection Dates: June 14, 2021 to August 31, 2021

Inspectors: N. Egan, Senior Physical Security Inspector  
C. St. Peters, Resident 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 Palisades Nuclear Plant, 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), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

## 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-d, 02.07 b, 02.08 d-f
  - Tier III: 02.10 a

### 71130.05 - Protective Strategy Evaluation

On January 31, 2020, the Secretary of the United States Department of Health and Human Services declared a Public Health Emergency (PHE) on the public health risks of the COVID-19 coronavirus. In response to the PHE, Palisades Nuclear Power Plant pursued an exemption to security officer training and requalification requirements (ML20330A000 for specific exemptions approved). In addition to these exemptions, licensees implemented additional actions or alternatives in response to health concerns. As described in existing regulatory guidance (e.g., Regulatory Guide 5.75), licensees implemented measures to ensure annual Force-on-Force exercises were conducted as safely as possible while maintaining the requirements to simulate as closely as practicable site specific conditions and minimizing the number and effects of artificialities associated with these exercises (Part 73, Appendix B, VI.C.3).

The inspectors evaluated the licensee's protective strategy through completion of the following procedure elements:

### Protective Strategy Evaluation (2 Samples)

- (1)
  - Tier I: All Requirements
  - Tier II: 02.05 a, 02.06 a-l, 02.06 m-n, 02.07 a, 02.07 d-e
  - Tier III: 02.09 a-b, 02.10 a, 02.11 a
- (2)
  - Observed annual Force-on-Force exercises conducted on 06/15/2021.

### 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 a-d, 02.06 a, 02.09 a
  - Tier III: 02.11 a, 02.12 a-b, 02.13 a, c

### 71130.09 - Security Plan Changes

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

#### Review Security Plan Changes (IP Section 02.01) (1 Partial)

- (1) (Partial)

The opportunity to apply this procedure was not available in accordance with Inspection Manual Chapter 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 Title 10 of the *Code of Federal Regulations*, Part 50.54(p)(2) since the implementation of this IP.

## **INSPECTION RESULTS**

No findings were identified.

## **EXIT MEETINGS AND DEBRIEFS**

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

- On August 31, 2021, the inspectors presented the security baseline inspection results to Mr. Dale Lucy and other members of the licensee staff.

## DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Procedures	EN-NS-204	Protection of Unclassified Safeguards Information	7
		EN-NS-224	SOCA Access Controls	3
		EN-NS-228	Search and Sealing of Material	2
		EN-NS-231	Protected Area Search	3
		EN-NS-236	Warehouse Material Search	0
		EN-NS-237	Lock and Key	0
	Self-Assessments	LO-PLPO-2021-00016	Access Control Pre-NRC Focused Self-Assessment	03/11/2021
71130.05	Corrective Action Documents	CR-PLP-2021-01599	SOCA	06/16/2021
		CR-PLP-2021-01601	Mask Lens	06/16/2021
		CR-PLP-2021-01602	Mask Checklist	06/16/2021
	Miscellaneous		Palisades Nuclear Plant Physical Security Plan	16
	Procedures	EN-NS-215	Conduct of Security Force Exercises and Drills	21
		EN-NS-215-01	Tactical Response Drills	0
		EN-NS-215-02	Annual Force-on-Force Exercises	0
		EN-NS-215-03	Triennial Force-on-Force Exercises	0
		EN-NS-216	Controller Responsibility Guidelines	12
		EN-NS-234	Force-on-Force Mock Adversary Program	2
		EN-NS-306	Development and Maintenance of Target Sets	6
	Self-Assessments	LO-PLPLO-2021-00017	IP 71130.05 Protective Strategy Evaluation and Performance Evaluation Program	02/12/2021
71130.07	Miscellaneous		National Rifle Association Approval Certificate for Semi-Automatic Daylight and Lowlight Handgun Qualification Courses	05/19/2021
			National Rifle Association Approval Letter for Semi-Automatic Rifle with Special Purpose Optic Qualification Course	12/19/2018
			National Rifle Association Approval Letter for Semi-Automatic Lowlight Rifle Qualification Course	07/22/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			National Rifle Association Approval Letter for Semi-Automatic Daylight Rifle Qualification Course	07/08/2021
		NSF-301-01	Tactical Qualification Course	4
71130.09	Miscellaneous		Palisades Nuclear Power Plant Physical Security Plan	17