



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

April 21, 2022

Ms. Connie Flohr, Manager
Department of Energy
Idaho Cleanup Project
1955 Fremont Ave., MS 1203
Idaho Falls, ID 83415

SUBJECT: THREE MILE ISLAND UNIT-2 INDEPENDENT SPENT FUEL STORAGE
INSTALLATION – INDEPENDENT SPENT FUEL STORAGE INSTALLATION
SECURITY INSPECTION REPORT 07200020/2022401

Dear Ms. Flohr:

On March 31, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Idaho Operations Office and discussed the results of this inspection with you 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 cursive script that reads "Ray Kellar".

Signed by Kellar, Ray
on 04/21/22

Ray L. Kellar, P.E., Chief
Physical Security Branch
Division of Radiological Safety & Security

Docket No.: 07200020
License No.: SNM-2508

Enclosure:
NRC Inspection Report 07200020/2022401

THREE MILE ISLAND UNIT-2 INDEPENDENT SPENT FUEL STORAGE INSTALLATION –
INDEPENDENT SPENT FUEL STORAGE INSTALLATION SECURITY INSPECTION
REPORT 07200020/2022401 – DATED APRIL 21, 2022

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number: 07200020

License Number: SNM-2508

Report Number: 07200020/2022401

Enterprise Identifier: I-2022-401-0018

Licensee: Department of Energy

Facility: Idaho Operations Office

Location: Idaho Falls, Idaho

Inspection Dates: March 28, 2022, to March 31, 2022

Inspectors: C. Jewett, Physical Security Inspector

Approved By: Ray L. Kellar, P.E., Chief
Physical Security Branch
Division of Radiological Safety & Security

Enclosure

SUMMARY

This report covers a four-day period of an announced routine baseline inspection on security conducted by one physical security inspector from the NRC's Region IV office. There were no findings identified during this inspection.

This inspection consisted of a review and evaluation of the physical security program for the Three Mile Island – Unit 2 independent spent fuel storage installation licensed by the Department of Energy. The inspection consisted of observations of the independent spent fuel storage installation physical security related activities, interviews with personnel, and an examination of procedures and security records. The inspector used Inspection Procedure (IP) 81311 "Physical Security Requirements for Independent Spent Fuel Storage Installations" to conduct the inspection.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

REPORT DETAILS

IP 81311 Physical Security Requirements for Independent Spent Fuel Storage Installations (ISFSI)

Inspection Scope

02.02 Review of Specific License Requirements

- a. The inspector verified that spent nuclear fuel (SNF) and power reactor-related greater than class C waste is stored only within a protected area (PA) required by 10 CFR 73.51(b)(2)(i) and (10 CFR 73.51(d)(1).
- b. The inspector verified that only individuals who are authorized to enter the PA are granted access to the PA required by 10 CFR 73.51(b)(2)(ii).
- c. The inspector verified that the licensee is in compliance with site specific security orders (e.g., additional security measures) for access authorization and fingerprinting; also, that a log of authorized individuals is required pursuant to 10 CFR 73.51(d)(13)(i).
- d. The inspector verified the licensee can detect and assess penetrations through the isolation zone required by 10 CFR 73.51(d)(3).
- e. The inspector verified the licensee can provide timely communication to the designated response force whenever necessary required by 10 CFR 73.51(b)(2)(iv).
- f. The inspector verified that the physical protection system is designed to protect against loss of control of the facility that could be sufficient to cause a radiation exposure exceeding the dose as described in 10 CFR 72.106(b) and 10 CFR 73.51(b)(3).
- g. The inspector verified that the licensee has retained a copy of the physical protection plan for a period of 3 years or until termination of the license required by 10 CFR 73.51(c).
- h. The inspector verified that the licensee complies with the provisions for physical protection systems, components, and procedures that meet the performance objectives of 10 CFR 73.51(b)(1), 10 CFR 73.51(b)(2), and 10 CFR 73.51(d).
- i. The inspector verified the licensee provides illumination sufficient to permit adequate assessment of unauthorized penetrations of or activities within the PA required by 10 CFR 73.51(d)(2).
- j. The inspector verified the licensee's perimeter of the PA allows for continual surveillance and is protected by an active intrusion alarm system that is capable of detecting penetrations through the isolation zone; and that it is monitored in a continually staffed primary alarm station and in one additional continually staffed location required by 10 CFR 73.51(d)(3).
- k. The inspector verified that the primary alarm station is located within the PA; that it has bullet-resisting walls, doors, ceiling and floor; that the interior of the station is not visible from outside the PA; that a timely means for assessment of alarms is provided regarding

alarm monitoring; and that the redundant location provided a summary indication that an alarm has been generated required by 10 CFR 73.51(d)(3).

- l. The inspector verified the licensee's PA is monitored by daily random patrols pursuant to 10 CFR 73.51(d)(4); and a log of all patrols is required in accordance with 10 CFR 73.51(d)(13)(iii).
- m. The inspector verified the licensee's security organization has written procedures that provides for sufficient personnel per shift to ensure the monitoring of detection systems and the conduct of surveillance, assessment, access control, and communications to assure adequate response; that members of the security organization are trained, equipped, qualified, and requalified to perform assigned job duties in accordance with Appendix B to Part 73, sections I.A, (1)(a) and (b), B(1)(a), and the applicable portions of section II pursuant to 10 CFR 73.51(d)(5).
- n. The inspector verified the licensee has a documented liaison with a designated response force or local law enforcement agency (LLEA) to permit a timely response to unauthorized penetration or activities required by 10 CFR 73.51(d)(6).
- o. The inspector verified the licensee has a personnel identification system and a controlled lock system that limits access to only authorized individuals required by 10 CFR 73.51(d)(7).
- p. The inspector verified the licensee has redundant communications capability between onsite security force members and designated response force or LLEA required by 10 CFR 73.51(d)(8).
- q. The inspector verified that all individuals, vehicles, and hand-carried packages entering the PA are checked for proper authorization and visually searched for explosives before entry in accordance with 10 CFR 73.51(d)(9).
- r. The inspector verified the licensee's written response procedures have been established and maintained for addressing unauthorized penetration of, or activities within, the PA required by 10 CFR 73.51(d)(10).
- s. The inspector verified that all the licensee's detection systems and supporting subsystems include a tamper indicating system with line supervision; that the system, as well as surveillance/assessment and illumination systems, is maintained in an operable condition required by 10 CFR 73.51(d)(11).
- t. The inspector verified the licensee protects safeguards information against unauthorized disclosure required by (10 CFR 73.21 and 10 CFR 73.22).
- u. The inspector verified the licensee's physical protection program is reviewed once every 24 months by individuals independent of both physical protection program management and personnel who have direct responsibility for implementation of the physical protection program; that the physical protection program review includes an evaluation of the effectiveness of the physical protection system and a verification of the liaison established with the designated response force or LLEA pursuant to 10 CFR 73.51(d)(12).

- v. The inspector verified the licensee has retained the following documentation as a record for 3 years after the record is made or until termination of the license: a log of individuals granted access to the PA; screening records of members of the security organization; a log of all patrols; a record of each alarm received, identifying the type of alarm, location, date, and time when received, and disposition of the alarm; and the physical protection program review reports pursuant to 10 CFR 73.51(d)(13)(i)(ii)(iii)(iv) and (v).
- w. The inspector verified in accordance with any applicable security requirements and/or security orders that the licensee has implemented measures and processes for vehicle control measures into protected areas.
- x. The inspector verified in accordance with any applicable security requirements and/or security orders, that the licensee has implemented an insider mitigation program.
- y. The inspector verified that the licensee has developed offsite response coordination with LLEA as applicable to physical security requirements and/or security orders.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On March 31, 2022, the inspectors presented the security baseline inspection results to Connie Flohr, Manager, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
81311	Corrective Action Documents Resulting from Inspection	MIT-2021-039		
81311	Miscellaneous		Personal Key Inventory	03/29/2022
81311	Miscellaneous	CPP-1774	Unescorted Access Log	03/14/2022
81311	Miscellaneous	QLTMISP2	TMI-2 SPO II Qualifications	03/29/2022
81311	Miscellaneous	STI-NLF-SEC-FRM-061	TMI-2 Semi-Annual Lighting Assessment	12/15/2019
81311	Miscellaneous	SU-7EESDUS	Field Activity Report for Service Request 8852670	01/20/2022
81311	Miscellaneous	ZOJTM001	TMI-2 On-The-Job Training Guide and Checklist	02
81311	Procedures	504	Patrol Order	2022-01
81311	Procedures	505/505A	Post Orders	2021-01
81311	Procedures	512	Patrol Order	2021-01
81311	Procedures	CPP-1674	Central Alarm Station	03/10/2022
81311	Procedures	LWP-11301	INL Access Controls	18
81311	Procedures	MCP-4663	TMI-2 INTEC Security	0
81311	Procedures	MCP-519	INL Protective Force	45
81311	Procedures	MCP-533	CAS/SAS Operation and Operator Responsibilities	24
81311	Procedures	STI-NLF-SEC-020	TMI-2 ISFSI Physical Protection Plan	0
81311	Procedures	STI-NLF-SEC-029	TMI-2 Perimeter Performance Testing	1
81311	Work Orders	AR#2379	MFC Preventive Maintenance Justification for Work Control	07/16/2018