



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

September 21, 2022

Mr. Q. Shane Lies
Senior VP and Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR POWER PLANT – SECURITY BASELINE
INSPECTION REPORT 05000315/2022401; 05000316/2022401;
INDEPENDENT SPENT FUEL STORAGE SECURITY INSPECTION
REPORT 07200072/2022401

Dear Mr. Lies:

On August 29, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Donald C. Cook Nuclear Plant and discussed the results of this inspection with Ms. Kelly Ferneau, Site Vice President, 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 dark ink, appearing to be "S. Orth".

Signed by Orth, Steven
on 09/21/22

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

Docket Nos. 05000315; 05000316;
07200072
License Nos. DPR-58; DPR-74;
General License (ISFSI)

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®

Letter to Q. Shane Lies from Steven K. Orth dated September 21, 2022.

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers: 05000315; 05000316; 07200072

License Numbers: DPR-58; DPR-74; General License (ISFSI)

Report Numbers: 05000315/2022401; 05000316/2022401; 07200072/2022401

Enterprise Identifier: I-2022-401-0030; I-2022-401-0079

Licensee: Indiana Michigan Power Company

Facility: Donald C. Cook Nuclear Plant

Location: Bridgman, MI

Inspection Dates: June 20, 2022 to August 29, 2022

Inspectors: M. Ziolkowski, Senior Physical Security Inspector
P. Zurawski, Senior 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 Donald C. Cook 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.

The NRC also conducted an independent spent fuel storage installation security inspection, in accordance with the Spent Fuel Storage Oversight Process. The Spent Fuel Storage Oversight Process is the NRC's program for overseeing the safe storage of spent nuclear fuel. Refer to <https://www.nrc.gov/waste/spent-fuel-storage/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

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2201, "Security Inspection Program for Commercial Nuclear Power Reactors" and IMC 2690, "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations and for Title 10 of the *Code of Federal Regulations* (10 CFR), Part 71 Transportation Packaging." 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.

SAFEGUARDS

71130.02 - Access Control

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

Access Control (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.06 a; 02.07 a; 02.08 b, d - g, i
 - Tier III: 02.10 a

71130.04 - Equipment Performance, Testing, and Maintenance

The inspectors evaluated the security equipment testing and maintenance program. The following elements were evaluated:

Equipment Performance, Testing, and Maintenance (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 02.09 a; 02.11 a, d; 02.12 a
 - Tier III: 02.15 b, c

71130.09 - Security Plan Changes

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

Security Plan Changes (1 Sample)

- (1) Since the last NRC inspection of this program area, Security Plan Revision 21 was implemented based on your determination, in accordance with 10 CFR 50.54(p)(2), that the changes resulted in no decrease in safeguards effectiveness of the security plan, and that the revised security plan changed continues to meet the requirements of 10 CFR 73.55(b). The inspectors conducted a review of the security plan changes

to evaluate for potential decrease in safeguards effectiveness of the security plan. However, this review does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

PP01: Protected Area Security Equipment Performance Index Sample (IP Section 02.17) (1 Sample)

The inspectors verified licensee performance indicators submittals listed below:

- (1) Unit 1: July 1, 2021 through March 30, 2022
Unit 2: July 1, 2021 through March 30, 2022

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

81311 - Physical Security Requirements for Independent Spent Fuel Storage Installations

The inspectors evaluated the Physical Protection Program for the Independent Spent Fuel Storage Installation. The following elements were evaluated:

Physical Security Requirements for Independent Spent Fuel Storage Installations (1 Sample)

- (1) Requirements complete: 02.01 a - f

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 29, 2022, the inspectors presented the security baseline inspection results to Ms. Kelly Ferneau, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.02	Procedures	PMP-2060-SEC-006	Security Requirements For Plant personnel	40
		SPP-2060-SFI-206	Security Patrols	39
		SPP-2060-SFI-209	Protected Area Access/Exit Requirements	28
		SPP-2060-SFI-214	Security Core, Key, and Lock Program	28
		SPP-2060-SFI-308	Tests of Security Related Equipment	61
	Self-Assessments	GT-2021-10167-1	Gap Analysis Access Control Inspection	0
71130.04	Engineering Evaluations	SL-014566	Evaluation of Revised Vehicle Barrier System Layout	08/02/2018
	Miscellaneous		Berrien County Sheriff's Department of Manpower and Equipment Availability for Response to Emergencies	12/16/2021
		GM0749-24	FiberPatrol Technical Specifications	0
		LMS5xx	2D LiDar Sensors Operating Instructions	02/18/2022
	Procedures	SPP-2060-SFI-104	Site Protective Services Inspections	16
		SPP-2060-SFI-106	Security Conduct of Operations	42
		SPP-2060-SFI-205	Central and Secondary Alarm Station (CAS/SAS)	24
		SPP-2060-SFI-205-1	Alarm Dispatch and Response	5
		SPP-2060-SFI-302	Compensatory Measures	26
		SPP-2060-SFI-307	Security Equipment Maintenance	12
		SPP-2060-SFI-308	Tests of Security Related Equipment	61
		SPP-2060-SFI-	Security Firearms and Equipment Maintenance and	34

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		503	Accountability	
		SPP-2060-SFI-600	Security Data Sheets	33
	Self-Assessments	GT 2021-10166-1	Security Equipment Performance, Testing, and Maintenance	0
	Work Orders	C10004319001	Perform Security Microwave Zone PM	05/6/2020 to 02/24/2022
		WO 55495337-01	Perform Security Diesel Inspections	06/30/2020, 09/15/2021
		WO 55534852-01	Perform Electrical Checks on the Generator	06/29/2020
		WO 55534992-01	Check Hoses, Air Filter and Change Oil, Security Diesel Generator Engine	06/30/2021
		WO 55542154-01	12-SEC-UPS; Clean, Inspect Inverter and Batteries	10/21/2022
		WO 55548922-01	Perform Electrical Checks on the Generator	09/09/2021
71130.09	Miscellaneous		Donald C. Cook Nuclear Plant Security Plan	21
71151	Procedures	PMP-7110-PIP-001	Reactor Oversight Program Performance Indicator and Monthly Operating Report Data	20
81311	Miscellaneous	12105-336	D.C. Cook Independent Spent Fuel Storage Installation Security Blast Report	08/18/2010