



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713**

June 28, 2021

Mr. David P. Rhoades
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: THREE MILE ISLAND NUCLEAR GENERATING STATION – UNIT 1 –
SECURITY DECOMMISSIONING INSPECTION REPORT 05000289/2021401**

Dear Mr. Rhoades:

On June 10, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the permanently shut down Three Mile Island Generating Station (TMI) Unit 1. On-site inspections were performed on June 7 - 10, 2021. The inspection examined activities conducted under your license as they relate to security and compliance with the NRC rules and regulations and with the conditions of your license. The inspectors reviewed select procedures and records, observed activities, and interviewed site personnel. The NRC inspectors discussed the results of this inspection with Mr. Steve Minnick, Senior Manager of Maintenance and Projects, and other members of your staff.

Based on the results of the inspection, no violations were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

D. Rhoades

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No reply to this letter is required. Please contact Dana Caron at 610-337-5140 if you have any questions regarding this matter.

Sincerely,

Fred L. Bower, III, Chief
Security, Emergency Preparedness and Incident
Response (SEPIR) Branch
Division of Radiological Safety and Security

Docket No: 50-289
License No: DPR-50

Enclosure:
Inspection Report No. 05000289/2021401

cc w/encl: Distribution via LISTSERV®
D. Kenny, Manager, Nuclear Security
D. Allard, State Liaison Officer, PA

SUBJECT: THREE MILE ISLAND GENERATING STATION – SECURITY
 DECOMMISSIONING INSPECTION REPORT 05000289/2021401,
 DATED JUNE 28, 2021

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Cover Letter Enclosure X SUNSI Review				<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available
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DATE	6/23/2021	6/23/2021	6/23/2021	6/23/2021	6/28/2021

* concurrence via email

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I
INSPECTION REPORT

Docket No. 05000289
License No. DPR-50
Report No. 05000289/2021401
Enterprise Identifier: I-2021-401-0074
Licensee: Exelon Generation Company, LLC
Location: Middletown, PA 17057
Location Inspected: Three Mile Island Generating Station – Unit 1
Inspection Dates: June 7– June 10, 2021
Inspectors: Dana Caron, Senior Physical Security Inspector
Jeremiah Rey, Physical Security Inspector
Sammy McCarver, Physical Security Inspector
Approved by: Fred L. Bower, III, Chief
Security, Emergency Preparedness and Incident Response
Branch (SEPIR)
Division of Radiological Safety and Security

Enclosure

EXECUTIVE SUMMARY

Exelon Generation Company, LLC
Three Mile Nuclear Generating Station Unit 1
NRC Inspection Report No. 05000293/2021401

This report covers an announced security decommissioning program core inspection of the physical protection program at the permanently shut down Three Mile Island Nuclear Generating Station – Unit 1 performed June 7 – June 10, 2021. The objective of the inspection was to determine if activities involving the physical protection program, associated with the samples inspected, provide assurance that the licensee’s program is designed and implemented in a manner that protects against the design basis threat (DBT) of radiological sabotage. The U.S. Nuclear Regulatory Commission’s (NRC’s) oversight of the security of a shutdown nuclear power reactor is described in Inspection Procedure (IP) 81200, “Security.” Additionally, for reactors that have permanently shut down and entered decommissioning, violations of regulatory requirements are evaluated using the traditional enforcement process described in the NRC’s Enforcement Policy. Under traditional enforcement, violations of more than minor significance are assigned a severity level (SL) ranging from I (most significant) to IV (least significant).

Based on the results of this inspection, no violations of safety significance were identified.

REPORT DETAILS

Inspection Scope

Inspection activities were conducted using the appropriate portions of the IPs in effect at the beginning of the inspection unless otherwise noted. At the time of this inspection, 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) 2202 Appendix A, "Security Core Inspection Program." 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. 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.

In response to the COVID-19 Public Health Emergency declared on January 31, 2020, by the Secretary of the United States Department of Health and Human Services on the public health risks of the coronavirus, Three Mile Island Generating Station pursued an exemption to security officer training and requalification requirements (ML2016A391). In addition to these exemptions, licensees implemented additional actions or alternatives allowed in response to health concerns within existing regulatory guidance available in RG 5.75 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)

1. Access Control for Decommissioning Nuclear Power Reactors, IP 81200.02

a. Inspection Scope

The inspectors evaluated the access control program through completion of a minimum of 50% of the inspection requirements.

Access Control for Decommissioning Nuclear Power Reactors (1 Sample)

02.01 a, c - e, 02.02 c - g, i - k, 02.03 a - d, f - i, 02.05

b. Observations and Findings

No violations were identified.

c. Conclusions

The Three Mile Island Generating Station - Unit 1 access control program was in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

2. Protective Strategy Evaluation and Performance Evaluation Program for Decommissioning Nuclear Power Reactors, IP 81200.05

a. Inspection Scope

The inspectors evaluated the protective strategy and the performance evaluation program through completion of a minimum of 50% of the inspection requirements.

Protective Strategy Evaluation and Performance Evaluation Program for Decommissioning Nuclear Power Reactors, (2 Samples)

02.01 a - i, k - o, 02.02 a - h, k - v, 02.03, 02.04 a - c, e - l, 02.05

b. Observations and Findings

No violations were identified.

c. Conclusions

The Three Mile Island Generating Station – Unit 1 protective strategy and performance evaluation program was in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

3. Security Plan Changes for Decommissioning Nuclear Power Reactors, IP 81200.09

a. Inspection Scope

The inspectors evaluated the security plan changes through completion of the following inspection elements.

Security Plan Changes for Decommissioning Nuclear Power Reactors (1 Sample)

Since the last NRC inspection of this program area, Security Plan Revision 23 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 change 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.

b. Observations and Findings

No violations were identified.

c. Conclusions

The Three Mile Island Nuclear Generating Station - Unit 1 security plan change did not result in a non-compliance or violation of regulatory requirements, an adverse impact to the licensee's ability to detect, assess, interdict, and neutralize an adversarial force to protect against the DBT of radiological sabotage, or a site-specific vulnerability.

4. Review of Decommissioning Reactor Target Sets, IP 81200.14

a. Inspection Scope

The inspectors evaluated the security target set program through completion of the following inspection elements.

Review of Decommissioning Reactor Target Sets (1 Sample)

02.02 (a-e), 02.03, 02.04 (a, b)

b. Observations and Findings

No violations were identified.

c. Conclusions

The Three Mile Island Nuclear Generating Station - Unit 1, target set program was determined to be in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that informs the physical security program for protection against the DBT of radiological sabotage.

Exit Meeting Summary

On June 10, 2021, the inspectors presented the inspection results to Mr. Steve Minnick, Senior Manager of Maintenance and Projects, and other members of the licensee's staff. The inspectors verified that no proprietary information was retained by the inspectors or documented in this report.

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

S. Minnick, Senior Manager of Maintenance and Projects
D. Kenny, Site Security Manager

LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

None

INSPECTION PROCEDURES USED

IP 81200.02, Access Control for Decommissioning Nuclear Power Reactors
IP 81200.05, Protective Strategy Evaluation and Performance Evaluation Program for Decommissioning Nuclear Power Reactors
IP 81200.09, Security Plan Changes for Decommissioning Power Reactors
IP 81200.14, Review of Decommissioning Reactor Target Sets

LIST OF DOCUMENTS REVIEWED

Procedures

SY-TM-101-502, Target Sets, Revision 7
SY-TM-1007, Security Operational Duties, Revision 38
SY-TM-1530, Testing of Security Surveillance Systems, Revision 1
SY-AA-150-102, Security Drills and Exercises, Revision 0
SY-AA-101-120, Control of Security Access Control Devices, Revision 9
SY-AA-101-117, Processing and Escorting of Personnel, Revision 32
SY-AA-101-112-1004, Protected Area Search Processes, Revision 4
SY-AA-101-112-1005, Owner Controlled Area Inspection Processes, Revision 2

Miscellaneous

Three Mile Island Nuclear Station Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, Revision 23 (SGI)
NOSA-TMI-20-08, Fitness for Duty and Access Authorization Program Audit Report

Miscellaneous (Cont'd)

NOSA-TMI-21-01, Security Programs Audit Report

ECR 12-00002, One Hour Draining Time, Revision 0 (SGI)

Calc. 3961505-WP-101, Checkpoint Approach Timeline Analysis, Revision 0

ABS Calculation 1586953-C-001, Vehicle Barrier Assessment and Redesign for the Updated 2003 DBV, Revision 0

Calc. 4071790-C-101, VBS Reconfiguration and Blast Effects Vulnerability Assessment, Revision 0

TMI LLEA MOU, 9/25/2020

Condition Reports

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04374519

04376124

04377467

04377849

04378859

04391271

04395627

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Condition Reports Generated

AR 04428086

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