



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

September 1, 2020

Mr. Bryan C. Hanson
Senior Vice President, Exelon Generation, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR GENERATING STATION – UNIT 1 –
SECURITY BASELINE INSPECTION REPORT 05000289/2020401

Dear Mr. Hanson:

On August 13, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the permanently shut down Three Mile Island Nuclear Generating Station. An on-site inspection was performed August 10 - 13, 2020. The inspection examined activities conducted under your license as they relate to security and compliance with the Nuclear Regulatory Commission's (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. Trevor Orth, Site Decommissioning Director, 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 and enclosure 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 Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

No reply to this letter is required. Please contact Jeremiah Rey at 610-337-5211 if you have any questions regarding this matter.

Sincerely,

9/2/2020

X /RA/

Signed by: Fred L. Bower
Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

B. Hanson

- 2 -

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

Enclosure:
Inspection Report No. 05000289/2020401

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

B. Hanson

- 3 -

SUBJECT: THREE MILE ISLAND NUCLEAR GENERATING STATION – UNIT 1
NRC INSPECTION REPORT NO. 05000289/2020401
DATED SEPTEMBER 1, 2020

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ADAMS ACCESSION NUMBER: **ML20245E331** (Cover letter w/enclosure) **(Publicly Available)**

Cover Letter w/Enclosure		<input checked="" type="checkbox"/> Non-Sensitive			<input checked="" type="checkbox"/> Publicly Available
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**U.S. NUCLEAR REGULATORY COMMISSION
REGION I
INSPECTION REPORT**

Docket No. 05000289

License No. DPR-50

Report No. 05000289/2020401

Enterprise Identifier: I-2020-401-0020

Licensee: Exelon Generation Company, LLC

Location: Middletown, PA 17057

Location Inspected: Three Mile Island Nuclear Generating Station – Unit 1

Inspection Dates: August 10 – August 13, 2020

Inspector: Jeremiah Rey, Physical Security Inspector
Sammy McCarver, Physical Security Inspector
Ken Hussar, Physical Security Inspector

Approved by: Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

EXECUTIVE SUMMARY

Exelon Generation Company, LLC
Three Mile Island Nuclear Generating Station – Unit 1
NRC Inspection Report No. 05000289/2020401

This report covers an announced decommissioning program core inspection of the physical protection program at the Three Mile Island Nuclear Generating Station – Unit 1 performed August 10 – August 13, 2020. 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) program for overseeing the security of a shut-down nuclear power reactor is described in Inspection Manual Chapter (IMC) 81200, "Security." Additionally, for reactors that have permanently shut down and entered into 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 the inspection, no violations of safety significance were identified.

REPORT DETAILS

Inspection Scope

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. Publicly available IPs are located 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 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), regional inspectors were directed to begin telework. The inspection documented below was completed through a combination of remote and on-site inspection.

1.0 Access Authorization for Decommissioning Nuclear Power Reactors, IP 81200.01

a. Inspection Scope

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

Access Authorization for Decommissioning Nuclear Power Reactors (1 Sample)

(1) 02.01 a – g, 02.02 a – g, i – o, 02.03 a, c – h, 02.04 a, c, d, g, 02.06

b. Observations and Findings

No findings were identified.

c. Conclusions

Three Mile Island access authorization program was in accordance with requirements, appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

2.0 Access Control for Decommissioning Nuclear Power Reactors, IP 81200.02

a. Inspection Scope

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

Access Control for Decommissioning Nuclear Power Reactors (1 Sample)

(1) 02.01 a – e, 02.02 a – d, f – l, 02.03 a, d, e, g, i, l, m, 02.04 a, b

b. Observations and Findings

No findings were identified.

c. Conclusions

Three Mile Island 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.

3.0 Equipment Performance, Testing and Maintenance for Decommissioning Nuclear Power Reactors, IP 81200.04

a. Inspection Scope

The inspectors evaluated the equipment, performance, testing and maintenance program through completion of a minimum of 50% of the inspection requirements.

Equipment Performance, Testing and Maintenance for Decommissioning Nuclear Power Reactors (1 Sample)

(1) 02.01, 02.02 a – g, i – k, 02.03 b, d, 02.04 a, c – e, g – k, 02.05 a – d, 02.06 a, b, f, 02.07 a – c, e, g, 02.08 a, 02.10

b. Observations and Findings

No findings were identified.

c. Conclusions

Three Mile Island equipment, testing and maintenance 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.

4.0 Security Training for Decommissioning Nuclear Power Reactors, IP 81200.07

a. Inspection Scope

The inspectors evaluated the security training program through completion of a minimum of 50% of the inspection requirements.

Security Training for Decommissioning Nuclear Power Reactors (1 Sample)

(1) 02.01, 02.02 a - f, 02.03 a - e, 02.04 a, b, 02.06 a - d, 02.07 a, b, 02.08 a, b, 02.12, 02.13

b. Observations and Findings

No findings were identified.

c. Conclusions

Three Mile Island security training program was in accordance with requirements, appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

Exit Meeting Summary

On August 13, 2020, the inspectors presented the inspection results to Mr. Trevor Orth, Site Decommissioning Director, 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

Mr. Trevor Orth, Site Decommissioning Director
D. Kenny, Site Security Manager

LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

None

INSPECTION PROCEDURES USED

IP 81200.01, Access Authorization for Decommissioning Nuclear Power Reactors
IP 81200.02, Access Control for Decommissioning Nuclear Power Reactors
IP 81200.04, Equipment Performance, Testing and Maintenance for Decommissioning Nuclear Power Reactors
IP 81200.07, Security Training for Decommissioning Nuclear Power Reactors

LIST OF DOCUMENTS REVIEWED

81200.01 Access Authorization

SY-AA-103-500, Access Authorization Program, Revision 15
SY-AA-103-514, Site Authorization for Unescorted Access, Revision 20
SY-AA-102, Exelon Generation Fitness for Duty Program, Revision 21

81200.02 Access Control

SY-AA-101-112, Exelon Security Search Processes, Revision 37
SY-AA-101-112-1004, Protected Area Search Processes, Revision 2
SY-AA-101-112-1005, Owner Controlled Area Search Processes, Revision 3
SY-TM-101-102-1001, Security System Component Degradation Compensatory Measures, Revision 10

81200.04 Equipment Performance, Testing and Maintenance

OP 1107-6, UPS Diesel Generator System, Revision 44
SY-AA-101-122, Testing Security Equipment, Revision 22
SY-AA-101-122-1001, Performance of Security System Tests, Revision 13

SY-AA-150-103, Firearms Maintenance, Testing and Accountability, Revision 2
SY-TM-1008, CAS/SAS/Supervisor Operations and Duties, Revision 34
SY-TM-1530, Testing of Security Surveillance Systems, Revision 1
C-221-011, Electrical Power One-Line Diagram for Security System (SGI Document)

81200.07 Security Training

SY-AA-150-105-F-12, Three Mile Island Physical Fitness Test (PFT), Revision 2
SY-AA-150-101, Exelon Nuclear Security Training, Revision 1
SY-AA-150-1009, Firearms Practice Range Maintenance, Revision 1
SY-AA-150, Nuclear Security Training Program, Revision 5
SY-AA-150-101-F-02, Armed Responder Individual Qualification Record, Revision 2
SY-AA-152-F-02, Tactical Course Description Template, Revision 1
Annual Written Exams, A, B, C

Condition Reports Generated

04362162, 04362445, 04362415, 04362420, 04362417, 04362787, 04362704, 04362459