

NyR 2020-011



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

October 21, 2020

Docket No. 07200031

License No. SFGL-13

Mr. David Yorke
ISFSI Security Manager
Yankee Atomic Electric Company
49 Yankee Road
Rowe, Massachusetts 01367

SUBJECT: YANKEE ATOMIC ELECTRIC COMPANY - INDEPENDENT SPENT FUEL
STORAGE SECURITY INSPECTION REPORT NO. 07200031/2020401

Dear Mr. Yorke:

On September 23, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an Independent Spent Fuel Storage Installation (ISFSI) security inspection at the Yankee Atomic Electric Company in Rowe, Massachusetts. The inspection covered the licensee's physical security plan and the October 16, 2002, Interim Compensatory Measures for Dry Independent Spent Fuel Storage Installations Order and was conducted using NRC Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations."

The enclosed inspection report documents the inspection results, which were discussed with you and other members of your staff, on September 23, 2020.

The inspection examined activities conducted under your license as they relate to security and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings 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's

D. Yorke

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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).

Sincerely,

X /RA/

Signed by: Fred L. Bower

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

Enclosure:
Inspection Report No. 07200031/2020401

cc w/encl:
W. Norton, President and CEO
J. Fay, General Counsel
J. Bourassa, ISFSI QA Manager
R. Capstick, Government Affairs
Board of Selectmen
Commonwealth of Massachusetts, SLO Designee

D. Yorke

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SUBJECT: YANKEE ATOMIC ELECTRIC COMPANY - INDEPENDENT SPENT FUEL STORAGE SECURITY INSPECTION REPORT NO. 07200031/2020401 DATED OCTOBER 21, 2020

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ADAMS ACCESSION NUMBER: **ML20294A294** (Cover letter w/enclosure) **(Publicly Available)**

Cover Letter w/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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* concur via email

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**U.S. NUCLEAR REGULATORY COMMISSION
REGION I
INSPECTION REPORT**

Docket No. 07200031

License No. SFGL-13

Report No. 07200031/2020401

Licensee: Yankee Atomic Electric Company

Address: 49 Yankee Road, Rowe, MA 01367

Location Inspected: Yankee Atomic Electric Company Independent Spent Fuel Storage Installation (ISFSI)

Inspection Dates: September 16 - 23, 2020

Inspectors: Jeremiah Rey, Physical Security Inspector
Kenneth Hussar, Physical Security Inspector

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

Enclosure

REPORT DETAILS

a. Inspection Scope

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) 2690, "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations." 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 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.

The inspectors evaluated this area by reviewing the Independent Spent Fuel Storage Installation (ISFSI) security plan, implementing procedures, and records; conducting interviews with responsible security personnel and plant employees; and performing walk-downs of the ISFSI.

The inspectors: (1) reviewed the access authorization program for the ISFSI; (2) verified and assessed the licensee's testing and maintenance program to assure the functionality and reliability of security equipment; and (3) verified that a rapid, capable response to safeguards contingency events had been appropriately developed and effectively implemented.

The inspectors conducted the following specific inspection activities and evaluated the program to determine if: (a) the access authorization program provided reasonable assurance that individuals granted unescorted access to the ISFSI Protected Area (PA) were trustworthy and reliable and did not constitute an unreasonable risk to public health and safety; (b) procedures were in place to ensure that vehicles accessing the ISFSI had proper authorization and were properly searched; (c) keys, locks, combinations, and associated hardware used in the ISFSI PA were properly controlled; (d) the intrusion detection system (IDS) had the ability to detect and assess unauthorized penetration of the ISFSI PA and adequate response capability existed; (e) alarms for the ISFSI IDS annunciated at an alarm station which was continually staffed; (f) the ISFSI PA was illuminated to facilitate adequate assessment of PA penetration or unauthorized activity; (g) a program was in place for testing and maintenance of the physical protection systems associated with the ISFSI; (h) the spent fuel storage was within a PA and was protected by two barriers; (i) the vehicle barrier system satisfied the design vehicle bomb attack requirements; (j) communications had been established between onsite security forces and a designated response force or local law enforcement agency (LLEA); (k) a

security organization with written procedures had been established; (l) members of the security organization were trained, equipped, qualified, and requalified to perform assigned duties; (m) the committed responders provided for an adequate armed response; (n) written response procedures were established and maintained; (o) training included ISFSI activities; (p) safeguards events were being properly reported; (q) audits of the physical protection system were conducted; (r) signs were posted in accordance with requirements; (s) the licensee established an emergency plan; (t) the response force or LLEA had unimpeded access to the ISFSI PA during contingency events; and (u) staffing, procedures, and resources were adequate to protect against radiological sabotage.

b. Findings and Observations

No findings were identified.

The inspectors reviewed approximately 19 condition reports, multiple self and independent assessments and an Apparent Cause Evaluation regarding deficiencies associated with the Yankee Atomic training program. The licensee implemented significant corrective actions to address these deficiencies. No violations of regulatory requirements were identified during this review.

Exit Meeting Summary

On September 23, 2020, the inspectors presented the inspection results to Mr. David Yorke ISFSI Manager, 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

D. Yorke, ISFSI Manager
J. Lenois, Security Program Manager
S. Hemingway, Asst. Director of Operations

LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

None

INSPECTION PROCEDURES USED

IP 81311, Physical Security Requirements for Independent Spent Fuel Storage Installations

LIST OF DOCUMENTS REVIEWED

Procedures

SP-2, PA Access Authorization Program, Revision 10
SP-4, Control of Safeguards and Security Related Information, Revision 20
SP-11, Testing and Maintenance of Security Equipment, Revision 29
SP-13, Lock and Key Control, Revision 16

Condition Reports

YA-CR-18-118	YA-CR-19-059	YA-CR-19-076	YA-CR-19-205
YA-CR-18-119	YA-CR-19-063	YA-CR-19-080	YA-CR-20-049
YA-CR-19-035	YA-CR-19-064	YA-CR-19-083	YA-CR-20-051
YA-CR-19-055	YA-CR-19-065	YA-CR-19-125	YA-CR-20-078
YA-CR-19-058	YA-CR-19-075	YA-CR-19-127	YA-CR-20-082

Condition Reports Generated

YA-CR-20-146
YA-CR-20-147
YA-CR-20-148