



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

October 5, 2022

Docket No. 07200039

License No. SFGL-21

Mr. Rob Desmarais, ISFSI Manager
Connecticut Yankee Atomic Power Company
Haddam Neck Plant
362 Injun Hollow Road
East Hampton, CT 06424-3099

**SUBJECT: CONNECTICUT YANKEE ATOMIC POWER COMPANY - NRC
INDEPENDENT SPENT FUEL STORAGE SECURITY INSPECTION
REPORT NO. 07200039/2022401**

Dear Mr. Desmarais:

On September 15, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an Independent Spent Fuel Storage Installation (ISFSI) security inspection at the Connecticut Yankee Atomic Power Company in East Hampton, Connecticut. 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 15, 2022.

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

R. Desmarais

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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,

Daniel L. Schroeder, Chief
Security, Emergency Preparedness and
Incident Response Branch
Division of Radiological Safety and Security

Enclosure:
Inspection Report No. 07200039/2022401

cc w/encl:

W. Norton, President and Chief Executive Officer
C. Pizzella, Treasurer
M. Marston, Director of Operations
J. Bourassa, ISFSI QA Manager
J. Fay, General Counsel
R. Snook, Connecticut Attorney General Office
L. Milardo, Town of Haddam
State of Connecticut SLO

SUBJECT: CONNECTICUT YANKEE ATOMIC POWER COMPANY - NRC
 INDEPENDENT SPENT FUEL STORAGE INSTALLATION SECURITY
 INSPECTION REPORT NO. 07200039/2022401 DATED
 OCTOBER 5, 2022

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ADAMS ACCESSION NUMBER: **ML22272A503** (Cover letter w/enclosure) **(Publicly Available)**

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

Docket No. 07200039

License No. SFGL-21

Report No. 07200039/2022401

Licensee: Connecticut Yankee Atomic Power Company

Address: 362 Injun Hollow Road, East Hampton, CT 06424-3099

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

Inspection Dates: September 14 - 15, 2022

Inspectors: Kenneth Hussar, Senior Physical Security Inspector
Michael Ordoyne, Physical Security Inspector
Thomas Eck, Physical Security Inspector

Approved by: Daniel L. Schroeder, Chief
Security, Emergency Preparedness and Incident Response
Branch, Division of Radiological Safety and Security

Enclosure

REPORT DETAILS

a. Inspection Scope

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

No findings were identified.

Exit Meeting Summary

On September 15, 2022, the inspectors presented the inspection results to Mr. Rob Desmarais, 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

R. Desmarais, 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 13
SP-8, Personnel Access Controls, Revision 25
SP-10, Security Force Patrols, Revision 11
SP-11, Testing and Maintenance of Security Equipment, Revision 39
SP-13, Lock and Key Control, Revision 15
SP-16, Application of Safeguards Compensatory Measures, Revision 8
SP-17, Weapons Control and Training Program, Revision 14
SP-18, Contingencies, Revision 15

Other Documents

CY-22-A03-01 – Quality Assurance Audit Report
Connecticut Yankee Physical Security Plan, Revision 4
Calc 24265-000-C-C00036
LLEA MOU, 2/15/2022

Condition Reports

CY-CR-20-161
CY-CR-20-164

CY-CR-21-081
CY-CR-21-082
CY-CR-21-111
CY-CR-21-162
CY-CR-22-031
CY-CR-22-162

Condition Reports Generated

CY-CR-22-250
CY-CR-22-251

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents and Access Management System
CFR	<i>Code of Federal Regulations</i>
IDS	Intrusion Detection System
ISFSI	Independent Spent Fuel Storage Installation
LLEA	Local Law Enforcement Agency
NRC	Nuclear Regulatory Commission
PA	Protected Area
PARS	Publicly Available Records