



Oregon

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To: Energy Facility Siting Council

From: Mark Reese, Radiological Emergency Planning Coordinator

Date: May 30, 2025

Subject: Agenda Item C (Action Item): Trojan Independent Spent Fuel Storage Installation – Council review of Revision 10 of the Security Plan for the June 13, 2025, EFSC Meeting

Attachments: Attachment 1: Security Plan Rev 10 Notification Letter
Attachment 2: Draft Public Statement

STAFF RECOMMENDATION

The Department recommends that the Council find that Revision 10 of the Security Plan for the Trojan Independent Spent Fuel Storage Installation (ISFSI) does not adversely affect the effectiveness of the plan, and that the plan continues to provide adequate provisions for the protection of public health and safety. The Department further recommends the Council authorize staff to issue the attached statement summarizing this finding with the Director.

BACKGROUND

By letter dated March 4, 2025, Portland General Electric (PGE) notified the Department that Revision 10 of the Security Plan for the Trojan ISFSI had been submitted to the Nuclear Regulatory Commission (NRC). A copy of this letter is provided in Attachment 1. The letter explains that Revision 10:

- Updates the plan to reflect the construction of a new administrative building, known as the Trojan Support Center (TSC), and updates the locations of an alarm station and upgraded security system components.
- Updates security incident reporting requirements to reflect new regulations adopted by the NRC under 10 CFR part 73.
- Updates security equipment and personnel requirements at the site based on recent operational changes.

The letter explains that PGE determined the changes did not decrease the effectiveness of the plan under 10 CFR 72.44, 72.78, and 72.186. Federal regulations do not require the NRC to formally review or approve changes to a security plan that do not reduce its effectiveness; however, ORS 469.530 and OAR 345-070-0030 require the Council and Director to review and

approve “all security programs attendant to a nuclear-fueled thermal power plant,” including all security programs and modifications to security programs for the ISFSI.¹ Under OAR 345-026-0340(4), PGE may make changes to the Security Plan that do not reduce its effectiveness without prior approval from the Council and Director but must notify the Department of the changes within 60 days after their implementation. The Department must then promptly notify the Council of the changes at a scheduled Council meeting, subject to the provisions of OAR chapter 345, division 070. On May 1, 2025, PGE notified the Department by email that Revision 10 was in effect.

The Security Plan contains safeguards information concerning the physical protection of the ISFSI that is protected under federal and state law. To maintain the confidentiality and protection of this information, Security Plans are not provided to the Department but are available for inspection by an authorized representative of the Council at the ISFSI site. The Council previously appointed Mark Reese, the Department’s Radiological Emergency Planning Coordinator, to inspect the Security Plan on its behalf.²

On May 14, 2025, Mr. Reese visited the ISFSI site and reviewed the updated Security Plan. Gus Zepeda, the Trojan Security Manager, facilitated the visit and review. Mr. Zepeda also gave Mr. Reese a tour of the new Trojan Support Center that houses all ISFSI operations and security staff as well as the new physical security measures and equipment in place at the site. Based on the site visit and review of the revised Security Plan, the Department recommends the Council find that Revision 10 does not reduce the effectiveness of the Security Plan and that PGE is taking appropriate steps and actions to ensure the continued safety and security of the stored spent nuclear fuel at the Trojan ISFSI.

Under OAR 345-070-0030, following its review of the revisions to the Security Plan, the Council must issue a joint statement with the Director that describes, without directly or indirectly breaching the confidentiality of the Plan, the nature and scope of the review conducted, the adequacy of the security program, and a general description of the security measures. A draft statement summarizing the review above is attached to this report. The Department requests the Council’s authorization to issue the statement with the Director.

¹ Also see ORS 469.300, 469.594, and OAR 345-070-0015(3).

² See minutes for the October 19, 2023, Council meeting.