

The inspectors observed that Exelon's action plan was inconsistent with the actions taken in response to increased cavity seal leakage. The actual actions taken were in response to visual identification of water intrusion into a sand bed bay, not as a result of monitoring cavity seal leakage. The inspectors noted that the action plan would not have directed a sand bed entry or sand bed internal inspection, because the cavity trough drain flow never exceeded 12 gpm. The inspectors also noted that water had entered the gap between the drywell shield wall and the drywell shell at a much lower value of cavity seal leakage than Exelon had calculated.