

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 2443 WARRENVILLE RD. SUITE 210 LISLE, IL 60532-4352

May 16, 2014

Mr. Michael J. Pacilio Senior VP, Exelon Generation Co., LLC President and CNO, Exelon Nuclear 4300 Winfield Road Warrenville, IL 60555

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION AT THE BRAIDWOOD NUCLEAR POWER STATION

Dear Mr. Pacilio:

This letter is to request information to support our biennial Problem Identification and Resolution (PI&R) inspection beginning July 14, 2014, at the Braidwood Nuclear Power Station. This inspection will be performed in accordance with the U.S. Nuclear Regulatory Commission (NRC) Baseline Inspection Procedure 71152.

Experience has shown that these inspections are extremely resource intensive both for the NRC inspectors and the utility staff. In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a list of documents required for the inspection.

The documents requested are copies of condition reports and lists of information necessary to ensure the inspection team is adequately prepared for the inspection. This information request may be provided in either CD-ROM/DVD/Thumb Drive (preferred) or hard copy format and should be ready for NRC review by June 25, 2014. Mr. Jay Lennartz, the Lead Inspector, will contact your staff to determine the best method of providing the requested information.

If there are any questions about the material requested, or the inspection in general, please do not hesitate to call or e-mail Mr. Lennartz at 630-829-9806 or <u>Jay.Lennartz@nrc.gov</u>.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150–0011.

M. Pacilio

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/ By JLennartz Acting For/

Eric R. Duncan, Chief Branch 3 Division of Reactor Projects

Docket Nos. 50–456 and 50–457 License Nos. NPF–72 and NPF–77

Enclosure: Requested Information to Support PI&R Inspection

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Requested Information to Support Problem Identification and Resolution (PI&R) Inspection

Please provide the information on a compact disc or thumb drive (one for each of four team members), if possible. Unless otherwise specified, the time frame for requested information is for the period of July 1, 2012, through the time the information request is answered. Please label any electronic files with content information.

In addition, inspectors will require computer access to the corrective action program (CAP) database while on site.

PROGRAM DOCUMENTS

- Copies of current administrative procedures associated with the corrective action program (CAP). This should include procedures related to: 1) corrective action process; 2) cause evaluations; 3) operating experience program; 4) self-assessment program; 5) maintenance rule program; 6) operability determination process; 7) degraded/non-conforming condition process (e.g., RIS 2005–20); 8) system health process or equivalent equipment reliability improvement programs; and 9) operational decision making issue (ODMI) process.
- 2. A current copy of the Employee Concerns Program/Ombudsman administrative procedure.
- 3. Description of any substantive changes made to the CAP since the last PI&R Inspection (June 2012). Please include the effective date with each listed change.

ASSESSMENTS

- 4. A copy of Quality Assurance (QA) audits of the CAP.
- 5. A list of completed self-assessments for those programs related to the CAP (e.g. Operating Experience, Maintenance Rule, etc.)
- 6. Copies of completed CAP self-assessments and the plan/schedule for future CAP self-assessments.
- 7. A chronological list of completed department and site self-assessments (include date completed).
- 8. A list of condition reports (CRs) initiated for findings or concerns identified in self-assessments and audits. Include a short description/title of the finding, its status, and include a cross-reference to the audit or self-assessment number.

CORRECTIVE ACTION DOCUMENTS

- 9. Copies of completed root cause evaluations.
- 10. A list of completed apparent cause evaluations with a brief description of the issue. Provide status of any actions developed as part of the evaluations. Include a reference, if not part of the apparent cause package, to the documents and/or CRs directing and tracking the actions.
- 11. A list of all open CRs sorted by significance level. Include CR number, date initiated, a brief description/title, affected system(s), significance level, and anticipated completion date, if available. This list should be grouped by responsible department and arranged in order of initiation date (oldest listed first).
- 12. A list of closed CRs sorted by significance level. Include CR number, date initiated, a brief description/title, affected systems(s), significance level, date closed. This list should be grouped by responsible department.
- 13. A list of open corrective actions, sorted by priority level, with a brief description/title, initiating date and due date. The list should be grouped by the responsible department.
- 14. A list of CRs captured in databases operated and/or maintained by the site's corporate office sorted by significance level. Include the date initiated, a brief description/title, site(s) affected, system(s) affected, significance/priority level, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed).
- 15. A list of completed effectiveness reviews. Include a cross-reference to the CRs for which the effectiveness review was conducted and, if applicable, CR numbers documenting any additional follow-up actions.
- 16. A list of CRs initiated for inadequate or ineffective corrective actions. Include the date initiated, a brief description/title, significance level, system affected, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed). Include a cross-reference to the CR or evaluation that generated the original corrective action.
- 17. A copy of any performance reports/indicators used to track CAP effectiveness for the past 18 months. End-of-quarter data will suffice; monthly reports are not required.

TRENDS

- 18. A list of CRs initiated for trends of conditions adverse to quality. Include the date initiated, a brief description/title, significance level, and status (if closed include date closed; if open, include scheduled date to be closed).
- 19. Copy of the most recent integrated plant trend report and departmental trend report(s).
- 20. Copies of all apparent, common and/or root cause evaluations regarding adverse equipment reliability and adverse human performance trends.

OPERATING EXPERIENCE

- 21. A copy of the most recent operating experience program effectiveness review.
- 22. A list of CRs initiated to evaluate industry and NRC operating experience, and NRC generic communications (e.g. bulletins, information notices, generic letters, etc.). Include date the CR was initiated, a brief description/title, and the status (if closed include date closed; if open, include scheduled date to be closed).

SYSTEMS AND COMPONENTS

- 23. A list of the top ten risk-significant systems, top ten risk-significant components and top ten risk-significant operator actions.
- 24. A list of test failures (in-service tests and Technical Specification surveillance tests) with a brief description of component/system that failed.
- 25. A list of all structures, systems and components (SSCs) that are classified as (a)(1) in accordance with the Maintenance Rule. Include: 1) date SSC entered (a)(1); 2) brief description/reason for being in (a)(1); and 3) status of action plan.
- 26. Copy of current system health report for SSCs classified as (a)(1).
- 27. A list of maintenance preventable functional failures. Include the CR number; a brief description of the system/component that failed; and date the MPFF occurred.
- 28. Copy of the station mystery list.

SAFETY CULTURE

29. Copies of assessments or evaluations (internal or external) regarding station and/or department safety culture/safety conscious work environment.

REGULATORY ISSUES

- 30. A list of CRs for issues (findings, violations, etc.) documented in NRC inspection reports. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed). Include open issues that were identified prior to July 1, 2012.
- 31. A list of CRs for licensee identified violations that have been documented in NRC inspection reports. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed). Include open issues that were identified prior to July 1, 2012.
- 32. A list of CRs associated with NRC identified issues. Include the CR number, brief description/title, date initiated and the status (if closed include date closed; if open, include scheduled date to be closed). Include open issues that were identified prior to July 1, 2012.

33. A list of degraded/non-conforming conditions. Include the CR number, brief description/title, date initiated and date closed or projected closeout date. Include open issues that were identified prior to July 1, 2012.

OPERATIONS

- 34. A list of control room deficiencies, operator workarounds and burdens, sorted by priority, with a brief description/title and corresponding CR and/or work order number.
- 35. A list of operability determinations/evaluations. Include a brief description/title, date initiated, date closed or date scheduled to be closed. Also include any open operability evaluations that were initiated prior to July 1, 2012.
- 36. A list of temporary modifications that were installed since July 1, 2012, with a brief description/title, installation date, and current status. Include any in-place temporary modifications that were installed prior to July 1, 2012.

5-YEAR REVIEW

- 37. A list of CRs regarding the Auxiliary Feedwater System that have been generated since July 1, 2009. Include the CR number, brief description/title, level of evaluation (i.e. root cause, apparent cause, common cause, etc.), date initiated, and the status (if closed include date closed; if open, include scheduled date to be closed).
- Copies 50.59 screenings or evaluations, operability evaluations and ODMIs, maintenance rule evaluations, and root and apparent cause evaluations completed since July 1, 2009, associated with the Auxiliary Feedwater System.
- 39. A list of CRs regarding the Essential Service Water System that have been generated since July 1, 2009. Include the CR number, brief description/title, level of evaluation (i.e. root cause, apparent cause, common cause, etc.), date initiated, and the status (if closed include date closed; if open, include scheduled date to be closed).
- 40. Copies of root and apparent cause evaluations completed since July 1, 2009, for age management degradation issues related to the Essential Service Water System.

<u>ADMIN</u>

- 41. A copy of the latest plant organizational chart and phone listing.
- 42. Scheduled dates, times, and location for all meetings associated with implementing the CAP (e.g. CR screening meetings, corrective action review board meetings). Include work order screening/assessment meetings.

Documents requested to be available on-site during the inspection:

- a. Updated Final Safety Analysis Report.
- b. Technical Specifications.
- d. Copies of any self-assessments and associated CRs initiated while preparing for this PI&R inspection.
- e. Quality Assurance Manual.
- f. A list of issues brought to the ECP/ombudsman and the actions taken for resolution.
- g. A list of the codes used in the CAP.

Other:

On the first day of the inspection, or early on the second day, please provide the inspection team a briefing/overview of your corrective action program. Include your expectations for personnel using the program and how the work order system fits into the overall scheme for addressing identified issues. Also include a demonstration on how to access the CAP data on the computer.

M. Pacilio

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Letter to Michael Pacilio from Eric Duncan dated May 16, 2014

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION AT THE BRAIDWOOD NUCLEAR POWER STATION

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