

***NRC's Annual  
Performance Assessment  
of Palisades for 2015***

**Nuclear Regulatory Commission - Region III  
South Haven, MI  
June 23, 2016**



# ***Introductions***

**Eric Duncan  
Branch Chief, Palisades  
NRC Region III**



# ***Purpose and Agenda***

## **Discuss NRC's Actions to Ensure the Safety of Palisades**

- **NRC Presentation**
- **Break**
- **Town Hall Discussion**



# ***NRC Inspections***

- **In 2015, more than 6700 hours were committed to Palisades for performing NRC inspections.**
- **Two full-time NRC resident inspectors are dedicated to Palisades to perform plant inspections and immediately respond to events.**
- **Additionally, region-based specialist inspectors perform inspections in focused areas including operations, maintenance, engineering, radiation protection, emergency preparedness, security, and spent fuel storage.**



# ***2015 Annual Assessment***

- **Palisades continued to operate safely.**
- **Palisades began 2015 under increased NRC oversight due to an issue of low to moderate safety significance associated with Occupational Radiation Safety that was identified in 2014.**
- **The NRC conducted a follow-up inspection and concluded that Palisades had appropriately addressed the issue.**
- **On October 1, 2015, the plant returned to normal NRC oversight.**



# ***2015 Annual Assessment***

- **No worker dose limits were exceeded.**
- **The increased NRC oversight was due to an issue in 2014 that involved the failure to use an NRC-approved method for determining the effective dose to workers wearing dosimeters on several areas of their bodies.**
- **NRC follow-up inspection concluded 1) the cause of the deficiency was understood, 2) the extent of the issue had been identified, and 3) corrective actions will prevent recurrence.**



## ***2015 Annual Assessment***

- **The NRC issued a Severity Level III Violation in 2015 when Palisades failed to provide complete and accurate information to the agency.**
- **Subsequent NRC review determined safety was not affected since no actual actions were taken by Palisades as a result of the incorrect information that was provided.**
- **A follow-up NRC inspection is in progress to review corrective actions.**



# ***Safety Conscious Work Environment (SCWE)***

- **Safety Conscious Work Environment - an environment where workers feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination.**
- **All NRC licensees and contractors are expected to establish and maintain a SCWE which contributes to the safe operation of NRC-regulated facilities.**





# ***SCWE Inspections***

- **NRC identified problems with SCWE in 2011.**
- **NRC continued to focus on SCWE for the past five years and conducted numerous inspections.**
  - **Inspections were performed by safety culture experts**
  - **Inspections included focus group discussions and individual interviews**
- **The last NRC inspection conducted in 2016 identified no SCWE concerns.**
- **The NRC will continue to evaluate SCWE through the normal baseline inspection program.**



## ***Review of Discrimination Allegations***

- **In December 2013, the NRC received discrimination claims for raising safety issues from two former supervisors.**
- **The NRC completed an extensive investigation in March 2015 concerning these allegations of discrimination.**
- **The NRC determined that the allegations were not substantiated.**
- **The Department of Labor (DOL) received claims from the same two supervisors alleging discrimination in December 2013.**



## ***Review of Discrimination Allegations***

- **The DOL review found reasonable cause for discrimination.**
- **The DOL focuses on labor issues while the NRC focuses on Nuclear Safety.**
- **In response to the DOL ruling, the NRC requested that Palisades describe actions to assure the DOL findings would not have an adverse impact on SCWE.**
- **The NRC reviewed Palisades' response and found it appropriate.**



## ***Safety Injection Refueling Water Tank (SIRWT) Investigation***

- **The NRC's Office of Investigations (OI) initiated an investigation in 2012 concerning SIRWT leakage.**
- **The NRC identified a violation involving the willful failure of plant personnel to enter SIRWT leakage information into the Corrective Action Program.**
- **The leakage did not affect plant or public safety.**
- **The SIRWT leakage issue was resolved in 2013.**
- **The NRC issued an Order in May 2016 that required Palisades to take comprehensive actions, including improving public communications.**



## ***Palisades 2.206 Petitions***

**2.206 Petition - allows any member of the public to request that the NRC take enforcement action, including action to modify, suspend, or revoke a nuclear plant's license.**

- **Two 2.206 Petitions were closed in 2015.**
  - **Primary coolant pump impeller degradation**
  - **Security department SCWE**
- **No 2.206 Petitions are currently open.**



## ***License Amendments of Public Interest***

- **Palisades submitted a License Amendment Request (LAR) in July 2014 to use alternate criteria to meet reactor vessel fracture toughness requirements for protection against pressurized thermal shock (PTS) events.**
- **Palisades submitted a LAR in November 2014 for approval of an analysis to meet 10 CFR Part 50, Appendix G, fracture toughness of the reactor vessel during normal operations.**
- **Following an extensive review, the NRC approved these LARs on November 23, 2015.**



# Contacting the NRC

- Report an emergency
  - (301) 816-5100 (call collect)
- Report a safety concern
  - (800) 695-7403 or e-mail: [Allegation@nrc.gov](mailto:Allegation@nrc.gov)
- NRC Public Affairs Officers
  - Vika Mitlyng (630) 829-9662
  - Prema Chandrathil (630) 829-9663
- General information or questions
  - [www.nrc.gov](http://www.nrc.gov)
  - Select “What We Do” for Public Affairs



# Reference Sources

- Reactor Oversight Process
  - <http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html>
- Public Electronic Reading Room
  - <http://www.nrc.gov/reading-rm.html>
- NRC Information Digest
  - <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1350/>
- Public Document Room
  - (800) 397- 4209 (Toll Free)







# ***Closing Remarks***

**Pat Loudon**  
**Director, Division of Reactor Projects**  
**NRC Region III**

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