

February 22, 2017
EN 17-007

OFFICE OF ENFORCEMENT
NOTIFICATION OF SIGNIFICANT ENFORCEMENT ACTION

Licensee: Exelon Generation Company LLC, Illinois EA-16-236
Dresden Nuclear Power Station
Docket No.: 50-249

Subject: ISSUANCE OF A FINAL SIGNIFICANCE DETERMINATION AND NOTICE OF VIOLATION

This is to inform the Commission that a Notice of Violation (NOV) will be issued on or about February 27, 2017, to Exelon Generation Company, LLC (Exelon), for a violation associated with a White Significance Determination Process finding identified during an inspection of Dresden Nuclear Power Station. The White finding, an issue of low to moderate safety significance, involved EXELON's failure to maintain design control for the high pressure coolant injection (HPCI) system auxiliary oil pump (AOP). The auxiliary oil pump is required for successful operation of the HPCI safety system. The pump was replaced in March 2015, however, EXELON did not recognize or control critical parameters which should be adjusted when installing a direct current shunt wound motor. Specifically, EXELON did not adjust an external variable shunt resistor that impacts critical operating parameters such as armature current, field current, and pump speed. This failure to correctly make adjustments to the external variable shunt resistor resulted in the auxiliary oil pump catching on fire during a routine maintenance run on June 27, 2016. The fire rendered the HPCI system unable to perform its required functions for reactor safety.

An NOV is being issued based on EXELON's failure to meet the requirements of Title 10 of the *Code of Federal Regulations*, Part 50, Appendix B, Criterion III, "Design Control," which requires, in part, that design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. EXELON failed to verify the adequacy of the design of the HPCI auxiliary oil pump motor, which is a component subject to the requirements of Criterion III cited above. In accordance with the NRC Enforcement Policy, this NOV is considered an escalated enforcement action because it is associated with a White significance determination process finding.

On December 5, 2016, the NRC issued a preliminary determination letter for this issue, provided EXELON the results of the inspection, and offered the opportunity to attend a Regulatory Conference or respond in writing. In a telephone conversation with Region 3, on December 15, 2016, the staff was informed that Exelon did not contest the characterization of the risk significance of the finding and declined the opportunity to discuss this issue in a Regulatory Conference or to provide a written response. However, Exelon subsequently submitted a letter, dated January 12, 2017, to Mr. W. Dean, Director, NRR, describing in specific detail several concerns with the SPAR model and the RASP Handbook that were utilized to determine the significance of the violation and further indicating that a modification to the White finding at Dresden should be considered. The staff determined that the letter constituted a written response by Exelon to the HPCI AOP issue and thoroughly evaluated the licensee's comments with regard to the specific determinations in the Dresden White finding addressed by this EN. The programmatic aspects of Exelon's letter will be addressed by separate correspondence from NRR when their review is complete. After reviewing the additional information, pertinent to

the finding, provided by Exelon in their letter of January 12, 2017, and the information developed during the inspection, the staff concluded that the finding is appropriately characterized as White.

It should be noted that the licensee has not been specifically informed of the enforcement action. The schedule of issuance and notification is:

Mailing of Final Significance Determination	February 27, 2017
Telephone Notification of Licensee	February 27, 2017

The State of Illinois will be notified.

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