



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

February 22, 2018

EA-17-203

Mr. Bryan C. Hanson
Senior VP, Exelon Generation Company, LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION - FINAL SIGNIFICANCE DETERMINATION OF A
WHITE FINDING WITH ASSESSMENT FOLLOW UP AND NOTICE OF
VIOLATION; NRC INSPECTION REPORT NO. 05000461/2018091

Dear Mr. Hanson:

This letter provides you the final significance determination of the preliminary White finding discussed in U.S. Nuclear Regulatory Commission (NRC) Inspection Report No. 05000461/2017011, dated January 26, 2018. A copy of the inspection report can be found in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html> under accession number ML18026A965. This finding involved the failure to correct a degraded condition identified as a result of the Division 3 Service Water (SX) pump failure in 2014 as required by Title 10 of the *Code of Federal Regulations* (CFR) Part 50, Appendix B, Criterion XVI, "Corrective action." The Division 3 SX pump is a component subject to the requirements of 10 CFR 50, Appendix B. The failure to correct the identified degraded condition involving corrosion of the SX pump sleeve resulted in the failure of the Division 3 SX pump to start on June 15, 2017. The sleeve corrosion resulted in the SX pump being unable to perform its intended safety function and becoming inoperable for a time longer than its technical specification allowed outage time.

In a letter dated February 2, 2018, your staff indicated that the Clinton Power Station did not contest the characterization of the risk significance of this finding. Additionally, the letter indicated that the Clinton Power Station declined the opportunity to discuss this issue in a Regulatory Conference or to provide a written response. According to NRC Inspection Manual Chapter (IMC) 0609, appeal rights only apply to those licensees that have either attended a Regulatory Conference or submitted a written response to the preliminary determination letter.

After considering the information developed during the inspection, the NRC has concluded that the finding is appropriately characterized as White, a finding of low to moderate safety significance.

The NRC has also determined that the failure to correct the degraded condition associated with the Division 3 SX pump is a violation of 10 CFR Part 50, Appendix B, Criterion XVI and technical specifications as cited in the enclosed Notice of Violation (Notice). The circumstances surrounding the violation were described in detail in Inspection Report No. 05000461/2017011. In accordance with the NRC Enforcement Policy, the Notice is considered escalated enforcement action because it is associated with a White finding.

The NRC has concluded that the information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in NRC Inspection Report No. 05000461/2017011. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position.

As a result of our review of Clinton Power Station's performance, including this White finding, we have assessed the Clinton Power Station to be in the Regulatory Response column of the NRC's Action Matrix, effective the fourth quarter of 2017. Therefore, we plan to conduct a supplemental inspection using Inspection Procedure 95001, "Supplemental Inspection Response To Action Matrix Column 2 Inputs," when your staff has notified us of your readiness for this inspection. This inspection procedure is conducted to provide assurance that the root cause and contributing cause of risk significant performance issues are understood, the extent of condition and the extent of cause are identified, and the corrective actions are sufficient to prevent recurrence.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

K. Steven West
Regional Administrator

Docket No. 050-00461
License No. NPF-62

Enclosure:
Notice of Violation

cc: Distribution via LISTSERV®

Letter to Bryan Hanson from K. Steven West dated February 22, 2018

SUBJECT: CLINTON POWER STATION - FINAL SIGNIFICANCE DETERMINATION OF A WHITE FINDING AND NOTICE OF VIOLATION; NRC INSPECTION REPORT NO. 05000461/2018091

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NOTICE OF VIOLATION

Exelon Generation Company, LLC
Clinton Power Station

Docket No. 050-00461
License No. NPF-62
EA-17-203

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted June 15 through December 28, 2017, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 of the *Code of Federal Regulations* (CFR) Part 50, Appendix B, Criterion XVI, "Corrective action," requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective materials and equipment, and nonconformance's are promptly identified and corrected.

Technical Specification (TS) Limiting Condition for Operability (LCO) 3.7.2 requires the Division 3 SX [shutdown service water] system be operable in modes 1, 2 and 3. Limiting Condition for Operation 3.7.2, Condition A states with division 3 SX inoperable, declare high pressure core spray inoperable immediately.

Technical Specification LCO 3.5.1 requires each ECCS injection/spray subsystem be operable in Mode 1, 2 and 3. LCO 3.5.1 Condition B.2 states if high pressure core spray system is inoperable restore HPCS system to operable in 14 days. LCO 3.5.1 Condition d states if the required action and associated completion time of Condition A, B, or C is not met, be in mode 3 in 12 hours.

Contrary to the above, from May 6, 2016 through June 15, 2017, the licensee failed to assure that a condition adverse to quality was corrected. Specifically, the licensee failed to correct a degraded condition identified during the evaluation performed as a result of the Division 3 SX pump failure in 2014. In January 2016, the licensee identified that corrosion of the Division 3 SX pump sleeves contributed to the pump's failure in 2014. The licensee did not consider the corrosion aspect when determining when the repair/replacement activities would occur, resulting in the failure of the SX pump to run on June 15, 2017, due to corrosion impacts. Therefore, the pump was inoperable at the conclusion of its surveillance run on March 15, 2017, and this condition did not reveal itself until the attempted pump start on June 15, 2017. This resulted in the pump being inoperable for approximately 92 days, a period greater than the allowed limiting condition for operation outage times provided in TS 3.7.2 and 3.5.1. Additionally, because the licensee was not aware of the pump's inoperability during the unit's operation cycle, the required actions of TS 3.7.2A.1, 3.5.1.B.2 and 3.5.1.D.1 were not met.

This violation is associated with a White finding.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Enclosure

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance was achieved is already adequately addressed on the docket in Inspection Report No. 05000461/2017011. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, EA-17-203," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region III, 2443 Warrenville Road, Lisle, IL 60532, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 22 day of February 2018