



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

April 6, 2020

Mr. Brian C. Hanson
Senior Vice President, Exelon Generation Company, LLC
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: R.E. GINNA NUCLEAR POWER PLANT, LLC – BIENNIAL PROBLEM
IDENTIFICATION AND RESOLUTION INSPECTION REPORT
05000244/2020012**

Dear Mr. Hanson:

On March 4, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your R.E. Ginna Nuclear Power Plant, LLC and discussed the results of this inspection with Mr. George Wrobel and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed the station's corrective action program and the station's implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for corrective action programs. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

The team also evaluated the station's processes for use of industry and NRC operating experience information and the effectiveness of the station's audits and self-assessments. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

Finally, the team reviewed the station's programs to establish and maintain a safety-conscious work environment and interviewed station personnel to evaluate the effectiveness of these programs. Based on the team's observations and the results of these interviews the team found no evidence of challenges to your organization's safety-conscious work environment. Your employees appeared willing to raise nuclear safety concerns through at least one of the several means available.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

X /RA/

Signed by: Erin E. Carfang
Erin E. Carfang, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Docket No. 05000244
License No. DPR-18

Enclosure:
As stated

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SUBJECT: R.E. GINNA NUCLEAR POWER PLANT, LLC – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT
05000244/2020012 DATED APRIL 6, 2020

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Number: 05000244

License Number: DPR-18

Report Number: 05000244/2020012

Enterprise Identifier: I-2020-012-0000

Licensee: Exelon Generation Company, LLC

Facility: R.E. Ginna Nuclear Power Plant, LLC

Location: Ontario, NY

Inspection Dates: February 10, 2020 to February 27, 2020

Inspectors: C. Lally, Senior Project Engineer
K. Hussar, Physical Security Inspector
J. Brand, Reactor Inspector
S. Monarque, Resident Inspector

Approved By: Erin E. Carfang, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a biennial problem identification and resolution inspection at R.E. Ginna Nuclear Power Plant, LLC, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – BASELINE

71152B - Problem Identification and Resolution

Biennial Team Inspection (IP Section 02.04) (1 Sample)

- (1) The inspectors performed a biennial assessment of the licensee's corrective action program (CAP), use of operating experience, self-assessments and audits, and safety conscious work environment.
 - Corrective Action Program Effectiveness: The inspectors assessed the corrective action program's effectiveness in identifying, prioritizing, evaluating, and correcting problems. The inspectors also conducted a five-year review of the following systems: 125 Volt DC, Service Water, Chemical Volume Control System, and the Reactor Protection System.
 - Operating Experience, Self-Assessments, and Audits: The inspectors assessed the effectiveness of the station's processes for use of operating experience, audits and self-assessments.
 - Safety Conscious Work Environment: The inspectors assessed the effectiveness of the station's programs to establish and maintain a safety-conscious work environment.

INSPECTION RESULTS

Assessment: Safety Conscious Work Environment	71152B
The team conducted individual and group interviews with 65 employees from a cross-section of the organization, including operations, maintenance, engineering, security, chemistry, and radiation protection. The team also interviewed the employee concerns program (ECP) manager, observed station ownership committee and management review committee meetings, and reviewed employee safety culture survey results.	
All individuals interviewed indicated that they would raise nuclear safety concerns and felt free to challenge actions or decisions that they believed were unsafe. Employees indicated that they had multiple avenues for raising concerns, felt that their management was receptive to receiving safety concerns and that concerns were generally addressed promptly. Employees also indicated they were aware of the station's Employee Concerns Program,	

stated they would use the program if necessary, and expressed confidence that their confidentiality would be maintained.

Based on the interviews, document reviews, and observations, the team concluded that an environment had been established and maintained where employees felt free to raise safety concerns without fear of retaliation. Further, the team determined that the processes in place to mitigate potential safety conscious work environment issues were adequately implemented.

Assessment: Corrective Action Program

71152B

Identification: The inspectors determined that Exelon generally identified issues and entered them into the corrective action program at a low threshold. During plant walk downs, there is evidence of continued focus to improve the look and condition of the plant, although the inspectors identified a few deficiencies not previously identified and captured in Exelon's corrective action program. Exelon entered each issue into their corrective action program and took actions to evaluate and address.

Prioritization and Evaluation: Based on the samples reviewed and observations, the inspectors determined that Exelon is adequate in prioritizing and evaluating issues commensurate with the safety significance of the identified problem. Exelon screened Incident Reports (IRs) for operability and reportability, categorized IRs by significance, and assigned actions to the appropriate department for evaluation and resolution.

Correcting Problems: The inspectors determined that the overall corrective action program performance related to resolving problems was effective. In most cases, Exelon implemented corrective actions to resolve problems in a timely manner.

Assessment: Operating Experience, Self-Assessments, and Audits

71152B

Use of Operating Experience: The team determined that Exelon appropriately evaluated industry operating experience for its relevance to the facility. Exelon appropriately incorporated both internal and external operating experience into plant procedures and processes, as well as lessons learned for training and pre-job briefs.

Self-Assessments and Audits: The team reviewed a sample of self-assessments and audits to assess whether Exelon was identifying and addressing performance trends. The team concluded that Exelon had a generally effective self-assessment and audit process.

Minor Violation: Untimely CAP Actions

71152B

Minor Violation: The inspectors determined that Exelon's failure to complete CAP actions in a timely manner prevented the station from performing required analysis and subsequent corrective actions is contrary to 10 CFR part 50, Appendix B, Criterion XVI, "Corrective Action" that was reasonably within Exelon's ability to foresee and correct and was therefore a performance deficiency. Specifically, multiple instances of corrective action assignments were extended over a period of years preventing their timely completion, including the following examples:

An issue was identified from a calculation update resulting in a higher calculated closed cooling water flow to the residual heat removal heat exchanger (IR 1952462). Exelon determined that an evaluation was necessary for a review of the updated system flow and, if required, an action to revise the Updated Final Safety Analysis

Report. This action was extended eight times over a period of eight years and not yet completed.

A second example, related to A and B Emergency Diesel Generator building wall cracks, was documented in IR 2617311. Exelon assigned an engineering evaluation to be performed to assess the status and trend of the identified cracks. The engineering evaluation was rescheduled five times over a four-year period and not yet completed.

A third example is IR 1960165, written in response to PWR Owner's Group letter OG-14-66, regarding the use of a vacuum refill of the reactor coolant system with the current pressure temperature curves in Ginna's Technical Specifications. While the Ginna procedure for vacuum refill was quarantined to prevent use, the outstanding action to revise the pressure-temperature limits and associated procedures has been extended ten times over a period of six years and not yet completed.

Screening: The inspectors determined the performance deficiency was minor. The failure to complete the corrective actions in a timely manner did not adversely affect any cornerstones objectives, did not lead to a more significant safety concern, and was not a precursor to a more significant event.

Enforcement: This failure to comply with 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On February 27, 2020, the inspectors presented the Biennial PI&R Team Inspection results to Mr. Daren Blankenship, Plant Manager and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152B	Corrective Action Documents	1938885,1952462, 1960165, 2440092, 2516547, 2617311, 2618563, 2697234, 2698012, 2703675, 2703675, 3979499, 4001599, 4010823, 4028605, 4074363, 4091346, 4090667, 4091175, 4091834, 4092150, 4093568, 4094730, 4094946, 4097619, 4098434, 4101510, 4102163, 4105396, 4146521, 4158151, 4161652, 4179976,		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		4183513, 4188285, 4213169, 4216625, 4213169, 4222052, 4231618, 4240825, 4241177, 4248074, 4257010, 4257652, 4258562, 4273835, 4275831, 4280904, 4293456, 4294181, 4294183, 4304452, 4315173, *4320018, *4320826, *4321747, *4321999, *4322003, *4322006 *IRs generated as a result of the inspection		
	Drawings	10905-0114		6
		10905-0405		8
		10905-0431		7

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		33013-1958		10
		33013-2095 sh. 3, 34		4
		33013-673 sh 1, 2		18, 15
	Engineering Evaluations	DA-MA-98-138		2
		DA-ME-98-139		2
	Procedures	CMP-10-03-ESW09A	American Standard, Model 1205, CP Heat Exchanger Maintenance for ESW09A	11
		ES-1.2	Post LOCA Cooldown and Depressurization	37
		ES-1.2	Background Information for Ginna Station Emergency Operating Procedure	14
		ES-1.3	Transfer to Cold Leg Recirculation	47
		ES-1.3	Background Information for Ginna Station Emergency Operating Procedure	27
		O-6.1	Equipment Operator Rounds and Log Sheets	93
	Work Orders	C93050414, C93636558, C93729888, C93640390, C93637443, C93625808, C93623753		