



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532-4352

March 12, 2021

Mr. David Rhoades  
Senior VP, Exelon Generation Company, LLC  
President and CNO, Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM  
IDENTIFICATION AND RESOLUTION INSPECTION AT CLINTON POWER  
STATION

Dear Mr. Rhoades:

This letter is to request information to support our scheduled Problem Identification and Resolution (PI&R) inspection beginning May 3, 2021, at the Clinton Power Station. This inspection will be performed in accordance with the NRC baseline Inspection Procedure 71152, "Problem Identification and Resolution."

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. The information requested prior to the inspection may be provided in either CD-ROM/DVD or other online access and should be ready for NRC review by April 16, 2021. Mr. Raymond Ng, 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 contact Mr. R. Ng at 630-829-9574 or [Raymond.Ng@nrc.gov](mailto:Raymond.Ng@nrc.gov).

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.

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 "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

***/RA by Nestor Feliz Adorno for/***

Kenneth Riemer, Chief  
Branch 1  
Division of Reactor Projects

Docket No. 50-461  
License No. NPF-62

Enclosure:  
Requested Information to Support PI&R  
Inspection

cc: Distribution via LISTSERV®

Letter to David Rhoades from Kenneth Riemer dated March 12, 2021.

SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM  
IDENTIFICATION AND RESOLUTION INSPECTION AT CLINTON POWER  
STATION

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## **REQUESTED INFORMATION TO SUPPORT PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION**

**Please provide the information on a compact disc (one for each of four team members), if possible. Unless otherwise specified, the time frame for requested information is for the period of April 2019, through the time the data request is answered. Please label any electronic files with file content information. In the case of list of condition reports requested, the list should be sortable electronically.**

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

### **(a) PROGRAM DOCUMENTS**

1. Copies of current administrative procedures associated with the CAP. This should include procedures related to: (1) corrective action process (including procedures on how to perform root and apparent cause evaluations); (2) operating experience program; (3) self-assessment program; (4) maintenance rule program; (5) operability determination process; (6) degraded/non-conforming condition process (e.g., RIS 2005-20); (7) system health process or equivalent equipment reliability improvement programs; and (8) operational decision making (ODMI) process.
2. A current copy of the Employee Concerns Program/Ombudsman administrative procedure(s).
3. Description of any substantive changes made to the CAP since the last Problem Identification and Resolution (PI&R) Inspection (May 2019). Please include the effective date with each listed change.

### **(b) ASSESSMENTS**

4. A copy of Quality Assurance (QA) audits of the CAP.
5. A copy of self-assessments and associated condition reports generated in preparation for this PI&R inspection.
6. A list of all other QA audits completed.
7. The schedule of future QA audits.
8. A copy of completed CAP self-assessments and the plan/schedule for future CAP self-assessments.
9. A chronological list of department and site self-assessments completed (include date completed and a brief description of the assessment).
10. A list of condition reports (CRs) written for findings or concerns identified in self-assessments and audits. Include a brief description/title of the finding, its status, and include a cross-reference to the audit or self-assessment number.

Enclosure

(c) CORRECTIVE ACTION DOCUMENTS

11. A copy of completed root cause evaluations generated since April 1, 2019. Provide status of any actions developed as part of the evaluations. Include a brief description/title, the date completed, significance/priority level, assigned organization, and system affected. Also include a reference, if not part of the root cause package, to the documents and/or CRs directing and tracking the actions.
12. A list of completed apparent cause evaluations generated since April 1, 2019. Provide status of any actions developed as part of the evaluations. Include a brief description/title, the date completed, significance/priority level, assigned organization, and system affected. Also include a reference, if not part of the apparent cause package, to the documents and/or CRs directing and tracking the actions.
13. A list of completed common cause evaluations generated since April 1, 2019. Provide status of any actions developed as part of the evaluations. Include a brief description/title, the date completed, significance/priority level, assigned organization, and system affected. Also include a reference, if not part of the common cause package, to the documents and/or CRs directing and tracking the actions.
14. A list of all open CRs at the time the data request is answered. Include CR number, a brief description/title, the date initiated, system affected if any, significance level, and anticipated completion date, if available.
15. A list of CRs that were closed since April 1, 2019. Include CR number, a brief description/title, the date initiated and closed, significance/priority level, assigned organization, system affected and whether there was an associated operability evaluation. This list should include all CRs that were opened any time before the data request is answered.
16. A list of open corrective actions at the time the data request is answered. Include CR number, a brief description/title, significance/priority level, initiating date and due date. The list should include the number of due date extensions and the responsible department.
17. A list of CRs generated by the corporate office that involve or affect plant operation. Include the date initiated, a brief description/title, site(s) affected, system affected, significance/priority level, assigned organization, and status (if closed, include date closed; if open, include scheduled date to be closed).
18. A list of completed effectiveness reviews with a brief description of the results. 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.
19. A list of CRs initiated for inadequate or ineffective corrective actions. Include the date initiated, a brief description/title, significance/priority 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.

20. A copy of any performance reports or indicators used to track CAP effectiveness. The end-of-quarter data will suffice; monthly reports are not required.
21. A data table (or similar format) showing the total number of CRs generated per year since 2015 sortable by department (i.e. operations, engineering, security etc.).
22. A data table showing the number of issues identified externally (NRC, INPO, other etc.) per year as compared to internally since 2015.

(d) TRENDS

23. A list of CRs initiated for trends. Include the date initiated, a brief description/title, significance/priority level, and status (if closed, include date closed; if open, include scheduled date to be closed).
24. Copies of any completed trend reports for CRs. Quarterly trend reports are acceptable; copies of all monthly reports are not required.
25. Copies of all apparent, common and/or root cause evaluations regarding adverse human performance trends.

(e) OPERATING EXPERIENCE

26. A copy of the most recent operating experience program effectiveness review.
27. 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).

(f) SYSTEMS AND COMPONENTS

28. A list of the top ten risk significant systems and top ten risk significant components.
29. A list of operability determinations/evaluations that were active during the period of April 2019, through the time the data request is answered. Include a brief description/title, date initiated, date closed or date scheduled to be closed.
30. Cause analysis, corrective actions documents, health reports, and trend analysis for systems and components considered Maintenance Rule (a)(1). Provide this information starting one year earlier from when the system or component entered (a)(1) status. Include dates when system/components entered (a)(1) status and, if applicable, returned to (a)(2) status. For recurring reports, quarterly reports are sufficient; monthly reports are not required.
31. A list of temporary modifications that were active during the period of April 2019, through the time the data request is answered. Include a brief description/title, installation date, and current status.

(g) SCWE

32. Results of completed safety culture/safety conscious work environment surveys or self-assessments since April 1, 2019. Include reference to associated CRs and status of the CRs actions. Also include schedule/plans for future surveys.

(h) REGULATORY ISSUES

33. A copy 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).

34. 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).

35. 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).

36. A list of degraded/non-conforming conditions. Include the CR number, brief description/title, significance/priority level, date initiated, and date closed or projected closeout date. Include open issues that were identified prior to April 1, 2019.

37. A list of current control room deficiencies and operator work-arounds, sortable by priority, with a brief description/title and corresponding CR and/or work order number.

(i) 5-YEAR REVIEW

38. A list of CRs and work orders (WOs) regarding the shutdown service water piping that have been generated since April 1, 2015. 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).

39. A list of CRs and WO's regarding the FLEX that have been generated since April 1, 2015. Include the CR/WO 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).

(j) ADMIN

40. A copy of the latest plant organizational chart and phone listing.

41. 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.

(k) Documents Requested to Be Available During the Inspection:

- a. Updated Safety Analysis Report;
- b. Technical Specifications and Technical Requirements Manual;
- c. Procedures and procedure index;
- d. A copy of the QA manual;
- e. A list of issues brought to the ECP/ombudsman and the actions taken for resolution;
- f. A list of the codes used in the CAP; and
- g. A copy of the latest independent/offsite organization review of safety culture/safety conscious work environment and internal equivalent assessments if not provided as part of the requested data package.

Other:

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