



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

January 20, 2022

Mr. David P. Rhoades
Senior Vice President
Exelon Generation Company, LLC
President & Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: R.E. GINNA NUCLEAR POWER PLANT, LLC – INTEGRATED INSPECTION
REPORT 05000244/2021004**

Dear Mr. Rhoades:

On December 31, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at R.E. Ginna Nuclear Power Plant, LLC. On January 18, 2022, the NRC inspectors discussed the results of this inspection with Mr. Paul Swift, Site Vice President and other members of your staff. The results of this inspection are documented in the enclosed report.

Three findings of very low safety significance (Green) are documented in this report. All of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC Resident Inspector at R.E. Ginna Nuclear Power Plant, LLC.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; and the NRC Resident Inspector at R.E. Ginna Nuclear Power Plant, LLC.

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,

Erin E. Carfang, Chief
Projects Branch 1
Division of Operating Reactor Safety

Docket No. 05000244
License No. DPR-18

Enclosure:
As stated

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

Docket Number: 05000244

License Number: DPR-18

Report Number: 05000244/2021004

Enterprise Identifier: I-2021-004-0036

Licensee: Exelon Generation Company, LLC

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

Location: Ontario, New York

Inspection Dates: October 1, 2021 to December 31, 2021

Inspectors: J. Schussler, Senior Resident Inspector
S. Monarque, Resident Inspector
E. Eve, Senior Reactor Inspector
S. Haney, Senior Project Engineer
M. Henrion, Health Physicist
K. Murphy, Operations Engineer
P. Ott, Operations Engineer
S. Veunephachan, Health Physicist

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

Enclosure

SUMMARY

The NRC continued monitoring the licensee’s performance by conducting an integrated 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

Procedure O-1A Actuation of Low Temperature Overpressure Protection System			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Barrier Integrity	Green NCV 05000244/2021004-01 Open/Closed	[H.5] - Work Management	71111.20
<p>A self-revealed Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion V was identified during the refueling outage on October 17, 2021, when Exelon failed to comply with Technical Procedure O-1A, “Filling and Venting the Reactor Coolant System,” Revision 028, which states, in part, with overpressure in-service, do not pressurize the reactor coolant system above 360 psig as indicated on PI-420. Specifically, while in Mode 5 during solid plant operations, with low temperature overpressure protection in-service, Exelon applied a tagout boundary necessary to implement work order C93763369. Exelon’s application of the tagout produced a containment isolation signal in accordance with plant design which resulted in the reactor coolant system pressure increasing until both pressure operated relief valves lifted consequently lowering the reactor coolant pressure.</p>			
Uncontrolled Loss of Reactor Coolant System Inventory During Reactor Coolant Pump Seal Injection Flange Disassembly			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000244/2021004-02 Open/Closed	[H.5] - Work Management	71111.20
<p>A self-revealed Green non-cited violation of Technical Specification 5.4.1 was identified when Exelon did not comply with a procedure specified in Regulatory Guide 1.33, “Quality Assurance Program Requirements (Operation),” Revision 2, February 1978, Section 9, Procedures for Performing Maintenance.” Specifically, Exelon failed to comply with Technical Procedure MMP-GM034-00001, “Reactor Coolant Pump Motor Minor Inspection, Removal, and Installation,” Revision 009, by not lowering the reactor coolant pump impeller on to the back seat before disconnecting the reactor coolant pump seal injection system. This resulted in an uncontrolled loss of inventory control which corresponded to a two-inch loss of reactor coolant system inventory in the reactor vessel over a 20-minute period on October 6, 2021, and thus required the control room operators to take action to restore the reactor coolant system level inventory.</p>			

Low-Low Steam Generator Water Level During Reactor Cooldown			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000244/2021004-03 Open/Closed	[H.4] - Teamwork	71111.20
<p>A self-revealed Green non-cited violation of Technical Specification 5.4.1.a, "Procedures," when Exelon failed to provide adequate written procedures as required by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, February 1978, Appendix A, Section 3, "Procedures for Startup, Operation, and Shutdown of Safety Related PWR Systems." Specifically, Exelon failed to adequately convey technical requirements into Procedure O-2.1, "Normal Shutdown to Hot Shutdown," Revision 153, which resulted in low-low 'A' steam generator water level less than 17 percent on October 4, 2021. The issue also resulted in the steam generator water level in the 'B' steam generator to fill high in band which also caused a reactor coolant system temperature reduction, over cooling event. Lastly, this event resulted in a valid auxiliary start signal which was subsequently reported to the NRC via Event Notification 55504, in accordance with 10 CFR Part 50.72(b)(3)(iv)(A).</p>			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
LER	05000244/2021001-00	LER 2021-001-00, Service Water Pump 'A' Declared Inoperable Due to Winding Failure Following Replacement Resulting in Violation of Technical Specifications LCO 3.7.8.A (One Service Water Pump Inoperable Greater than 14 Days)	71153	Closed

PLANT STATUS

Ginna began the inspection period in reactor plant coast down and, on October 3, 2021, the unit was taken offline for refueling outage 1GR43. The unit was synchronized to the grid on October 23, 2021, during power ascension, at 46 percent power, the unit experienced a turbine trip resulting in lowering of reactor power to approximately one percent. The unit was synchronized to the grid on October 24, 2021 and was returned to rated thermal power on October 31, 2021. On December 7, 2021, the unit was taken to 81 percent power to conduct planned repairs on a turbine control valve. The unit was returned to rated thermal power on December 8, 2021 and remained at or near rated thermal power for the remainder of the inspection period.

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 performed activities described in IMC 2515, Appendix D, "Plant Status," conducted routine reviews using IP 71152, "Problem Identification and Resolution," observed risk-significant activities, and completed on-site portions of IPs. 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.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of seasonal cold temperatures for the following systems on December 22, 2021:
 - Beyond design basis equipment storage building
 - Standby auxiliary feedwater pumps and water supply tank
 - 'A' and 'B' station batteries

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Residual heat removal shutdown cooling during reactor coolant system level at low inventory on October 8, 2021
- (2) Safety injection 'A' train inside containment during refueling outage on October 13, 2021

- (3) Safety injection 'B' train inside containment during refueling outage on October 13, 2021
- (4) Standby auxiliary feedwater 'D' train following associated train valve maintenance and surveillance testing on November 5, 2021
- (5) Standby auxiliary feedwater 'C' train following associated train valve maintenance and surveillance testing on November 12, 2021

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

- (1) The inspectors evaluated system configurations during a complete walkdown of the component cooling water system during refueling outage on October 12, 2021

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Containment upper level on October 9, 2021
- (2) Turbine building middle level on October 10, 2021
- (3) Turbine building basement on October 10, 2021
- (4) Containment middle level on October 11, 2021
- (5) Containment lower level on October 11, 2021

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (1 Sample)

The inspectors evaluated internal flooding mitigation protections in the:

- (1) Turbine building condenser pit and screen house circulating water bay flood level switches, main control room annunciators and corresponding circulating water pump trip criteria on December 17, 2021

71111.07A - Heat Sink Performance

Annual Review (IP Section 03.01) (2 Samples)

The inspectors evaluated readiness and performance of:

- (1) 'A' motor driven auxiliary feedwater lube oil cooler on December 2, 2021
- (2) 'D' containment recirculation fan cooling coil on December 15, 2021

71111.08P - In-service Inspection Activities (PWR)

PWR In-service Inspection Activities Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors verified that the reactor coolant system boundary, steam generator tubes, reactor vessel internals, risk-significant piping system boundaries, and

containment boundary are appropriately monitored for degradation and that repairs and replacements were appropriately fabricated, examined and accepted by reviewing the following activities from October 7 through October 13, 2021:

03.01.a - Nondestructive Examination and Welding Activities

- Ultrasonic examination of three chemical volume control system welds susceptible to thermal fatigue, GIN-I044100-RI, GIN-I043900-RI, GIN-I044000-RI (WO C93769049-190)
- Ultrasonic examination of the pressurizer lower shell-to-lower head circumferential weld, GIN-I004100 (WO C93778777-070)
- Visual (VT-1) examination of the reactor pressure vessel bottom mounted instrumentation penetrations, NDE Report No. BOP-VT-21-013 (WO C93757295-090)
- Visual (VT-3) examination of two supports on the residual heat removal system heat exchanger, GIN-I009200, GIN-I008000 (WO C93769049)
- Welding associated with weld overlay downstream of spent fuel pool heat exchanger service water outlet isolation valve, V-8689 (WO C93789376)

03.01.b - Pressurized-Water Reactor Vessel Upper Head Penetration Examination Activities

- Direct observation of bare metal visual examination of penetrations 20, 24, and 26. Document review of inspection results for all penetrations (WO C93757301-55)
- Engineering evaluation for acceptance of relevant indications found on penetration 35 (ESR-21-0210, Revision 000)

03.01.c – Pressurized-Water Reactor Boric Acid Corrosion Control Activities

- Boric acid corrosion evaluation on flange downstream of letdown valve, V-311D, AR 04450834
- Boric acid corrosion evaluation of packing glad leak on pressurizer spray valve, 431B, AR 04450830
- Boric acid corrosion evaluation of active leak on safety injection system valve, MOV-865, AR 04450598
- Boric acid identified on a chemical volume control system flange downstream of manual valve 388A, AR 04450868
- Boric acid identified on safety injection system valve, V-841, AR 04450637

03.01.d – Pressurized-Water Reactor Steam Generator Tube Examination Activities

- No steam generator tube inspections were performed in G1R43. Exelon received a one-time exception to the steam generator tube inspection requirements as documented in Technical Specification Amendment 145

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

Requalification Examination Results (IP Section 03.03) (1 Sample)

- (1) The inspectors reviewed and evaluated the licensed operator requalification exam results for the annual operating exam and biennial written exam on December 6, 2021.

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

- (1) The inspectors observed and evaluated the following licensed operator performance in the Control Room:
 - Plant shutdown and initial cooldown to Mode 3 on October 3, 2021
 - Reactor vessel and refueling cavity drain down level from 23 feet to 80 inches to facilitate installation of reactor vessel head on October 14–15, 2021
 - Main generator synchronization to the power grid on October 23, 2021

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated licensed operator performance in the simulator during licensed operator examinations on November 17, 2021. The examination involved a scenario that contained, but was not limited to, a loss of an instrument bus, elevated turbine vibrations, and a faulted steam generator.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (1 Sample)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components remain capable of performing their intended function:

- (1) Safety injection discharge to cold leg motor operated valve 878D maintenance, motor grease inspections, preventative, unplanned and planned maintenance activities on December 21, 2021

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Evaluation of refueling outage Protection Phase 1 shutdown risk, that began with Mode 4 entry, during the refueling outage on October 5, 2021
- (2) Evaluation of the installation of the equipment hatch, which reduced containment shutdown risk from yellow to green on October 6, 2021

- (3) Evaluation of refueling outage Protection Phase 2 shutdown risk, that began with lowered reactor coolant system inventory on October 8, 2021
- (4) Refueling outage heavy lift risk associated with the reactor vessel head lift from top of vessel to stand and reactor cavity flood on October 10, 2021
- (5) Evaluation of refueling outage Protection Phase 4 shutdown, reactor cavity drain down from 23 feet to 80 inches, that began on October 14, 2021, during the refueling outage on October 15, 2021

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (4 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Operability assessment of safety injection valve 878D operation as a result of borated water from refueling cavity leakage wetting the valve and operator on October 22, 2021
- (2) Atmospheric relief valve 3411, valve body internal thread engagement reduced from thread damage and the impact to mechanical joint integrity of the body to bonnet connection on October 25, 2021
- (3) 'A' emergency diesel generator loss of offsite power and safety injection load sequencer for 'D' containment recirculation fan 1A agastat relay 2/CF1A timer as found out of tolerance on December 6, 2021
- (4) 'A' emergency diesel generator loss of offsite power and safety injection load sequencer for 'A' motor driven auxiliary feedwater pump agastat relay 2/MAFP1A timer as found out of tolerance on December 6, 2021

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (8 Samples)

The inspectors evaluated the following post-maintenance test activities to verify system operability and functionality:

- (1) Operational testing of the 'A' safety injection train sequence timers following unplanned adjustment of the 'A' auxiliary feedwater pump and 'D' containment recirculation timers on October 15, 2021
- (2) Operation and adjustment of the atmospheric relief valve 3411 following planned valve overhaul including valve body stud replacement on October 25, 2021
- (3) Operational testing of safety injection system following planned replacement of safety injection flanges and relief valve 1817 on October 26, 2021
- (4) Operational testing of the containment spray system following planned replacement of containment spray flanges and relief valve 861 on October 26, 2021
- (5) System operation and testing following planned major valve overhaul, seat repairs and modification to packing glands of main steam check valve 3518 on October 26, 2021
- (6) System operation and testing following planned major valve overhaul, seat repairs and modification to packing glands of main steam check valve 3519 on October 26, 2021

- (7) Operational testing of pressure operated relief valve block valve motor operated valve 515 following planned stem replacement and overhaul on November 23, 2021
- (8) Operational testing of the 'A' emergency diesel generator and corresponding fuel oil day tank following unplanned maintenance to replace a pipe connection (WO C93774663) on December 20, 2021

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated refueling outage activities from October 3, 2021 through October 24, 2021

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (3 Samples)

- (1) STP-O-R-10.3, "Preparation and Performance of Main Steam Safety Valve Test Using Setpoint Verification Device (SPVD)" on October 2, 2021
- (2) STP-O-R-2.2-TR-A, "Diesel Generator Load and Safeguard Sequence Test-Train A" on October 5, 2021
- (3) STP-O-R-2.1-TR-A, "Safety Injection Functional Test-Train A" on October 18, 2021

Containment Isolation Valve Testing (IP Section 03.01) (1 Sample)

- (1) STP-O-23.22, "Local Leak Rate Test of RCDT Discharge Header Penetration 143" on October 11, 2021

RADIATION SAFETY

71124.01 - Radiological Hazard Assessment and Exposure Controls

Radiological Hazard Assessment (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated how the licensee identifies the magnitude and extent of radiation levels and the concentrations and quantities of radioactive materials and how the licensee assesses radiological hazards.

Instructions to Workers (IP Section 03.02) (1 Sample)

- (1) The inspectors reviewed the following:

Radiation Work Packages

- RWP 21-00521
- RWP 21-00642
- RWP 21-00801

Labeling of Containers

- Unit 1 Containment: 55-gallon drum containing lights on operating floor
- Unit 1 Containment: Operations box in basement
- Unit 1 Containment: Temporary power & lighting box on intermediate level
- Unit 1 Containment: 18 service water 55-gallon drums near equipment hatch on operating floor

Contamination and Radioactive Material Control (IP Section 03.03) (3 Samples)

The inspectors observed/evaluated the following licensee processes for monitoring and controlling contamination and radioactive material:

- (1) Observed workers exiting the radiological controlled area at Unit 1 during refueling outage
- (2) Observed surveying of potentially contaminated material leaving the radiological controlled area through small article monitors and frisking by hand
- (3) Observed workers donning and doffing before exiting radiological controlled area during refueling outage

Radiological Hazards Control and Work Coverage (IP Section 03.04) (5 Samples)

The inspectors evaluated in-plant radiological conditions during facility walkdowns and observation of radiological work activities. The inspectors also reviewed the following radiological work package for areas with airborne radioactivity:

- (1) RWP 21-01103
- (2) RWP 21-00507
- (3) RWP 21-00613
- (4) RWP 21-00505
- (5) RWP 21-00510

High Radiation Area and Very High Radiation Area Controls (IP Section 03.05) (5 Samples)

The inspectors evaluated licensee controls of the following High Radiation Areas and Very High Radiation Areas:

- (1) Unit 1 Containment: Locked high radiation area in basement for the fuel bundle transfer slot
- (2) Unit 1 Containment: Locked high radiation area in basement for regenerative heat exchanger
- (3) Unit 1 Auxiliary Building: High radiation area for demineralizer bed
- (4) Unit 1 Auxiliary Building: Locked high radiation area for spent fuel pool filter room
- (5) Unit 1 Auxiliary Building: High radiation area chemical volume control system holdup tank room

Radiation Worker Performance and Radiation Protection Technician Proficiency (IP Section 03.06) (1 Sample)

- (1) The inspectors evaluated radiation worker and radiation protection technician performance as it pertains to radiation protection requirements

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

OR01: Occupational Exposure Control Effectiveness Sample (IP Section 02.15) (1 Sample)

- (1) October 1, 2020 through September 30, 2021

PR01: Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual Radiological Effluent Occurrences (RETS/ODCM) Radiological Effluent Occurrences Sample (IP Section 02.16) (1 Sample)

- (1) October 1, 2020 through September 30, 2021

71152 - Problem Identification and Resolution (PI&R)

Semi-annual Trend Review (IP Section 02.02) (1 Sample)

- (1) The inspectors reviewed Exelon's corrective action program for potential adverse trends that might be indicative of a more significant safety issue on December 30, 2021

71153 - Follow Up of Events and Notices of Enforcement Discretion

Event Followup (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated four operational events of note during refueling outage G1R43 and licensee's response on October 25, 2021:
 - Low 'A' steam generator level results in auxiliary feedwater signal (EN 55504)
 - Reactor coolant system loss of inventory control
 - Reactor coolant system overfill loss of inventory control
 - Low temperature overpressure actuation during solid plant operations caused by containment isolation signal

Event Report (IP Section 03.02) (1 Sample)

The inspectors evaluated the following licensee event reports (LERs):

- (1) LER 05000244/2021-001-00, Service Water Pump 'A' Declared Inoperable Due to Winding Failure Following Replacement Resulting in Violation of Technical Specifications LCO 3.7.8.A (One Service Water Pump Inoperable Greater than 14 Days), ADAMS Accession No. ML21323A150. The inspectors previously reviewed the event associated with this LER as a focused IP 71152, Problem Identification and Resolution, inspection sample. The conclusion of that inspection and associated Severity Level IV Traditional Enforcement violation is documented under the Inspection Results section of Inspection Report 05000244/2021003, dated

November 4, 2021 (ADAMS Accession No. ML21306A225). Additionally, the inspectors completed a review of LER 2021-001-00 and did not identify any additional performance deficiencies. This LER is closed.

INSPECTION RESULTS

Procedure O-1A Actuation of Low Temperature Overpressure Protection System			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Barrier Integrity	Green NCV 05000244/2021004-01 Open/Closed	[H.5] - Work Management	71111.20
<p>A self-revealed Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion V was identified during the refueling outage on October 17, 2021, when Exelon failed to comply with Technical Procedure O-1A, "Filling and Venting the Reactor Coolant System," Revision 028, which states, in part, with overpressure in-service, do not pressurize the reactor coolant system above 360 psig as indicated on PI-420.</p> <p>Specifically, while in Mode 5 during solid plant operations, with low temperature overpressure protection in-service Exelon applied a tagout boundary necessary to implement work order C93763369. Exelon's application of the tagout produced a containment isolation signal in accordance with plant design which resulted in the reactor coolant system pressure increasing until both pressure operated relief valves lifted consequently lowering the reactor coolant pressure.</p> <p><u>Description:</u> On October 17, 2021, during the refueling outage, Exelon was operating the reactor plant in Mode 5 with the reactor coolant pressure at 344 psig and the pressurizer level at 100 percent. Exelon defines this operating status as solid plant operation and referred to it in work orders and procedures. Utilizing Technical Procedure O-1A, Exelon placed low temperature overpressure system in-service using Technical Procedure O-7, "Alignment and Operation of the Reactor Vessel Overpressure Protection System," as prescribed by Section 5.8 of O-1A. Exelon was performing a tagout prior to implementing work order C93763369, "Containment Isolation Relay Rack A1," to clean and inspect the relay rack A1. As a result of applying the tagout boundary, a containment isolation signal was received when breaker DCPDPCB04A/20, containment isolation relay rack A1, was opened. In accordance with plant design, opening this breaker caused a closure of chemical volume control system letdown valve 371. Consequently, reactor coolant system pressure increased until pressure operated relief valves 430 and 431 lifted at 410 psig and lowered the reactor coolant system pressure. The Updated Final Safety Analysis Report, Chapter 3, "Design of Structures, Components, Equipment, and System," Section 3.1.2.2.6 "General Design Criterion 15 – Reactor Coolant System Design," specifies the value of the pressure operated relief valve lift setting to be 410 psig.</p> <p>The inspectors noted that Exelon's application of a tag out caused a containment isolation which led to the actuation of the low temperature overpressure system resulting in lifting pressure relief valves. This system provides protection from pressure transients at low temperatures by limiting the pressure of such transients to below the limits set by 10 CFR Part 50, Appendix G, "Fracture Toughness Requirement." Specifically, Procedure O-1A, Section 4.4 states, in part, with overpressure in-service, do not pressurize the reactor coolant system above 360 psig as indicated on PI-420, "Reactor Coolant Loop Low Range Pressure." In its condition report AR 04453546, Exelon documented that during this event</p>			

the reactor coolant system was not in an unanalyzed condition for a low temperature overpressure transient limits derived from 10 CFR Part 50, Appendix G. Based on the information, the inspectors determined that Exelon did not follow the instructions in work order C93763369 and Technical Procedure O-1A. As a result, a containment isolation signal, an increase in reactor coolant system pressure, and an unplanned lifting of the reactor coolant system pressure operated relief valves occurred.

Corrective Actions: Exelon took immediate actions to restore plant configuration resulting from the containment isolation and reschedule the inspection work order. Additionally, Exelon generated a condition report to address the deficiency concerning an inadequate review of the tagout and containment isolation work while the low temperature overpressure was in-service. As part of the condition report, Exelon conducted a Human Performance Review Board and a Work Group Evaluation.

Corrective Action References: AR 04453546

Performance Assessment:

Performance Deficiency: Exelon failed to accomplish activities affecting quality in accordance with the instructions in work order C93763369 and Technical Procedure O-1A, which was a performance deficiency that was reasonably within Exelon's ability to foresee and correct and should have been prevented.

Screening: The inspectors determined this performance deficiency was more than minor because it was associated with the Human Performance attribute of the Barrier Integrity cornerstone and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Additionally, this issue is similar to Example 4.b of IMC 0612, Appendix E, "Examples of Minor issues," issued January 1, 2021, because Exelon's failure to follow procedure resulted in the lifting of the pressurizer pressure operated relief valves in order to reduce reactor coolant system pressure.

Significance: The inspectors assessed the significance of the finding using IMC 0609, Attachment 4, "Initial Characterization of Findings," dated December 20, 2019, annotating the Barrier Integrity cornerstone was affected by the isolation of the containment and subsequent isolation of the letdown resulting in the lifting of the pressure operated relief valves to prevent a pressurized thermal shock. Since the performance deficiency affected the Barrier Integrity cornerstone while the plant was shut down, the inspectors were directed to IMC 0609, Appendix G to assess the risk.

A Phase 1 screening was conducted using IMC 0609, Appendix G, Attachment 1, "Shutdown Operations Significance Determination Process Phase 1 Initial Screening and Characterization of Findings." The inspectors determined decay heat removal was the most affected key safety function for the deficiency and used Barrier Integrity Exhibit 4. The inspectors noted question 3 to be most applicable. Specifically, low temperature overpressure system was in-service as required by the plant operating mode, the low temperature overpressure setpoints were correct in accordance with plant design, the system was operable, and there was not an inadvertent safety injection. The screening resulted in the inspectors determining the finding screened to Green since all questions in Exhibit 4 were answered no.

Cross-Cutting Aspect: H.5 - Work Management: The organization implements a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. The work process includes the identification and management of risk commensurate to the work and the need for coordination with different groups or job activities. Exelon failed to effectively plan and execute containment isolation relay rack A1 inspection work by incorporating risk insights. Specifically, planning and executing work activities when operating the reactor in Mode 5 during solid plant operations with low temperature overpressure system in-service.

Enforcement:

Violation: 10 CFR Part 50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed documented instructions, or procedures, and shall be accomplished in accordance with these instructions or procedures.

Contrary to the above, on October 17, 2021, Exelon did not accomplish activities affecting quality in accordance with the instructions contained in work order C93763369 and Procedure O-1A, "Filling and Venting the Reactor Coolant System," Section 4.4, Revision 028, which resulted in the automatic actuation of the power operated valves due to a spike in reactor pressure.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Uncontrolled Loss of Reactor Coolant System Inventory During Reactor Coolant Pump Seal Injection Flange Disassembly

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000244/2021004-02 Open/Closed	[H.5] - Work Management	71111.20

A self-revealed Green non-cited violation of Technical Specification 5.4.1 was identified when Exelon did not comply with a procedure specified in Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, February 1978, Section 9, Procedures for Performing Maintenance." Specifically, Exelon failed to comply with Technical Procedure MMP-GM034-00001, "Reactor Coolant Pump Motor Minor Inspection, Removal, and Installation," Revision 009, by not lowering the reactor coolant pump impeller on to the back seat before disconnecting the reactor coolant pump seal injection system. This resulted in an uncontrolled loss of inventory control which corresponded to a two-inch loss of reactor coolant system inventory in the reactor vessel over a 20-minute period on October 6, 2021, and thus required the control room operators to take action to restore the reactor coolant system level inventory.

Description: On October 6, 2021, operating in mode 5 during a refueling outage, Exelon was in the process of performing work steps to replace the reactor coolant pump seal and motor. To accomplish this work Exelon completed disassembly steps, which included disconnecting the reactor coolant pump 'A' seal injection flange joint. Exelon performed activities in accordance with work order C9369018, which implemented Technical Procedure MMP-GM034-00001. Work order C93690138, Task 240, instructed Exelon to perform reactor coolant pump 'A' motor removal in accordance with Technical Procedure MMP-GM034-00001 and disconnect the 'A' reactor coolant pump seal injection flange and connect the drainage

reclamation system. Technical Procedure MMP-GM034-00001, steps 4.1.1 and 6.4.14, instructed Exelon to lower the pump impeller on to the back seat before disconnecting the seal injection flange joint.

Exelon observed the refueling outage schedule and work order C93690138 Task 243 and incorrectly concluded that work order C93690138 Task 240 and/or Technical Procedure MMP-GM034-00001, steps 4.1.1 and 6.4.14, had been completed, when in fact, the reactor coolant pump had not yet been placed on to the back seat. Exelon proceeded to disconnect the seal injection flange joint and reactor coolant system fluid flowed out the 'A' reactor coolant pump seal injection line for 20 minutes. This resulted an uncontrolled loss of reactor coolant system inventory, corresponding to a two-inch reduction reactor coolant system inventory in the reactor vessel level. The main control room operators observed the lowering of the reactor vessel level and responded by directing the reassembly of the seal injection flange, and local opening of motor operated valve 856 "Residual Heat Removal Pump Suction Valve from Refueling Water Storage Tank" to obtain makeup reactor coolant system water to the reactor vessel. Based on this information, the inspectors determined that Exelon did not follow Technical Procedure MMP-GM034-00001 and work order C93690138 to properly back seat the reactor coolant pump prior to disconnecting the seal injection system.

Corrective Actions: Exelon took immediate corrective actions to remake the seal injection flange joint and place the reactor coolant pump impeller on the backseat. Exelon also generated a condition report to address the deficiency in the work order that allowed tasks to be performed out of sequence. As part of the condition report, Exelon conducted a Human Performance Review Board and a Corrective Action program evaluation.

Corrective Action References: AR 04451289

Performance Assessment:

Performance Deficiency: Exelon not following Technical Procedure MMP-GM034-00001 and work order C93690138 to properly back seat the reactor coolant pump prior to disconnecting the seal injection system was a performance deficiency that was reasonably within their ability to foresee and correct, and which should have been prevented.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Human Performance attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Additionally, this issue is similar to Example 4.b of IMC 0612, Appendix E, "Examples of Minor issues," issued January 1, 2021, because Exelon's failure to follow procedure resulted in an uncontrolled loss of reactor coolant system inventory. The loss of inventory was arrested by reconnecting the reactor coolant pump seal injection flange joint and adding water to the reactor vessel from the refueling water storage tank through motor operated valve 856.

Significance: The inspectors assessed the significance of the finding using IMC 0609, Attachment 4, "Initial Characterization of Findings," dated December 20, 2019, Since the performance deficiency affected the Initiating Events cornerstone while the plant was shut down the inspectors were directed to IMC 0609, Appendix G to assess the risk.

A Phase 1 screening was conducted using IMC 0609, Appendix G, Attachment 1, "Shutdown Operations Significance Determination Process Phase 1 Initial Screening and

Characterization of Findings.” The inspectors determined inventory control was the most affected shutdown key safety function for the deficiency and used Exhibit 2 (Initiating Events) since it best reflects the dominant risk. The inspectors determined that since the refueling cavity was not flooded at the time of the deficiency a Phase 2 risk assessment is needed (Exhibit 2, Question 4) and a regional Senior Reactor Analyst (SRA) was consulted.

The inspectors and a regional SRA performed a Phase 2 assessment in accordance with IMC 0609, Appendix G, Attachment 2, “Phase 2 Significance Determination Process Template for PWR During Shutdown.” This finding was classified as a precursor, loss of reactor inventory initiating event issue. Also, since the point of leakage is above the elevation where it would not adversely impact residual heat removal, this would be considered a self-limiting loss of inventory event. The issue occurred during plant operating state 2 early in the decay heat time window (TW-E). Table 3 initiating event likelihood was estimated to be ‘4’ based on available reactor coolant system level indication and time to leak identification and isolation. Top event functions received full credit based on diverse injection capability, leak detection and isolation available time and available water inventory. Using Worksheet 6, the affected functions in the minimum cutsets were assessed and results counted using Table 9. The estimated risk significance of the inspection finding using Table 9 (steps 10, 13, and 16 equaling zero) results in the risk significance to be of very low safety (Green) with an estimated core damage frequency of less than 1E-6/year.

Cross-Cutting Aspect: H.5 - Work Management: The organization implements a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. The work process includes the identification and management of risk commensurate to the work and the need for coordination with different groups or job activities. Specifically, Exelon failed to effectively plan and execute work by incorporating the risks insights of operating a reactor plant in Mode 5.

Enforcement:

Violation: Technical Specification 5.4.1.a, “Procedures,” requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, “Quality Assurance Program Requirements,” Revision 2, Appendix A, February 1978. Regulatory Guide 1.33, Appendix A, Section 9(c), “Procedures for Performing Maintenance,” includes procedures for repair or replacement of major equipment that is expected to be repaired or replaced during the life of the plant. As such, Technical Procedure MMP-GM034-00001 is a quality assurance procedure in Regulatory Guide 1.33 and Exelon did not comply with Technical Specification 5.4.1.

Contrary to the above, on October 6, 2021, Exelon did not implement the criteria described in Technical Procedure MMP-GM034-00001 and work order C93690138 by not properly back seating the ‘A’ reactor coolant pump impeller before disconnecting the seal injection line flange.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Low-Low Steam Generator Water Level During Reactor Cooldown			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000244/2021004-03 Open/Closed	[H.4] - Teamwork	71111.20
<p>A self-revealed Green non-cited violation of Technical Specification 5.4.1.a, "Procedures," when Exelon failed to provide adequate written procedures as required by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, February 1978, Appendix A, Section 3, "Procedures for Startup, Operation, and Shutdown of Safety Related PWR Systems." Specifically, Exelon failed to adequately convey technical requirements into Procedure O-2.1, "Normal Shutdown to Hot Shutdown," Revision 153, which resulted in low-low 'A' steam generator water level less than 17 percent on October 4, 2021. The issue also resulted in the steam generator water level in the 'B' steam generator to fill high in band which also caused a reactor coolant system temperature reduction, over cooling event. Lastly, this event resulted in a valid auxiliary start signal which was subsequently reported to the NRC via event notification 55504, in accordance with 10 CFR Part 50.72(b)(3)(iv)(A).</p>			
<p><u>Description:</u> On October 4, 2021, Exelon was performing procedure steps in accordance with Procedure O-2.1, "Normal Shutdown to Hot Shutdown," Revision 153 as scheduled for the Ginna refueling outage G1R43. During the accomplishment of the procedure, Exelon identified that the 'B' feedwater regulating valve bypass valve AOV-4272 was not operating as expected in automatic. Therefore, operators placed the valve in manual control with a critical parameter set to control 'B' steam generator level at 52 percent, +/- 7 percent.</p> <p>Subsequently, during the reactor cooldown with the 'A' feedwater regulating valve closed automatically, as designed, the 'B' feedwater regulating valve did not close automatically because it was in manual control. The 'B' feedwater regulating valve in manual control resulted in the 'B' steam generator level rising to 63 percent, which was identified by the control room operators. Exelon took actions to secure feeding water to the 'B' steam generator from the main feedwater system and transition to auxiliary feedwater. As a result of the increased cool water in the 'B' steam generator, the reactor coolant system temperature started to decrease to the procedure limit of 535 degrees Fahrenheit until cold shutdown boron concentration is reached. To limit the reactor coolant system temperature, decreased auxiliary feedwater flow was minimized to both 'A' and 'B' steam generator. The reduction of auxiliary feedwater flow to both steam generators resulted in the 'A' steam generator level lowering below 17 percent. This resulted in one loop of reactor coolant system to be inoperable, in accordance with Technical Specification 3.4.5, condition A, for one reactor coolant system loop inoperable. The technical specification was met as Exelon proceeded with the reactor cooldown.</p> <p>During the event, due to high water levels in the 'B' steam generator, the control room operators recognized the reactor coolant system temperature and cooldown rate was approaching low temperature procedure limits. As a result, Exelon took additional actions in accordance with Procedure O-2.1 to shut the main steam isolation valve, which limits secondary side steam usage and heat removal from the reactor coolant system. This action stopped the reactor coolant system cooldown rate and created a reactor coolant system temperature increase trend to cold shutdown value of 547 degrees Fahrenheit. A subsequent analysis was completed by Exelon to determine the cooldown impact on the reactor coolant</p>			

system. Exelon concluded the impacts did not violate cold shutdown boron concentration values.

Based on the above information, the inspectors determined that Exelon failed to provide adequate written procedures for cooling down the reactor. Specifically, Exelon did not adequately convey technical requirements into Procedure O-2.1, "Normal Shutdown to Hot Shutdown," which resulted in low-low 'A' steam generator water level, a reactor coolant system temperature reduction, and a valid auxiliary feedwater start signal.

Corrective Actions: Exelon mitigated the consequences of the event by taking immediate procedural steps, restoring steam generator water levels and reactor coolant system temperature to within band. Exelon wrote a condition report to capture the deficiency which included assignments to conduct a Human Performance Review Board, performed a corrective action program evaluation, evaluation for maintenance rule actions, and reactor coolant system evaluation of shutdown margin.

Corrective Action References: AR 04450520

Performance Assessment:

Performance Deficiency: The inspectors determined that Exelon did not adequately ensure Procedure O-2.1, "Normal Shutdown to Hot Shutdown," Revision 153, was written to provide sufficient details to ensure proper steam generator level was maintained during reactor plant shutdown and transition from main feedwater to auxiliary feedwater. This represented a performance deficiency that was reasonably within Exelon's ability to foresee and correct, and which should have been prevented.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Procedure Quality attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, Exelon did not adequately communicate as a control room team the risk impacts, plant impact, and subsequently procedure activities during plant cooldown.

Significance: The inspectors assessed the significance of the finding using IMC 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated January 1, 2021. The inspectors performed a review of this finding using the guidance provided in IMC 0609, Appendix A, Exhibit 1, "Initiating Events Screening Questions," and determined this finding is of very low safety significance (Green) because it was not representative of a loss of coolant accident initiator, the event did not cause a reactor trip and a loss of mitigation equipment, support systems were available, the steam generator tubes were not impacted, and it did not adversely impact the external events initiators.

Cross-Cutting Aspect: H.4 - Teamwork: Individuals and work groups communicate and coordinate their activities within and across organizational boundaries to ensure nuclear safety is maintained. Specifically, Exelon did not adequately communicate as a control room team the risk impacts, plant impact and subsequently procedure activities as it pertained to plant cooldown.

Enforcement:

Violation: Technical Specification 5.4.1.a, "Procedures," requires in part, "Written procedures shall be established, implemented, and maintained covering the following activities: The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978." Regulatory Guide 1.33, Revision 2, Appendix A, Section 3.a, identifies "reactor coolant system", Section 3.k identifies "feedwater system", and Section 3.l identifies "auxiliary feedwater" as recommended procedures for startup, operation, and shutdown of safety-related PWR systems. Exelon procedure O-2.1, "Normal Shutdown to Hot Shutdown," Revision 153 implements this requirement.

Contrary to the above, from September 28, 2021 to October 9, 2021, Exelon did not maintain adequate written instructions. Specifically, Procedure O-2.1, "Normal Shutdown to Hot Shutdown," did not convey with sufficient technical detail instructions pertaining to the following systems: reactor coolant system, feedwater system, and auxiliary feedwater system. As a result, the 'A' steam generator water level was reduced below 17 percent, and the 'B' steam generator water level rose to 63 percent and contributed to a reactor coolant system temperature reduction.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Minor Performance Deficiency

71152

The inspectors reviewed Exelon's corrective action program and evaluated a sample of issues and events that occurred from June 2021 through December 2021 at Ginna to determine whether the issues were appropriately considered as emerging or adverse trends. The inspectors then verified whether the issues were appropriately evaluated by Exelon for potential trends and addressed within the scope of the corrective action program.

Using risk insights from the performance issues during the October 2021 refueling outage, the inspectors reviewed corrective action program documents associated with these events and Exelon's self-identification of adverse performance trends. Specifically, the events from the refueling outage were:

- Low 'A' steam generator level resulted in auxiliary feedwater signal (EN 55504)
- Reactor coolant system uncontrolled loss of inventory control
- Reactor coolant overflow uncontrolled loss of inventory control
- Low temperature overpressure actuation during solid plant operations caused by a containment isolation signal

The inspectors reviewed these issues for organizational, equipment, or human performance related potential trends and noted Exelon's self-identified performance issues relating to these events. Exelon captured adverse performance trends in the corrective action program as condition reports 04458908, 04453874, and 04460940. Specifically, the inspectors reviewed condition report 04458908 relating to maintenance performance, condition report 04453874 relating to operator fundamentals, and condition report 04460940 relating to leadership fundamentals. The inspectors evaluated the completed and planned corrective action documents to verify aspects of the adverse trends were addressed within Exelon's process. Additionally, the inspectors reviewed the performance attributes in Table 1 of IP 71152, to use as evaluating criteria the effectiveness of Exelon's corrective actions.

Based on the overall results of the semi-annual trend review, the inspectors determined that Exelon has identified trends during the 2021 refueling outage at Ginna. Exelon has completed or planned actions which appear to be sufficient to address the issues identified and are commensurate with the safety significance. The inspectors independently evaluated the deficiencies noted above for significance in accordance with the guidance in IMC 0612, Appendix B, "Issue Screening," and Appendix E, "Examples of Minor Issues." The inspectors determined three of the issues, which were bulleted above, were dispositioned separately and documented as more than minor performance deficiencies within this report. The fourth issue is documented as a minor performance deficiency below.

Minor Performance Deficiency: The inspectors identified a minor performance deficiency for Exelon's failure to follow procedure violation when the reactor vessel was overfilled. Specifically, Procedure O-2.3, "Draining the Reactor Coolant System to Lowered Inventory < 84 inches but >64 inches," states, in part, to maintain the reactor coolant between 64 and 84 inches, however Exelon exceeded 84 inches. Consequently, the reactor coolant system within the reactor vessel was overfilled.

Screening: The inspectors determined the performance deficiency was minor. This performance deficiency was corrected by the main control room staff and did not impact plant structures, systems, or components. This performance deficiency did not adversely affect the Reactor Oversight Process cornerstone objectives and was screened using IMC 0612, Appendix B, "Issue Screening," and Appendix E, "Examples of Minor Issues."

EXIT MEETINGS AND DEBRIEFS

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

- On October 14, 2021, the inspectors presented the In-service Inspection Activities inspection results to Mr. Paul Swift, Site Vice President and other members of the licensee staff.
- On October 15, 2021, the inspectors presented the Radiological Hazard Assessment and Exposure Controls inspection results to Mr. Paul Swift, Site Vice President and other members of the licensee staff.
- On January 18, 2022, the inspectors presented the integrated inspection results to Mr. Paul Swift, Site Vice President and other members of the licensee staff.

THIRD PARTY REVIEWS

Inspectors reviewed the March 2021 Institute on Nuclear Power Operations Plant Evaluation Report for R.E. Ginna Nuclear Power Plant.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Corrective Action Documents Resulting from Inspection	AR 04467102	Minor Oil Leak 'B' EDG TCV 5988 Flange Gasket, NRC Identified	12/16/2021
71111.06	Engineering Changes	ECP-21-0000049	Eliminate Circulating Water Pump Flood Trip in Screenhouse	Revision 000
		ECP-21-0000050	Revise flood switch trip circuit logic to eliminate single point vulnerability of DC fuses	Revision 000
71111.07A	Procedures		Service Water System Reliability Optimization Program (SWSROP)	Revision 015
	Work Orders	C93267492	CNMT Recirc Fan Cooling Coil 'D' – Open/Inspect for Fouling CMP-10-07-RECIRCFANA	5/12/2017
		C93495995	EAF02A - Replace heat Exchanger with one from Stock	04/11/2020
71111.08P	Miscellaneous	ER-GI-330-1001	R.E. Ginna Nuclear Power Plant ISI Program Document	Revision 1
71111.15	Engineering Changes	ESR-21-0206	Evaluation to Permanently Store Button Height Toolbox Inside Containment (G1R43)	000
71111.19	Procedures	STP-O-12.1	Emergency Diesel Generator 'A'	Revision 039
		STP-O-R-2.7A	Train 'A' Safety Injection Sequence Timers	Revision 005
	Work Orders	C93759668	Containment Spray Pump Suction Relief Valve 861	10/11/2021
		C93771361	Remove Relief Valve 1817 Cut Out and Replace Inlet Flange	10/29/2021
		C93774663	Emergency Diesel Generator 'A' Fuel Oil Header Replacement	12/16/2021
71111.20	Corrective Action Documents Resulting from Inspection	AR 04452772	"Hole in "C" (CRF) flexible (rubber) ducting"	10/18/2021
	Procedures	MMP-GM034-00001	Reactor Coolant Pump Motor Minor Inspection, Removal, and Installation	Revision 9
		O-1A	Filling and Venting the Reactor Coolant System	Revision 28
		O-2.1	Normal Shutdown to Hot Shutdown	Revision 153
	Work Orders	C93763369	G1R43, M-1306.2, (CLEANING & INSPECTION,) FOR CONTAINMENT ISOLATION RACKS	N/A
71111.22	Procedures	STP-O-R-10.3	Preparation for and Performance of Main Steam Safety Valve Test using Setpoint Verification Device	Revision 007

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		STP-O-R-2.1-TR-A	Safety Injection Functional Test-Train 'A'	Revision 002
		STP-O-R-2.2-TR-A	Diesel Generator Load and Safeguards Sequence Test-Train 'A'	Revision 002
71153	Miscellaneous	LER 2021-001-00	Service Water Pump 'A' Declared Inoperable due to Winding Failure Following Replacement Resulting in Violation of Technical Specifications LCO 3.7.8.A (One Service Water Pump Inoperable Greater than 14 Days)	Revision 00