

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 475 ALLENDALE RD, STE 102 KING OF PRUSSIA, PENNSYLVANIA 19406-1415

August 8, 2023

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 -

INTEGRATED INSPECTION REPORT 05000277/2023002 AND

05000278/2023002

Dear David Rhoades:

On June 30, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Peach Bottom Atomic Power Station, Units 2 and 3. On July 20, 2023, the NRC inspectors discussed the results of this inspection with David Henry, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

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 <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> 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,

Sarah H. Elkhiamy, Acting Chief Projects Branch 4 Division of Operating Reactor Safety

Docket Nos. 05000277 and 05000278 License Nos. DPR-44 and DPR-56

Enclosure: As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 -INTEGRATED INSPECTION REPORT 05000277/2023002 AND 05000278/2023002 DATED AUGUST 8, 2023

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DOCUMENT NAME: https://usnrc.sharepoint.com/teams/Region-I-Branch-4/Shared Documents/Inspection Reports/Peach Bottom/2023/Peach Bottom IR 2023002.docx

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DATE	8/4/2023	8/4/2023				

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# U.S. NUCLEAR REGULATORY COMMISSION Inspection Report

Docket Numbers: 05000277 and 05000278

License Numbers: DPR-44 and DPR-56

Report Numbers: 05000277/2023002 and 05000278/2023002

Enterprise Identifier: I-2023-002-0041

Licensee: Constellation Energy Generation, LLC

Facility: Peach Bottom Atomic Power Station, Units 2 and 3

Location: Delta, PA 17314

Inspection Dates: April 1, 2023 to June 30, 2023

Inspectors: S. Rutenkroger, Senior Resident Inspector

C. Dukehart, Resident Inspector B. Edwards, Senior Health Physicist M. Henrion, Senior Health Physicist N. Mentzer, Reactor Inspector

Approved By: Sarah H. Elkhiamy, Chief

Projects Branch 4

Division of Operating Reactor Safety

### **SUMMARY**

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Peach Bottom Atomic Power Station, Units 2 and 3, 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 <a href="https://www.nrc.gov/reactors/operating/oversight.html">https://www.nrc.gov/reactors/operating/oversight.html</a> for more information.

# **List of Findings and Violations**

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

**Additional Tracking Items** 

None.

### **PLANT STATUS**

Unit 2 began the inspection period at rated thermal power (RTP). On May 18, 2023, Unit 2 was down powered to 52 percent for planned maintenance and inspections, waterbox cleaning, main turbine valve exercising and testing, scram time testing, and a control rod pattern adjustment. The unit was returned to RTP the following day and remained at or near RTP for the remainder of the inspection period.

Unit 3 began the inspection period at RTP. On May 5, 2023, Unit 3 was down powered to 79 percent for a control rod pattern adjustment and was returned to RTP the following day. On May 29, 2023, Unit 3 was down powered to 79 percent for a control rod pattern adjustment and planned maintenance on hydraulic control units. The unit was returned to RTP the following day. On June 2, 2023, Unit 3 was down powered to 52 percent for planned maintenance and inspections, waterbox cleaning, main turbine valve exercising and testing, scram time testing, and a control rod sequence exchange. The unit was returned to RTP the following day. On June 5, 2023, Unit 3 was down powered to 69 percent for a follow-up control rod pattern adjustment and was returned to RTP the following day. On June 25, 2023, Unit 3 was down powered to 64 percent for a control rod pattern adjustment and restore hydraulic control units following planned maintenance. The unit was returned to RTP the following day and remained at or near RTP 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 <a href="http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html">http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html</a>. 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," 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**

#### 71111.04 - Equipment Alignment

# Partial Walkdown (IP Section 03.01) (2 Samples)

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

- (1) Unit 2, high-pressure coolant injection (HPCI) during reactor core isolation cooling (RCIC) maintenance on May 15, 2023
- (2) Unit common, 'E-2' emergency diesel generator (EDG) following full load test on June 7, 2023

#### <u>71111.05 - Fire Protection</u>

# Fire Area Walkdown and Inspection (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) Unit 3, reactor building elevation 195', PF-13K, on April 7, 2023
- (2) Unit 2, reactor building refuel floor, PF-57, on April 10, 2023
- (3) Unit 3, '3B' residual heat removal (RHR) room, PF-10, on May 3, 2023
- (4) Unit 3, reactor building elevation 195', PF-13K, on May 17, 2023
- (5) Unit 2, 'B' and 'D' core spray rooms, PF-5D, on June 27, 2023

# 71111.07A - Heat Exchanger/Sink Performance

# Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

(1) Unit common, 'E-4' EDG air coolant cooler cleaning and inspection on May 22, 2023

# 71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

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

(1) The inspectors observed and evaluated licensed operator performance in the control room during the operator response to an issue with the Unit 2, #3 turbine control valve, on April 25, 2023

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

(1) The inspectors observed and evaluated licensed operator requalification training in the simulator on May 8, 2023

# 71111.12 - Maintenance Effectiveness

## Maintenance Effectiveness (IP Section 03.01) (4 Samples)

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

- (1) Unit common, emergency service water system through April 5, 2023
- (2) Unit 2, suppression pool temperature monitoring system 'TE-2-02-071A2' through April 14, 2023
- (3) Unit 2, alternating current (AC) and direct current (DC) distribution system through May 30, 2023
- (4) Unit 3, AC and DC distribution system through May 30, 2023

# Quality Control (IP Section 03.02) (1 Sample)

The inspectors evaluated the effectiveness of maintenance and quality control activities to ensure the following SSC remains capable of performing its intended function:

(1) Unit common, station blackout (SBO) cable replacement on May 2, 2023

# 71111.13 - Maintenance Risk Assessments and Emergent Work Control

# Risk Assessment and Management (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) Unit 3, 'C' standby gas treatment fan planned maintenance on April 10, 2023
- (2) Unit 3, '3A' RHR system outage window on April 17, 2023
- (3) Unit 2, risk-informed completion time implementation for defeating reactor protection system channel associated with turbine control valve #3 closure for more than 12 hours on April 25, 2023
- (4) Unit common, 'E-4' EDG air coolant cooler cleaning and inspection on May 22, 2023
- (5) Unit common, 'E-3' EDG planned maintenance outage on June 14, 2023

# 71111.15 - Operability Determinations and Functionality Assessments

# Operability Determination or Functionality Assessment (IP Section 03.01) (10 Samples)

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

- (1) Unit 2, torus water temperature element '071A2' failed upscale on April 7, 2023
- (2) Unit 3, 'H' wide-range neutron monitor reading erratic on April 20, 2023
- (3) Unit common, 'E-1' EDG slight lube oil leak from the threaded pipe connection to temperature switch 'TS-0587A' on May 3, 2023
- (4) Unit 2 and Unit 3, digital electrohydraulic control (DEHC) system human machine interface (HMI) module lost connection to host server on April 16, 2023
- (5) Unit 2, closure of main turbine control valve #3 and installation of jumpers to defeat the associated reactor protection system half scram condition on April 25, 2023
- (6) Unit 2, loss of DEHC HMI following Drop 213 malfunction on May 11, 2023
- (7) Unit 3, HPCI oil filter inlet pressure was low during the pre-start check on May 27, 2023
- (8) Unit common, fire door inspection failures on June 12, 2023
- (9) Unit common, 'E-3' EDG lubricating oil temperature control valve not regulating oil temperature properly on June 20, 2023
- (10) Unit common, circuit breaker '65' trip due to lightning strike on June 27, 2023

### 71111.24 - Testing and Maintenance of Equipment Important to Risk

The inspectors evaluated the following testing and maintenance activities to verify system operability and/or functionality:

# Post-Maintenance Testing (IP Section 03.01) (6 Samples)

- (1) Unit 3, '3A' high-pressure service water discharge check valve testing following packing replacement on April 17, 2023
- (2) Unit 2, #2 turbine control valve testing following remaking wired connection on May 19, 2023
- (3) Unit 2, main condenser waterboxes 'A1' and 'B1' leak testing following cleaning on May 19, 2023
- (4) Unit 2, main condenser waterboxes 'B2' and 'C2' leak testing following cleaning on May 19, 2023
- (5) Unit 3, HPCI instrument power supply following capacitor replacements on May 30, 2023
- (6) Unit common, 'E-3' EDG lube oil temperature control valve testing following replacement on June 27, 2023

### Surveillance Testing (IP Section 03.01) (2 Samples)

- (1) Unit 3, RCIC alternative control panel test and remote shutdown panel test on June 1, 2023
- (2) Unit 2, HPCI inverter calibration on June 5, 2023

# In-service Testing (IP Section 03.01) (2 Samples)

- (1) Unit common, 'E-1' EDG slow start full load in-service test on May 3, 2023
- (2) Unit common, 'E-3' EDG fast start and full load test on May 16, 2023

### 71114.06 - Drill Evaluation

# Select Emergency Preparedness Drills and/or Training for Observation (IP Section 03.01) (1 Sample)

(1) The inspectors observed a full scope emergency preparedness drill conducted on May 9, 2023

### Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)

The inspectors evaluated:

(1) The inspectors observed an emergency preparedness drill conducted on April 18, 2023

#### RADIATION SAFETY

#### 71124.05 - Radiation Monitoring Instrumentation

# Walkdowns and Observations (IP Section 03.01) (8 Samples)

The inspectors evaluated the following radiation detection instrumentation during plant walkdowns:

(1) Hospital kit Ion chamber (Inventory #070621) located at radiation protection desk

- (2) Hospital kit hand frisker (Inventory #0017874) located at radiation protection desk
- (3) Continuous air monitor (CAM) (Inventory #334638) located at drywell entry level
- (4) CAM (inventory # 334570) located on the Unit 2 refuel floor
- (5) Area radiation monitors (ARM) 3-8 Unit 2 refuel floor
- (6) ARM 3-9 Unit 2 refuel floor
- (7) ARM 2-5 Unit 2 drywell entry level
- (8) Portable friskers (inventory #026305) emergency preparedness cabinet Pearl building

# Calibration and Testing Program (IP Section 03.02) (13 Samples)

The inspectors evaluated the calibration and testing of the following radiation detection instruments:

- (1) Ludlum 12-4 with roentgen equivalent man (REM) ball inventory # 0018510
- (2) Telepole (inventory # 076731)
- (3) Fastscan whole body counter
- (4) Argos-5AB (inventory #1107107)
- (5) Argos-5 (inventory #1107108)
- (6) Argos-5 (inventory #1312329)
- (7) PM-12 (inventory #13041272)
- (8) Eberline AMS-4 (inventory #334630)
- (9) GAST 0522-V103 (inventory #1379)
- (10) Ludlum 3030P (inventory #0011639)
- (11) Eberline RO-20 (inventory #0016548)
- (12) MGP BAK-2283 (inventory #0019518)
- (13) Eberline RO-20 (inventory #0019941)

#### Effluent Monitoring Calibration and Testing Program (IP Section 03.03) (2 Samples)

The inspectors evaluated the calibration and maintenance of the following radioactive effluent monitoring and measurement instrumentation:

- (1) Unit 2, stack effluent monitor that was evaluated
- (2) Unit 3, stack effluent monitor that was evaluated

#### **OTHER ACTIVITIES - BASELINE**

#### 71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

# BI01: Reactor Coolant System (RCS) Specific Activity (IP Section 02.10) (2 Samples)

- (1) Unit 2, April 1, 2022 to March 31, 2023
- (2) Unit 3, April 1, 2022 to March 31, 2023

# BI02: RCS Leak Rate (IP Section 02.11) (2 Samples)

- (1) Unit 2, April 1, 2022 to March 31, 2023
- (2) Unit 3, April 1, 2022 to March 31, 2023

# 71152A - Annual Follow-up Problem Identification and Resolution Annual Follow-up of Selected Issues (Section 03.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its corrective action program (CAP) related to the following issues:

(1) Unit common, trip of the SBO transformer feeder breaker on April 4, 2023 (the issue was entered into the CAP as IR 04667649)

# 71152S - Semi-annual Trend Problem Identification and Resolution

# Semi-annual Trend Review (Section 03.02) (1 Sample)

(1) The inspectors reviewed the licensee's CAP for potential adverse trends in the first and second quarters of 2023 that might be indicative of a more significant safety issue

#### 71153 - Follow-up of Events and Notices of Enforcement Discretion

### Personnel Performance (IP Section 03.03) (1 Sample)

(1) The inspectors reviewed personnel performance following oscillations of the Unit 2 turbine control valve #3 and subsequent half-scram actuations of the reactor protection system on April 25, 2023

# OTHER ACTIVITIES - TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

#### 60855 - Operation of An Independent Spent Fuel Storage Installation (ISFSI)

#### Operation of An ISFSI (1 Sample)

- (1) The inspectors evaluated the licensee's independent ISFSI cask loadings
  June 5 through 8, 2023. Specifically, the inspectors observed the following activities:
  - Fuel selection and fuel loading
  - Heavy load movement of the loaded multipurpose canister and HI-STORM
  - Drying and backfill evolutions
  - Closure welding and non-destructive weld evaluations
  - Transfer and transport evolutions
  - Radiological field surveys

#### **INSPECTION RESULTS**

	Observation: Unit Common, Trip of the SBO Transformer Feeder Breaker on April 4, 2023	71152A						
	The inspectors reviewed Constellation's corrective actions following the identification of degraded cables associated with the SBO line. Constellation identified that multiple SBO							
cables were degraded following the trip of the SBO transformer feeder breaker on								

April 4, 2023, and the results from subsequent tan delta cable testing. The issue was entered into Constellation's CAP (AR 04667649).

Constellation performed diagnostic tan delta cable testing and replaced a number of degraded aluminum conductor cables with new copper conducted cables in May 2023. Following replacement, the new cables were evaluated using tan delta and partial discharge testing methods. Additionally, the degraded cables were shipped to a laboratory for further evaluation to determine the failure mechanism. Constellation determined the cables slowly degraded due to jacket damage that occurred during the installation process.

The inspectors discussed immediate corrective actions with Constellation staff, observed the installation of replacement cables, and verified proper installation procedures were followed to prevent installation damage. The inspectors also reviewed the engineering change document (EC 638897) and work order (WO 01537162). The inspectors did not identify any issues of concern with Constellation's actions to identify the cause of the cable failure and replace the failed cable.

Observation: Semi-annual Trend Review by Evaluating Potential Adverse Trends in the First and Second Quarters of 2022

71152S

The inspectors conducted a semi-annual trend review by evaluating sample issues that occurred in the first and second quarters of 2023. During the evaluation, the inspectors verified the issues identified were addressed within the scope of the CAP. The inspectors reviewed health reports and related databases for trends and considered prior issues while performing routine walkdowns and attending the plan of the day meetings. The inspectors did not identify any substantive adverse performance trends or repetitive equipment failures during this time that were not already identified by Constellation. Based on the overall results of the semi-annual trend review, the inspectors determined that Constellation had identified adverse trends at Peach Bottom Atomic Power Station before they could become more significant safety problems. The inspectors continue to monitor the CAP and maintenance effectiveness during routine inspection activities.

#### **EXIT MEETINGS AND DEBRIEFS**

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

- On April 13, 2023, the inspectors presented the IP 71124.05 Radiation Instrumentation Inspection results to Dave Henry, Site Vice President, and other members of the licensee staff.
- On June 29, 2023, the inspectors presented the ISFSI Loading Campaign Inspection results to Jeremy Searer, Maintenance Director and Acting Plant Manager, and other members of the licensee staff.
- On July 20, 2023, the inspectors presented the integrated inspection results to David Henry, Site Vice President, and other members of the licensee staff.

# **DOCUMENTS REVIEWED**

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
71111.04	Procedures	SO 52A.8.A	Diesel Generator Daily Shutdown Inspection	Revision 67
71111.05	Procedures	PF-10	Unit 3 Reactor Building, '3B 'RHR Pump and Heat Exchanger Room, Elevation 91'-6"/116'-0"	Revision 3
		PF-13K	Unit 3 Reactor Building, General Area, Elevation 195'	Revision 5
		PF-13K	Unit 3 Reactor Building; General Area, Elevation 195'	Revision 5
		PF-57	Unit 2, Reactor Building, Refuel Floor, Elevation 234'-0"	Revision 7
		PF-5D	Unit 2 Reactor Building, 2B & 2D Core Spray Room, Elevation 91'6"	Revision 3
71111.07A	Work Orders	05271535		
71111.11Q	Corrective Action Documents	Issue Report (IR) 04672846		
71111.13	Corrective Action Documents Resulting from Inspection	*IR 4674847		
	Miscellaneous	RICT Record	LCOTR 2-TS-23-0012	Revision 0
		RICT Record	LCOTR 2-TS-23-0012	Revision 1
71111.15	Corrective Action Documents	04668388 04670445 04671151 04670445 04671151 04671603 04672846 04675348 04677248 04680971 04681903 04681935 04681982		

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
		04681985		
		04682049		
		04685642		
		04687100	D.C. J. C. DDO II ICO	
	Procedures	AO 60F.2-2	Defeat of an RPS Half Scram	Revision 7
		AO 60F.2-2	Defeat of an RPS Half Scram	Revision 7
		AO 60F.2-2	Defeat of an RPS Half Scram	Revision 7
		SO 94F.1.A-2	Unit 2 Suppression Pool Temperature Monitoring System Operation	Revision 9
		ST-M-037-350-2	Safety-Related Door Inspection	Revision 10
	Work Orders	05313638		
71111.24	Corrective Action	4678591		
	Documents	4505933		
		4678586		
		IR		
		04685642		
	Procedures	ST-O-013-201-3	RCIC Alternative Control Panel Test, and Remote Shutdown Panel Test	Revision 10
		ST-O-052-201-2	'E-1' Diesel Generator Slow Start and Full Load Test	Revision 23
		ST-O-052-413-2	'E-3' Diesel Generator Fast Start and Full Load Test	Revision 26
	Work Orders	04254309		
		05040681		
		05332157		
		05181680		
		05197537		
		05302882		
		05312239		
		05358034		
		05332157		
		05126807		
		05354651		

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
Troccdure		05377212		Date
71114.06	Corrective Action	04671567		
7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Documents	04671568		
	Boodinonio	04671610		
		04671624		
		04671629		
		04673079		
		04673348		
		04673352		
		04677035		
		04677057		
		04677145		
		04677148		
		04677151		
		04677162		
		04677314		
71153	Corrective Action	04672846		
	Documents			
	Procedures	AO 1D.8-2	Closing and Restoring a Main Turbine Control Valve	Revision 3
		AO 2A.14-2	EOC-RPT Bypassing	Revision 0
		AO 60F.2-2	Defeat of an RPS Half Scram	Revision 7
		ARC-205	Minor Trouble Turbine Control	Revision 3
		20C208L A-4		