



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

August 19, 2024

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: R. E. GINNA NUCLEAR POWER PLANT – BIENNIAL PROBLEM
IDENTIFICATION AND RESOLUTION INSPECTION REPORT
05000244/2024010

Dear David Rhoades:

On August 1, 2024, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your R. E. Ginna Nuclear Power Plant, and discussed the results of this inspection with Daren Blankenship, Site Vice President and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed the station's problem identification and resolution program to confirm that the station was complying with NRC regulations and licensee standards. Based on the samples reviewed, the team determined that your program complies with NRC regulations and applicable industry standards such that the Reactor Oversight Process can continue to be implemented.

The team also evaluated the station's effectiveness in identifying, prioritizing, evaluating, and correcting problems, reviewed licensee audits and self-assessments, and its use of industry and NRC operating experience information. The results of these evaluations are in the enclosure.

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

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

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

Sincerely,

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

Docket No. 05000244
License No. DPR-18

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000244/2024010 DATED AUGUST 19, 2024

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

Docket Number: 05000244

License Number: DPR-18

Report Number: 05000244/2024010

Enterprise Identifier: I-2024-010-0004

Licensee: Constellation Energy Generation, LLC

Facility: R. E. Ginna Nuclear Power Plant

Location: Ontario, NY

Inspection Dates: July 15, 2024 to August 1, 2024

Inspectors: E. Bousquet, Resident Inspector
E. Eve, Senior Project Engineer
S. Flanagan, Project Engineer
D. Merzke, Senior Reactor Operations Engineer

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

Enclosure

SUMMARY

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

List of Findings and Violations

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

Additional Tracking Items

None.

INSPECTION SCOPES

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

OTHER ACTIVITIES – BASELINE

71152B - Problem Identification and Resolution

Biennial Team Inspection (IP Section 03.04)

The inspectors performed a biennial assessment of the effectiveness of the licensee's problem identification and resolution program, use of operating experience, self-assessments and audits, and safety-conscious work environment.

- **Problem Identification and Resolution Effectiveness:** The inspectors assessed the effectiveness of the licensee's problem identification and resolution program in identifying, prioritizing, evaluating, and correcting problems. The inspectors also conducted a five-year review of the service water system. The corrective actions for the following non-cited violations (NCVs) and licensee event reports (LERs) were evaluated as part of the assessment: NCV 244/2022004-01, NCV 244/2022012-01, NCV 244/2023402-01, NCV 244/2023002-01, NCV 244/2023004-02, FIN 2023004-01, NCV 244/2024011-01, LER 244/2023-001, LER 244/2023-002, and LER 244/2023-003.
- **Operating Experience:** The inspectors assessed the effectiveness of the licensee's processes for use of operating experience.
- **Self-Assessments and Audits:** The inspectors assessed the effectiveness of the licensee's identification and correction of problems identified through audits and self-assessments.
- **Safety-Conscious Work Environment:** The inspectors assessed the effectiveness of the station's programs to establish and maintain a safety-conscious work environment.

INSPECTION RESULTS

Assessment	71152B
Problem Identification and Resolution Program Effectiveness:	
The inspectors determined that Constellation's problem identification and resolution program for Ginna was generally effective and adequately supported nuclear safety and security.	

Identification: The inspectors reviewed a sample of issues that have been processed through Constellation's problem identification and resolution program since the last biennial team inspection, including NCVs of regulatory requirements and other documented findings. The inspectors determined that, in general, the station identified issues and entered them into the corrective action program at a low threshold and timely manner.

Prioritization and Evaluation: Based on the samples reviewed, the inspectors determined that Constellation was effective at prioritizing and evaluating issues commensurate with the safety significance of the identified problem. Inspectors observed that at station corrective action program meetings, issues were screened and prioritized at the appropriate level and that corrective actions were assigned to address the issues.

Corrective Action: The inspectors determined that Constellation was effective in developing corrective actions that were appropriately focused to correct the identified problems.

Assessment	71152B
Operating Experience:	
The inspectors reviewed operating experience captured in the corrective action program and sampled operating experience from NRC, industry, vendors, and third-party groups. Overall, for the samples selected, the inspectors determined that Constellation was performing the appropriate assessments for station applicability.	

Assessment	71152B
Self-Assessment and Audits:	
The inspectors determined that Constellation was adequately performing self-assessments and audits in accordance with licensee procedures and implementing corrective actions as needed.	

Assessment	71152B
Safety-Conscious Work Environment:	
The inspectors interviewed a total of 25 individuals in one-on-one interviews. The purpose of these interviews was (1) to evaluate the willingness of Constellation staff to raise nuclear safety issues, (2) to evaluate the perceived effectiveness of the corrective action program at resolving identified problems, and (3) to evaluate Constellation's safety-conscious work environment. The personnel interviewed were randomly selected by the inspectors from Engineering, Maintenance, Operations, Radiation Protection, Chemistry, Emergency Preparedness, and Security. To supplement these discussions, the inspectors interviewed the Employee Concerns Program (ECP) Coordinator to assess their perception of the site employees' willingness to raise nuclear safety concerns, and also reviewed the ECP case log and select case files. All individuals interviewed indicated that they would raise safety concerns. All individuals felt that their management was receptive to receiving safety concerns and generally addressed them promptly, commensurate with the significance of the concern. Most interviewees indicated that they were adequately trained and proficient on initiating condition reports. Most interviewees were aware of the licensee's ECP, and all stated they would use the program if necessary and expressed confidence that their	

confidentially would be maintained if they brought issues to the ECP. The inspectors determined that the processes in place to mitigate potential safety culture issues were adequately implemented.

EXIT MEETINGS AND DEBRIEFS

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

- On August 1, 2024, the inspectors presented the biennial problem identification and resolution inspection results to Daren Blankenship, Site Vice President and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71152B	Corrective Action Documents	04394270		
		04677897		
		04689632		
		04709264		
		04724999		
	Corrective Action Documents Resulting from Inspection	04787351		
		04787668		
		04787710		
		04787932		
		04787947		
		04787981		
		04788002		
		04788006		
		04788033		
	04788038			
	Procedures	LS-AA-2001	Collecting and Reporting of NRC ROP Performance Indicator Data	Revision 17
		LS-AA-2090	Monthly Data Elements for NRC ROP Indicator - Reactor Coolant System (RCS) Specific Activity	Revision 5
		OP-AA-108-115	Operability Determinations	Revision 27
		OP-GI-108-115-1000	Ginna Operability Determination Guide	Revision 001
PI-AA-120		Issue Identification and Screening Process	Revision 13	
PI-AA-125		Corrective Action Program (CAP) Procedure	Revision 9	
PI-AA-125-1003		Corrective Action Program Evaluation Manual	Revision 7	