UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

July 24, 2025

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

SUBJECT: R.E. GINNA NUCLEAR POWER PLANT – INTEGRATED INSPECTION REPORT 05000244/2025002

Dear David Rhoades:

On June 30, 2025, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at R.E. Ginna Nuclear Power Plant. On July 15, 2025, the NRC inspectors discussed the results of this inspection with Richard Everett, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

One finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as a non-cited violation consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance or severity of the violation 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.

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,

SHERLYN HANEY

Digitally signed by SHERLYN HANEY
Date: 2025.07.24 13:50:55 -04'00'

Sherlyn Haney, Acting 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

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	05000244
License Number:	DPR-18
Report Number:	05000244/2025002
Enterprise Identifier:	I-2025-002-0045
Licensee:	Constellation Energy Generation, LLC
Facility:	R.E. Ginna Nuclear Power Plant
Location:	Ontario, New York
Inspection Dates:	April 1, 2025 to June 30, 2025
Inspectors:	C. Swisher, Senior Resident Inspector K. Poolman, Resident Inspector M. Fadden, Acting Resident Inspector M. Henrion, Senior Project Engineer K. Smetana, Reactor Engineer
Approved By:	Sherlyn Haney, Acting 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 an integrated 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

Failure to Promptly Correct a Condition Adverse to Quality Reduced the Reliability of Motor Operated Valve 860D			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000244/2025002-01 Open/Closed	None (NPP)	71152A
The inspectors identified a finding of very low safety significance (Green) and associated non-cited violation of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, Criterion XVI, "Corrective Action," when Constellation failed to establish measures to ensure a condition adverse to quality was promptly corrected. Specifically, a hydraulic locking phenomenon caused an overthrust of motor operated valve (MOV) 860D, containment spray pump 'B' discharge isolation valve, due to grease packing in the valve actuator spring pack. The valve actuator vendor previously issued communications regarding this phenomenon. Constellation failed to implement an available component modification within the valve motor of MOV 860D that would have prevented the overthrust condition.			

Additional Tracking Items

None.

PLANT STATUS

Ginna began the inspection period operating at 100 percent rated thermal power and remained at, or near, rated thermal power for the duration 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," 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 high temperatures and heat advisories of the systems in the following areas on June 18, 2025:
- Screenhouse
- Relay room
- Standby auxiliary feedwater annex

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (4 Samples)

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

(1) 'C' safety injection system on April 11, 2025
(2) 'A' component cooling water system on May 13, 2025
(3) Turbine driven auxiliary feedwater system on May 20, 2025
(4) 'B' containment spray system on June 2, 2025

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (7 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) Canister preparation building on April 29, 2025
(2) Screenhouse basement on May 12, 2025
(3) Turbine building middle level on May 12, 2025
(4) Standby auxiliary feedwater building on May 14, 2025
(5) Auxiliary building spent fuel pool area on May 14, 2025
(6) Auxiliary building intermediate level on May 16, 2025
(7) All volatile treatment room on May 27, 2025

Fire Brigade Drill Performance Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the on-site fire brigade training and performance during an unannounced fire drill on April 29, 2025.

71111.06 - Flood Protection Measures

Flooding Sample (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated internal flooding mitigation protections in the auxiliary building during seal replacement on four flood barrier doors on May 19, 2025.

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 licensed operator performance in the control room during 'C' standby auxiliary feedwater pump comprehensive testing on May 15, 2025.

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 training on May 20, 2025.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (3 Samples)

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

(1) 'A' charging pump system outage maintenance on April 24, 2025
(2) Spent fuel pool cooling pool skimmer maintenance on May 21, 2025
(3) 'A' and 'B' emergency diesel generator fuel oil transfer pump maintenance on June 2, 2025

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 plant risk (Green) during normal plant operations when reactor makeup water to boric acid blender flow control valve HCV-111 was unable to operate in automatic on April 7, 2025
(2) Evaluation of plant risk (Action Green) during planned maintenance of the 'B' component cooling water heat exchanger on April 22, 2025
(3) Evaluation of plant risk (Action Green) on the channel 2 nuclear instruments during planned calibrations at-power on April 24, 2025
(4) Evaluation of plant risk (Green) during planned maintenance of the 'B' motor driven auxiliary feedwater pump on April 30, 2025
(5) Evaluation of plant risk (Green) during planned maintenance of the offsite power circuit 767 on May 6, 2025

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (6 Samples)

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

(1) Functionality assessment of 'B' charging pump after identifying elevated leak-off on April 23, 2025
(2) Past operability assessment of MOV 896A, refueling water storage tank outlet isolation valve to containment spray and safety injection pumps, after a loss of remote operation capability on April 30, 2025
(3) Operability assessment of 'C' safety injection pump when dried boric acid was discovered on the suction relief valve on April 30, 2025
(4) Operability assessment of 'A' emergency diesel generator fuel oil transfer pump after identification of lower flow rate on May 2, 2025
(5) Operability assessment of the turbine driven auxiliary feedwater pump when the pump tripped on low bearing oil pressure above the required setpoint on May 2, 2025
(6) Operability assessment of 'B', 'C', and 'D' service water pumps following discovery of degraded wiring in the 'A' service water pump on June 26, 2025

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following temporary or permanent modifications:

(1) ECP-25-000215, Temporary modification to defeat flow indicator 609, component cooling water return flow from 'A' reactor coolant pump, input into the main control board on April 22, 2025

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) (7 Samples)

(1) Operability testing of the 'A' component cooling water heat exchanger following planned maintenance and replacement of service water relief valve on April 9, 2025
(2) Operability testing of the 'B' motor driven auxiliary feedwater pump following planned maintenance on April 30, 2025
(3) Operability testing of the 'B' service water pump following replacement of pump motor on May 5, 2025
(4) Operability testing of 'A' diesel driven flexible coping strategies air compressor following planned maintenance on May 21, 2025
(5) Operability testing of the trip throttle valve for the turbine driven auxiliary feedwater pump following repair of low lube oil pressure trip switch on May 27, 2025
(6) Operability testing of the turbine driven auxiliary feedwater pump following planned maintenance on May 28, 2025
(7) Operability testing of the 'B' safety injection pump following planned maintenance on June 17, 2025

Surveillance Testing (IP Section 03.01) (3 Samples)

(1) STP-O-12.2, "Emergency Diesel Generator B - Monthly Requirements," on April 4, 2025
(2) STP-O-3QB, "Containment Spray Pump B Quarterly Test," on April 30, 2025
(3) STP-O-36-COMP-, "Standby Auxiliary Feedwater Pump C - Comprehensive Test," on May 15, 2025

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

(1) STP-O-2.5.7B, "Emergency Diesel Generator Air Operated Valves, Quarterly Surveillance for B Train Valves," on April 21, 2025
(2) STP-O-36Q-D, "Standby Auxiliary Feedwater Pump D – Quarterly," on April 29, 2025

Diverse and Flexible Coping Strategies (FLEX) Testing (IP Section 03.02) (1 Sample)

(1) STP-O-40.2, "Diesel Driven FLEX Generator KBD01A (100KW) Quarterly/Annual Load Bank Test," on May 10, 2025

71114.02 - Alert and Notification System Testing

Inspection Review (IP Section 02.01-02.04) (1 Sample)

(1) The inspectors evaluated the licensee's maintenance and testing of the station alert and notification system for the period of October 2023 through March 2025.

71114.03 - Emergency Response Organization Staffing and Augmentation System

Inspection Review (IP Section 02.01-02.02) (1 Sample)

(1) The inspectors evaluated the readiness of the licensee's emergency preparedness organization for the period of October 2023 through March 2025.

71114.04 - Emergency Action Level and Emergency Plan Changes

Inspection Review (IP Section 02.01-02.03) (1 Sample)

(1) The inspectors evaluated the following submitted emergency action level and emergency plan changes:

- 23-05, Drill and Exercise EP-AA-122-300 Series
- 24-12, Alert and Notification System Modernization
- 24-37, Emergency Response Facility and Equipment Readiness (Indicator) 2024 Implementation
- 24-51, Standard Emergency Response Organization Clarification of Responsibilities
- 25-04, Emergency Response Organization Participation and Drill and Exercise Performance Indicator Guidance

This evaluation does not constitute NRC approval

71114.05 - Maintenance of Emergency Preparedness

Inspection Review (IP Section 02.01 - 02.11) (1 Sample)

(1) The inspectors evaluated maintenance of the emergency preparedness program for the period of October 2023 through March 2025.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

MS05: Safety System Functional Failures Sample (IP Section 02.04) (1 Sample)

(1) For the period April 1, 2024 through March 31, 2025

BI01: Reactor Coolant System Specific Activity Sample (IP Section 02.10) (1 Sample)

(1) For the period April 1, 2024 through March 31, 2025

BI02: Reactor Coolant System Leak Rate Sample (IP Section 02.11) (1 Sample)

(1) For the period April 1, 2024 through March 31, 2025

EP01: Drill/Exercise Performance Sample (IP Section 02.12) (1 Sample)

(1) For the period July 1, 2024 through March 31, 2025

EP02: Emergency Response Organization Drill Participation (IP Section 02.13) (1 Sample)

(1) For the period July 1, 2024 through March 31, 2025

EP04: Emergency Response Facility and Equipment Readiness (IP Section 02.14) (1 Sample)

This is a new NRC performance indicator, introduced in NEI 99-02, Revision 8 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24331A114). Licensees began collecting data for this performance indicator on January 1, 2025.

(1) For the period January 1, 2025 through March 31, 2025

71152A - Annual Follow-up Problem Identification and Resolution

Annual Follow-up of Selected Issues (Section 03.03) (2 Samples)

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

(1) Work group evaluation regarding a torque overthrust event on MOV 860D, 'B' containment spray pump discharge isolation valve on June 18, 2025
(2) Work group evaluation regarding degraded wiring found on 'A' service water pump motor on June 18, 2025

71152S - Semiannual Trend Problem Identification and Resolution

Semiannual Trend Review (Section 03.02) (1 Sample)

(1) The inspectors reviewed the licensee's corrective action program for potential emerging or adverse trends that might be indicative of a more significant safety issue on June 30, 2025.

INSPECTION RESULTS

Failure to Promptly Correct a Condition Adverse to Quality Reduced the Reliability of Motor Operated Valve 860D			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000244/2025002-01 Open/Closed	None (NPP)	71152A
The inspectors identified a finding of very low safety significance (Green) and associated non-cited violation of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, Criterion XVI, "Corrective Action," when Constellation failed to establish measures to ensure a condition adverse to quality was promptly corrected. Specifically, a hydraulic locking phenomenon caused an overthrust of motor operated valve (MOV) 860D, containment spray pump 'B' discharge isolation valve, due to grease packing in the valve actuator spring pack.			

The valve actuator vendor previously issued communications regarding this phenomenon. Constellation failed to implement an available component modification within the valve motor of MOV 860D that would have prevented the overthrust condition.

Description: On October 29, 2024, during scheduled diagnostic testing of MOV 860D, containment spray pump 'B' discharge isolation valve, the as-found thrust measurement exceeded the acceptance criteria. Constellation compared the as-found thrust measurement to DA-ME-98-124, "Weak Link Assessment MOV(s) 860 A/B/C/D," Revision 0, and determined that the MOV could be declared operable despite the overthrust event. MOV 860D has two safety-related functions; to open if excessive heat or pressure challenges the integrity of the reactor containment, and to shut to act as part of a containment isolation boundary.

Constellation identified the cause of the overthrust event as hydraulic locking. In this context, hydraulic locking can occur when lubrication grease migrates into the spring pack of the MOV until too much grease is present and the motor must exert more thrust for the valve to stroke. In more severe cases, industry operating experience and testing has demonstrated that such valves could be rendered unable to stroke. This method of hydraulic locking has been a known industry phenomenon since 1973. Limitorque, the valve vendor, performed extensive testing and determined that the condition could not be reproduced repeatedly or predictably. Limitorque issued maintenance bulletins to the industry to provide instructions for preventing the condition, most recently in Maintenance Bulletin MU 90-1, released in 1990. The solution was replacement of the original spring pack with one that had a relief path for the grease to prevent the grease from causing the hydraulic locking phenomenon.

In April 2015, an overthrust event on MOV 860B, containment spray pump 'A' discharge isolation valve, occurred due to this phenomenon of grease migration and hydraulic locking. At that time, Constellation determined that the modified spring pack, with the vendor recommended relief feature, had not been installed in MOV 860B with the updated design, but failed to perform an extent of condition to determine if this deficiency was in other valves and therefore did not recognize that MOV 860D also did not contain the modified spring pack.

Corrective Actions: Constellation removed the grease from the spring pack and initiated plans to replace the spring pack in the fall of 2025. Prior to the replacement, the valve is only expected to be stroked three times, minimizing the buildup of grease in the spring pack. The station performed an extent of condition review and identified six other safety-related MOVs that do not have the necessary spring pack modification, which are also planned for replacement.

Corrective Action References: ARs 04813289, 02493699

Performance Assessment:

Performance Deficiency: Constellation failed to promptly address the replacement of the MOV spring packs, a condition adverse to quality, rendering MOV 860D unreliable and potentially incapable of performing its safety-related functions.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Equipment Performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the lack of the modified spring pack challenged the

reliability of MOV 860D and could have prevented the valve's performance of its safety-related functions.

Significance: The inspectors assessed the significance of the finding using IMC 0609, Appendix A, “The Significance Determination Process for Findings At-Power.” The inspectors determined this finding to be of very low safety significance (Green) in accordance with Exhibit 2, because MOV 860D maintained its operability in this specific instance, although the deficiency affected the qualification and design of the component.

Cross-Cutting Aspect: Not Present Performance. No cross-cutting aspect was assigned to this finding because the inspectors determined the finding did not reflect present licensee performance.

Enforcement:

Violation: 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.

Contrary to the above, from April 2015 to October 2024, Constellation failed to ensure measures were established to assure a condition adverse to quality was promptly corrected prior to the overthrust event of MOV 860D on October 29, 2024.

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	71152A

Motor Operated Valve 860D Overthrust Event Inadequately Processed in Corrective Action Program

Minor Performance Deficiency: During diagnostic testing of MOV 860D, containment spray pump ‘B’ discharge isolation valve, the actuator exceeded the thrust acceptance criteria. MOV 860D has a safety function to open and to close. The overthrust event was identified to be caused by hydraulic locking of the MOV spring pack. Constellation documented the overthrust event in AR 04813289 and categorized it with a significance level of 4 (the lowest) and investigation class ‘D’ (which does not require a formal investigation) within the corrective action program. To resolve the issue, Constellation assigned only action tracking items, which are used to correct minor problems that do not represent conditions adverse to quality. Unlike action tracking items, corrective actions restore a condition adverse to quality.

Constellation procedure PI-AA-125, “Corrective Action Program (CAP) Procedure”, states that a corrective action “is necessary to restore a level 4 condition that directly impacts the quality of a basic structure, system, or component…”. The inspectors determined that the overthrust event on MOV 860D did impact the quality of the valve and motor.

Furthermore, the inspectors determined that classifying the action report as a significance level of 4 was a minor performance deficiency. Constellation procedure PI-AA-120, “Issue Identification and Screening Process,” attachment 2, provides examples of significance level 1, 2, and 3 issues. Example “yy” states, “degraded condition or non-conformance affecting the safety-related function of a structure, system, or component” as a significance level 3

example. The inspectors determined that since the overthrust event of MOV 860D affected the safety-related function of the valve to both open and close, this issue should have been screened as a significance level 3.

Screening: The inspectors determined the performance deficiency was minor. The inspectors evaluated the performance deficiency in accordance with the guidance in IMC 0612, Appendix B, “Issue Screening,” determined the issue was of minor significance because although Constellation inappropriately assigned only action tracking items and miscategorized the significance level, it did not cause any adverse consequences. Specifically, Constellation reached the appropriate conclusion to determine the cause of the overthrust and to fix the spring pack that caused the overthrust.

EXIT MEETINGS AND DEBRIEFS

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

- On April 10, 2025, the inspectors presented the emergency preparedness program inspection results to Richard Everett, Site Vice President, and other members of the licensee staff.
- On July 15, 2025, the inspectors presented the integrated inspection results to Richard Everett, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71114.02	Miscellaneous		R.E. Ginna Nuclear Power Plant Alert and Notification System Design Report	Revision 5
71114.04	Procedures	EP-AA-120-1001	10 CFR 50.54(q) Change Evaluation	Revision 11
71114.05	Miscellaneous	EP-AA-121	Emergency Response Facility (ERF) and Equipment Function Matrix	Revision 20
		EP-AA-121-F-12	Ginna Equipment Matrix	Revision 2
	Procedures	EP-AA-1000	Exelon Nuclear Standardized Radiological Emergency Plan	Revision 33
		EP-AA-1012	Exelon Nuclear Radiological Emergency Plan Annex for Ginna Station	Revision 8
	Self-Assessments	04747858	NOSA-GIN-24-02, Emergency Preparedness Audit Report	04/18/2024
		04775488	2024 NRC Emergency Preparedness Graded Exercise Inspection	08/19/2024
		04778241	2025 NRC Emergency Preparedness Program Inspection	04/07/2025
71152A	Calculations	DA-ME-98-124	Weak Link Assessment MOV(s) 860 A/B/C/D	Revision 0
	Corrective Action Documents	02493699	During Testing MOV 860B Potentially Experienced Overthrust	04/30/2015
		04813289	MOV 860D AF Thrust Exceeded Acceptance Criteria	10/29/2024
		04869375	Degraded insulation found on wires for PSW01A	05/29/2025
	Procedures	PI-AA-120	Issue Identification and Screening Process	Revision 13
		PI-AA-125	Corrective Action Program (CAP) Procedure	Revision 9
	Work Orders	93766829	Perform Service Water Pump A - Motor Swapout/Inspection	06/03/2021
		93807521	Perform Swap Out of Service Water Pump C Motor	02/16/2022
		93826185	Perform Swap Out of Service Water Pump 'B' Motor	09/19/2022
		93900373	Replace Service Water Pump Motor 'D' IAW ECP-23-000041	04/04/2024