

Peach Bottom 3 2Q/2013 Plant Inspection Findings

Initiating Events

Mitigating Systems

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Significance: N/A Mar 14, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Comply with a Posted High Radiation Area Boundary

Based on the evidence gathered during the OI investigation completed on March 14, 2013, the NRC concluded that on June 27, 2012, a Peach Bottom I&C technician deliberately failed to follow posted HRA requirements while crossing a HRA boundary during a Unit 3 High Pressure Coolant Injection (HPCI) system test. Specifically, the I&C technician crossed a posted HRA boundary and entered the Unit 3 HPCI room without a HRA briefing or the proper RWP. The I&C technician's actions caused Exelon to violate the PBAPS Unit 3 operating license. Specifically, Technical Specification 5.4.1 requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Appendix A, dated November 1972. Regulatory Guide 1.33, Appendix A, Section G dated November 1972, recommends procedures for control of radioactivity, including restrictions and activities in radiation areas (G.5.a), and RWPs (G.5.e). Exelon Procedure RP-AA-460, Revision 20, Section 4.3.2, requires, in part that a HRA briefing is required to enter a HRA.

The NRC considered that the significance of the underlying violation was minor because, while the I&C technician crossed a posted HRA boundary, the radiological conditions at the time did not actually constitute a HRA area in accordance with the regulatory definition of a HRA. However, the NRC decided to increase the significance of this violation to SL IV since it was deliberate and the NRC's regulatory program is based, in part, on licensees and their contractors acting with integrity. In accordance with Section 2.3.2 of the Enforcement Policy, and with the approval of the Director, Office of Enforcement, this issue has been characterized as a non-cited violation because: (1) Exelon placed the issue in its CAP (CR No. 1382220); (2) Exelon identified the issue and immediately conducted an investigation; (3) the violation was not repetitive as a result of inadequate corrective action; and, (4) although the violation was willful, (a) Exelon identified the violation, notified the NRC, and took significant corrective and

remedial actions; (b) the violation involved the acts of an individual who was not considered a licensee official with oversight of regulated activities as defined in the Enforcement Policy; and (c) the violation did not involve a lack of management oversight and was the result of the isolated action of the employee.

NCV 05000278/2013011-01, Failure to Comply with a Posted High Radiation Area Boundary

Inspection Report# : [2013011](#) (*pdf*)

Public Radiation Safety

Security

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

Significance: N/A May 24, 2013

Identified By: NRC

Item Type: FIN Finding

2013 Problem Identification and Resolution (PI&R) Inspection Summary

The inspectors concluded that Exelon was generally effective in identifying, evaluating, and resolving problems. Exelon personnel identified problems, entered them into the corrective action program at a low threshold, and in general, prioritized issues commensurate with their safety significance. Exelon appropriately screened issues for operability and reportability, and performed causal analyses that appropriately considered extent of condition, generic issues, and previous occurrences. The inspectors also determined that Exelon implemented corrective actions to address the problems identified in the corrective action program in a timely manner.

The inspectors concluded that Exelon adequately identified, reviewed, and applied relevant industry operating experience to Peach Bottom operations. In addition, based on those items selected for review, the inspectors determined that Exelon's self-assessments and audits were thorough.

Based on the interviews the inspectors conducted over the course of the inspection, observations of plant activities, and reviews of individual corrective action program and employee concerns program issues, the inspectors did not identify any indications that site personnel were unwilling to raise safety issues, nor did they identify any conditions that could have had a negative impact on the site's safety conscious work environment.

No findings were identified.

Inspection Report# : [2013008](#) (*pdf*)

Last modified : September 03, 2013