

## Oyster Creek 3Q/2013 Plant Inspection Findings

---

### Initiating Events

---

### Mitigating Systems

**Significance:**  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Degraded Emergency Diesel Generator Bypass Sight Glass not identified in the Corrective Action Program**

Green. The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," because Exelon did not promptly identify a condition adverse to quality. Specifically, from December 10, 2012 to April 4, 2013, Exelon did not identify that the fuel bypass sight glass on the #1 emergency diesel generator (EDG) was partially full. A partially full fuel bypass sight glass indicates that the bypass relief valve is degraded, challenging the operability of the emergency diesel generator because fuel could have bypassed the fuel injectors and therefore prevented the emergency diesel generator from being able to achieve full rated power. Exelon entered this issue into the corrective action program for resolution as issue report (IR) 1497683 and subsequently replaced a degraded relief valve in the bypass sight glass.

This finding is more than minor because it is associated with the design control attribute of the Mitigating Systems cornerstone and affected the cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the performance deficiency affected the reliability of an emergency diesel generator to perform its safety function during its mission time. This issue was also similar to Example 3j of NRC IMC 0612, Appendix E, "Examples of Minor Issues," because the condition resulted in reasonable doubt of the operability of the #1 emergency diesel generator and additional analysis was necessary to verify operability. The inspectors evaluated the finding using exhibit 2, "Mitigating System Screening Questions" in Appendix A to IMC 0609, "Significance Determination Process." The inspectors determined that this finding was a deficiency affecting the design or qualification of a mitigating SSC, where the SSC maintained its operability or functionality. Therefore, inspectors determined the finding to be of very low safety significance (Green). The finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because Exelon did not identify the issue associated with the degraded emergency diesel generator bypass sight glass in a timely manner on December 10, 2012 through April 4, 2013 when identified by NRC inspectors. [P.1 (a)]. (Section 1R15.1)

Inspection Report# : [2013003](#) (*pdf*)

**Significance:**  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Alarm Response Procedures did not implement Technical Specification Requirements**

The inspectors identified a Green NCV of technical specification 6.8.1a for improperly implementing technical specifications requirements into alarm response procedures for the 125 VDC (volts – direct current) system. The

inspectors determined that the improper implementation of technical specification requirements into alarm response procedures for the 125 VDC system is a performance deficiency that was within Exelon's ability to foresee and correct. Exelon entered this issue into the corrective action program for resolution as IR 1512551.

The inspectors determined this finding was more than minor because the finding affected the procedure quality attribute of the mitigating system cornerstone objective to ensure the reliability and capability of systems that respond to initiating events. The inspectors determined this finding was not a deficiency affecting the design or qualification of a mitigating SSC, did not represent a loss of system or function, did not represent an actual loss of function of at least a single train for greater than its technical specification allowed outage time, did not represent an actual loss of function of two separate safety systems for greater than its technical specification allowed outage time, and did not represent an actual loss of function of one or more non-technical specification trains of equipment designated as high safety-significant in accordance with Exelon's maintenance rule program for greater than 24 hours. Therefore, the inspectors determined the finding to be of very low safety significance (Green).

This finding has a cross-cutting aspect in the area of Human Performance, Resources, because Exelon did not ensure that procedures affecting nuclear safety were accurately maintained. Specifically, technical specifications requirements regarding the battery charger were not accurately reflected in the alarm response procedure. [H.2(c)] (Section 1R15.2)

Inspection Report# : [2013003](#) (*pdf*)

**Significance:**  Mar 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Emergency service water non-conformance not entered identified as a condition adverse to quality and not entered into corrective action program**

The inspectors identified a Green NCV of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," when Exelon did not promptly identify or correct a condition adverse to quality. The inspectors determined that failing to identify and enter a condition adverse to quality into the corrective action program is a performance deficiency that was within Exelon's ability to foresee and correct. Exelon entered this issue into the corrective action program for resolution as IR1481670. This finding is more than minor because it is associated with the design control attribute of the mitigating systems cornerstone and affected the cornerstone objective of "ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences." This issue was also similar to Example 3j of NRC IMC 0612, Appendix E, "Examples of Minor Issues," because the condition resulted in reasonable doubt of the operability of emergency service water system 2 and additional analysis was necessary to verify operability. The inspectors evaluated the finding using exhibit 2, "Mitigating System Screening Questions" in appendix A to inspection manual chapter 0609, "Significance Determination Process." The inspectors determined that this finding was a deficiency affecting the design or qualification of a mitigating SSC, where the SSC maintained its operability or functionality. Therefore, inspectors determined the finding to be of very low safety significance

This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because Exelon did not identify the issue associated with the non-conforming emergency service water expansion joint in a timely manner [P.1(a)]. (1R15)

Inspection Report# : [2013002](#) (*pdf*)

**Significance:**  Dec 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Follow Inspection and Torquing of Bolted Connection Procedure**

The inspectors identified a Green, non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” because Exelon did not properly implement procedural controls to ensure adequate thread engagement for standby liquid control (SLC) squib valve flanges. Specifically, SLC squib valve flanges were installed with inadequate thread engagement (stud was not flush with the nut), as required by Exelon’s maintenance procedures. Exelon’s corrective actions included declaring the system inoperable, entering the issue into the corrective action program (IR 1444861 and 1444862) and immediately replacing the existing bolts with bolts of an appropriate length such that projection through the nut was at least flush.

The performance deficiency was more than minor because if left uncorrected the inadequate thread engagement would have the potential to lead to a more significant safety concern. Specifically, Exelon’s evaluation stated that the SLC squib valve spool piece flanges would not have been able to perform their design function under all seismic conditions when the system was required to be operable. In consultation with the Region I senior reactor analyst, the inspectors reviewed this condition using IMC 0609, Attachment G, “Shutdown Operations Significance Determination Process.” As the condition occurred during the refueling outage and was identified and corrected before Exelon started up the Oyster Creek reactor, and only existed during the outage when SLC was not required to be operable (November 16 – 27, 2012), the issue screened to very low safety significance (Green). This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program because Exelon did not take appropriate corrective actions to address safety issues and adverse trends in a timely manner, commensurate with their safety significance and complexity. Specifically, Exelon did not take appropriate corrective actions, such as replacing bolts during the refueling outage with longer bolts, after the NRC identified a similar concern on the same SLC squib valve spool flanges in September 2012 (IR 1417726). (P.1(d)) (Section 1R15)

Inspection Report# : [2012005](#) (pdf)

## **Barrier Integrity**

**Significance:**  Dec 31, 2012

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **Inadequate Application of Strippable Coating to the Refueling Cavity Liner and the Failure to Configure a Valve in the Leakage Collection System Resulting in Increased Potential for Corrosion**

Green. A self-revealing NCV of 10 CFR 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” was identified because Exelon procedures and work orders were not effective in preventing refueling cavity leakage from overflowing onto the exterior surface of the drywell liner during the refueling outage (1R24) in November 2012. The performance deficiencies that contributed to the finding were inadequate oversight of the contractors applying a strippable coating to the reactor cavity liner and a valve configuration control error on a temporarily installed leakage collection system. Upon discovery, Exelon took immediate corrective actions to open the leakage collection system filter inlet valve and restore reactor cavity liner leakage flow to the reactor building equipment drain tank.

This finding is more than minor because, if left uncorrected, this condition would have the potential to lead to a more significant safety concern. Specifically, the continued wetting of the metallic drywell liner surface could provide an environment conducive to corrosion. This finding is not more than very low safety significance because the licensee performs periodic inspections of drywell liner and exterior surface coating to ensure that liner corrosion is monitored and controlled. The inspector completed the Phase 1 Initial Screening and Characterization of Findings, of Attachment 0609.04 of Inspection Manual Chapter (IMC) 0609, and screened the finding to Green, very low safety significance. This finding is not more than very low safety significance because the licensee performs periodic inspections of the

drywell liner and exterior surface coating to ensure that liner corrosion is monitored and controlled. Exelon has entered this condition into the corrective action process under IR 1440116. This finding has a cross cutting aspect in the area of Human Performance, Work Practices, H.4(c) for not ensuring supervisory and management oversight of work activities, including contractors and plant personnel, such that nuclear safety is supported regarding the application of the strippable coating on the reactor cavity liner. (H.4(c)) (Section 1R08)

Inspection Report# : [2012005](#) (*pdf*)

---

## **Emergency Preparedness**

---

## **Occupational Radiation Safety**

---

## **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**

Last modified : December 03, 2013