

## Peach Bottom 2 3Q/2013 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

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### Barrier Integrity

**Significance:** G Mar 31, 2013

Identified By: NRC

Item Type: FIN Finding

#### **Inadequate Operability Determination in Response to Power Load Unbalance Device Failure**

The inspectors identified a Green finding for PBAPS's failure to follow the operability determination (OD) process described in Procedure OP-AA-108-115, "Operability Determinations." Specifically, on February 24, 2013, between 6:15 a.m. and 10:30 a.m., an immediate determination of operability was not made in a timely manner, and was not initially documented in accordance with the corrective action process (CAP), following discovery that Unit 2 was operating outside of the analyzed limits specified in the core operating limits report (COLR) with the power load unbalance (PLU) circuit out of service (OOS). Consequently, operators entered the Unit 2 minimum critical power ratio (MCPR) technical specification limiting condition for operation (TS LCO) 3.2.2, Condition A, after exceeding the two-hour required action completion time. The inspectors determined that the immediate determination of operability was not performed in a matter commensurate with the safety significance of the two-hour LCO required action completion time. The inspectors determined that this was not a violation of TSs because subsequent analysis by a third party vendor determined that MCPR thermal limits were satisfied between 85 percent and 100 percent reactor power with the PLU circuit OOS on Unit 2.

This finding is more than minor because it is associated with the design control attribute of the barrier integrity cornerstone and adversely affected the cornerstone objective of providing reasonable assurance that the physical design barriers (fuel cladding) protect the public from radionuclide releases caused by events. Using IMC 0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings," and IMC 0609, Appendix A, "The SDP for Findings At-Power," the inspectors determined that this issue screened to Green, because it was associated only with the fuel cladding barrier. The inspectors determined that this finding had a cross-cutting aspect in the area of Human Performance, decision-making, because PBAPS did not use conservative assumptions in decision making and did not adopt a requirement to demonstrate that the proposed action was safe in order to proceed rather than a requirement to demonstrate that it is unsafe in order to disprove the action [H.1(b)]. (Section 1R13)

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

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### Emergency Preparedness

## Occupational Radiation Safety

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## Public Radiation Safety

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## 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.

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## 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*)

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