

Oyster Creek

4Q/2013 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Sep 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Physical Change To Security Feature Causes Flood Control Feature To Be Ineffective

The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," in that, Exelon did not ensure applicable regulatory requirements and design basis for the emergency diesel generators were correctly translated into instructions. The inspectors determined that Exelon did not ensure that the applicable regulatory requirements and design basis for flood control features were correctly translated into specifications, drawing, procedures and instructions for the installation of a security wall around the emergency diesel generator building which affected the probable maximum precipitation flood protection features of the building was 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 1546148. The performance deficiency was more than minor because the finding affected the protection against external factors attribute of the mitigating systems cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors determined this finding did involve the loss or degradation of equipment or function specifically designed to mitigate a seismic, flooding or severe weather initiating event, did not involve the assumption that the protected equipment or safety function was completely failed or unavailable, and did not involve the total loss of any safety function, identified by Exelon through a PRA, IPEEE or similar analysis that contributes to external event initiated core damage accident sequences. 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 Problem Identification and Resolution, because Exelon did not thoroughly evaluate a problem such that the resolution addressed the cause and extent of condition of an issue that potentially impacted nuclear safety [P.1(c)].

Inspection Report# : [2013004](#) (*pdf*)

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: G 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: **G** 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*)

Barrier Integrity

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

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