Nine Mile Point 1
1Q/2014 Plant Inspection Findings

Initiating Events

Significance: G Dec 01, 2013
Identified By: Self-Revealing
Item Type: NCV NonCited Violation
Improper Bus Restoration Results in a Loss of Shutdown Cooling
The inspectors documented a violation of Unit 1 Technical Specification (TS) 6.4.1, "Procedures," because Constellation Energy Nuclear Group (CENG) failed to properly restore from a loss of a vital direct current (DC) bus in accordance with station off-normal procedures resulting in an unplanned loss of all shutdown cooling (SDC) when time to boil was less than 2 hours. Specifically, operators failed to recognize a potential for loss of SDC during battery bus 12 restoration in accordance with N1-SOP-47A.1, "Loss of DC," Revision 00101, and N1-OP-47A, "VDC Power System," Revision 02500.
Inspection Report# : 2013010 *(pdf)*

Significance: G Dec 01, 2013
Identified By: NRC
Item Type: FIN Finding
Configuration Control error results in loss of a vital DC Bus
The inspectors documented a self-revealing Green finding of CENG's Conduct of Maintenance procedure, CNG-MN-1.01-1000, because CENG personnel failed to verify they were on the proper equipment prior to commencing maintenance activities. Additionally, Risk Management Activities recommended by CNG-OP-4.01-1000, "Integrated Risk Management," such as temporary barriers and signs were not hung to for the protected #12 SDC train and vital 125 VDC battery bus to ensure workers did not assess protected equipment
Inspection Report# : 2013010 *(pdf)*

Mitigating Systems

Significance: G Mar 31, 2014
Identified By: NRC
Item Type: NCV NonCited Violation
Inadequate Design Control Measures Employed During Control Room HVAC Modification
The inspectors identified a Green NCV of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion III, "Design Control," because CENG did not implement adequate design controls to ensure piping in the Reactor Building Closed Loop Cooling (RBCLC) system remained operable while implementing a modification to the Unit 1 control room heating and ventilation system. Specifically, while implementing the modification, CENG

personnel removed permanent plant supports and piping for the safety-related RBCLC system and did not fully assess how this change could impact the operability of the system with respect to a hydraulic shock or seismic acceleration event. In response to this observation, CENG initiated CR-2014-001676 and evaluated the condition for operability. Existing temporary supports were enhanced to provide additional margin by bracing the structure for horizontal loads. An extent of condition walkdown was performed and no additional issues of concern were identified. Subsequently, CENG's operability review determined the RBCLC system had remained operable.

This finding was more than minor because it was 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, while implementing the modification, CENG removed permanent plant supports and piping for the safety-related RBCLC system and did not fully assess how this change could impact the operability of the system if a hydraulic shock or seismic acceleration occurred. This finding is also similar to examples 3.j and 4.k in IMC 0612, Appendix E, "Examples of Minor Issues," where a temporary modification was installed without adequate design information and adequate design controls were not implemented leading to a reasonable doubt of operability of plant components. In accordance with IMC 0609.04, "Initial Characterization of Findings," and Exhibit 2 of IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power," issued June 19, 2012, the inspectors determined this finding is of very low safety significance (Green) because the performance deficiency was a design or qualification deficiency that did not result in the inoperability of the RBCLC system. The finding has a cross-cutting aspect in the area of Human Performance, Work Management, because CENG failed to implement a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. Specifically, CENG failed to ensure that the installed temporary supports were adequate to ensure the RBCLC piping would not be stressed above code allowable values in the event of a seismic acceleration or hydraulic shock event prior to removing the permanently installed seismic supports
Inspection Report# : 2014002 *(pdf)*

Barrier Integrity

Significance: G Dec 31, 2013
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to Perform Surveillance Test for Unit 1 Smoke Removal Dampers
The inspectors identified a Green NCV of Unit 1 license condition DPR-63, Section 2.D(7), "Fire Protection," because CENG staff did not perform visual inspections of fire dampers associated with Unit 1 between 2002 and 2013 in accordance with the Fire Protection Program and Updated Final Safety Analysis Report (UFSAR) Section 10A.2.4.1.10.1.A. As a result, CENG staff determined 25 dampers were non-functional due to the surveillance test not being performed. CENG staff's planned corrective actions include revising the UFSAR to state that performance-based testing requirements apply only to non-smoke removal dampers. Further, the 25 smoke removal dampers will remain non-functional until visual inspections can be performed as planned in work order (WO) C92482273. This issue was entered into CENG's CAP as CR-2013-009208.

This finding is more than minor because it is associated with the structure, system, and component (SSC) and barrier performance attribute of the Barrier Integrity cornerstone and affected the cornerstone objective of providing reasonable assurance that physical design barriers protect the operators in the control room from radionuclide releases caused by accidents or events. The finding was evaluated in accordance with IMC 0609.04, "Initial Characterization of Findings," and Exhibit 3 of IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power," issued June 19, 2012, and the inspectors determined that this finding is of very low safety significance

(Green) because the performance deficiency only represented a degradation of the smoke removal and radiological barrier function provided for the control room. This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because CENG staff failed to identify smoke removal damper visual inspections were not being performed. Specifically, UFSAR section 10A.2.4.1.10.1.A, as part of license condition DPR-63 2.D(7) and the Fire Protection Program, requires CENG staff to perform visual inspections of smoke removal dampers, which was not being performed between 2002 and 2013, resulting in the control room envelope not being operable and 25 smoke removal dampers being declared non-functional. CENG performed an evaluation to determine if the control room habitability requirements contained in TS 3.4.5.f for the control envelope were met. CENG staff subsequently determined that Unit 1 control room habitability requirements of TS 3.4.5.f were met based on previous successful surveillance testing for control room operability testing under N1-ST-C9, "Control Room Emergency Ventilation System Testing," Revision 01502
Inspection Report# : 2013005 *(pdf)*

Significance: G Jun 30, 2013
Identified By: Self-Revealing
Item Type: NCV NonCited Violation
Containment Leakage Exceeds Technical Specification 3.3.3 Limits
A self-revealing non-cited violation of Technical Specification (TS) 3.3.3, "Leakage Rate," was identified for Constellation Energy Nuclear Group's (CENG) failure from December 3 to December 13, 2012, to maintain containment leakage less than 1.5 percent by weight of the containment air per day and less than 0.6 percent by weight of the containment air per day for all penetrations and all primary containment isolation valves subject to Title 10 of the Code of Federal Regulations Part 50, Appendix J, Types 'B' and 'C' tests, when pressurized to 35 pound per square inch gauge when reactor coolant system temperature is above 215 degree Fahrenheit and primary containment integrity is required. CENG entered this issue into their corrective action program as condition report CR-2012-011247. Corrective actions included cleaning iron oxide from the primary containment vent and purge valve and replacing the resilient seals.

This finding is more than minor because it is associated with the structure, system, component, and barrier performance attribute of the Barrier Integrity cornerstone and affected the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. Specifically, containment leakage exceeded the leakage limits outlined in the Unit 1 TS 3.3.3 from December 3 to December 13, 2012. This finding was evaluated in accordance with Inspection Manual Chapter (IMC) 0609.04, "Initial Characterization of Findings," and Table 6.2, "Phase 2 Risk Significance-Type B Findings at Full Power," of IMC 0609, Appendix H, "Containment Integrity Significance Determination Process," issued May 6, 2004. The inspectors determined this finding was of very low safety significance (Green) because the leakage was less than 100 percent of containment volume per day for the duration of the leak. This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because CENG failed to take appropriate corrective action to address safety issues and adverse trends in a timely manner commensurate with their safety significance. Specifically, following identification of the adverse trend regarding the frequency of nitrogen addition to the drywell, CENG did not assess in a timely manner the significance of the leakage and the impact on primary plant containment [P.1(d)].

Inspection Report# : 2013003 *(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

Significance: N/A Aug 23, 2013
Identified By: NRC
Item Type: FIN Finding
PI&R Report Summary
Problem Identification and Resolution
The inspectors concluded that NMPNS was generally effective in identifying, evaluating, and resolving problems. NMPNS personnel identified problems, entered them into the corrective action program (CAP) at a low threshold, and prioritized issues commensurate with their safety significance. In most cases, NMPNS 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 NMPNS typically implemented corrective actions to address the problems identified in the CAP in a timely manner. However, the inspectors identified one violation of NRC requirements in the area of corrective action implementation.
The inspectors concluded that, in general, NMPNS adequately identified, reviewed, and applied relevant industry operating experience to NMPNS operations. In addition, based on those items selected for review, the inspectors determined that NMPNS'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 CAP and employee concerns program (ECP) 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.
Inspection Report# : 2013007 *(pdf)*

Last modified : May 30, 2014