

Oyster Creek 2Q/2014 Plant Inspection Findings

Initiating Events

Significance:  Mar 31, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Untimely Performance of a 50.65 a(4) Risk Evaluation during a Maximum Emergency Generation Action

The inspectors identified a Green non-cited violation of 10 CFR Part 50.65(a)(4), "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," because Exelon did not reassess and manage risk after the grid operator declared a maximum emergency generation action, prior to performing maintenance on the B control rod drive pump on January 30, 2014. The inspectors identified that Exelon assessment of risk was green; however, if the emergency generation action had been included in the assessment, the risk would have been yellow requiring Exelon to perform compensatory actions to limit the risk to the unit. Exelon entered this issue into their corrective action program as issue report 1614625.

The inspectors determined that Exelon's failure to assess and manage risk prior to performing maintenance on the B control rod drive pump after the grid operator declared a maximum emergency generation was a performance deficiency that was reasonably within Exelon's ability to foresee and correct. This finding is more than minor because it is associated with the configuration control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors used NRC inspection manual chapter 0609, appendix K, flowchart 2, "Assessment of Risk Management Actions," to determine the significance of this finding. The inspectors determined that the finding is of very low safety significance (Green).

This finding has a cross-cutting aspect in the area of Human Performance because operators did not stop when faced with uncertain conditions and evaluate and manage risks before proceeding as scheduled. Specifically, the operators continued maintenance without reassessing risk after the inspectors questioned the rationale for not entering the grid emergency procedure [H.11].

Inspection Report# : [2014002](#) (*pdf*)

Significance:  Mar 31, 2014

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Corrective Action to Prevent Recurrence Ineffective to Preclude Repetition of a Significant Condition Adverse to Quality

A self-revealing Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," was identified when the corrective action to prevent recurrence of a significant condition adverse to quality did not preclude repetition of the event. Specifically, Exelon generated a corrective action to prevent recurrence during a root cause evaluation (RCE) for a reactor scram caused by spiking on intermediate range monitor (IRM) nuclear instruments that occurred in May 2004, and a similar event occurred in October 2013, which was determined to be a repeat of the May 2004 event. Exelon is planning to repair the IRM cables in the next refuel outage. Exelon entered this issue into their corrective action program as issue report 1567196.

The inspectors determined that Exelon did not preclude repetition of a significant condition adverse to quality, which was a performance deficiency that was reasonably within Exelon's ability to foresee and correct. This performance

deficiency is more than minor because it is associated with the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. The significance of this finding was determined using NRC IMC 0609 appendix A, exhibit 1. This finding screened as very low safety significance (Green), because the finding did not contribute to both the likelihood of a reactor trip and likelihood that mitigation equipment or functions would not be available.

The finding does not have a cross cutting aspect as it is not reflective of current performance.

Inspection Report# : [2014002](#) (*pdf*)

Mitigating Systems

Significance:  Jun 30, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Identify and Correct High Oil Level in D Emergency Service Water Pump Upper Motor Bearing

The NRC inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," because Exelon did not promptly identify and correct a condition adverse to quality. Specifically, Exelon did not identify and correct a high oil level condition caused by water intrusion in the 'D' emergency service water pump upper motor bearing resulting in an inoperable 'D' emergency service water pump. Following identification of the high level by the inspections, Exelon entered this issue into their corrective action program as issue report 1645010. Exelon's corrective action included sealing joints on top of the motor that are susceptible to water intrusion.

The inspectors determined that inadequate identification and resolution of the condition adverse to quality into the corrective action program is a performance deficiency that was within Exelon's ability to foresee and correct. This finding is more than minor because it is associated with the configuration control 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 service water pump to perform its safety function. 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. The inspectors determined that this finding was a deficiency affecting the design or qualification of a mitigating structure, system, or component (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 high oil level in the emergency service water pump upper motor bearing oil in a timely manner in February and April 2014 [P.1]. (Section 1R15)

Inspection Report# : [2014003](#) (*pdf*)

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*)

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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