

Oyster Creek 3Q/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*)

Barrier Integrity

Emergency Preparedness

Significance:  Sep 30, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Evacuation Time Estimate Submittals

The inspectors identified an NCV of Title 10 of the Code of Federal Regulations (10 CFR) 50.54(q)(2), 10 CFR 50.47 (b)(10), and 10 CFR Part 50, Appendix E, Section IV.4, for failing to maintain the effectiveness of the Oyster Creek emergency plan as a result of failing to provide the station evacuation time estimate (ETE) to the responsible offsite response organizations (OROs) by the required date. Exelon entered this issue into its corrective action program as issue reports 1525923 and 1578649. Additionally, Exelon re-submitted a new revision of the Oyster Creek ETE to the NRC on April 4, 2014, and the NRC's review of that ETE is documented in Section 1EP4 of this report.

The performance deficiency is more than minor because it is associated with the Emergency Preparedness cornerstone attribute of procedure quality and adversely affected the cornerstone objective of ensuring that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The ETE is an input into the development of protective action strategies prior to an accident and to the protective action recommendation decision making process during an accident. Inadequate ETEs have the potential to reduce the effectiveness of public protective actions implemented by the OROs. The finding is determined to be of very low safety significance (Green) because it is a failure to comply with a non-risk significant portion of 10 CFR 50.47(b)(10). The cause of the finding is related to a cross-cutting aspect of Human Performance, Documentation, because Exelon did not appropriately create and maintain complete, accurate, and up-to-date documentation [H.7].

Inspection Report# : [2014004](#) (*pdf*)

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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