

## Limerick 1

### 4Q/2014 Plant Inspection Findings

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#### Initiating Events

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#### Mitigating Systems

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#### Barrier Integrity

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#### Emergency Preparedness

**Significance:** G Sep 30, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

##### **Inadequate Evacuation Time Estimate Submittals**

The inspectors identified a Green NCV of Title 10 of the Code of Federal Regulations (CFR) 50.54(q)(2), 10 CFR 50.47(b)(10), and 10 CFR Part 50, Appendix E, Section IV.4, for not maintaining the effectiveness of the LGS, Units 1 and 2, 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 their corrective action process (CAP) as issue reports (IR) 1525923 and 1578649. Additionally, Exelon re-submitted a new revision of the LGS ETE to the NRC on January 31, 2014.

This 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 LGS is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The finding was determined to be of very low safety significance (Green) because it was 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 the cross-cutting element of Human Performance, Documentation, because LGS did not appropriately create and maintain complete, accurate and, up-to-date documentation [H.7]. (Section 1EP5)

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

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#### Occupational Radiation Safety

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## Public Radiation Safety

**Significance:**  Mar 24, 2014

Identified By: NRC

Item Type: FIN Finding

### **Failure to Evaluate ODCM Change in Accordance with Technical Specification 6.14**

The NRC identified an NCV of T/S 6.14, Offsite Dose Calculation Manual (ODCM), for failure to evaluate and provide sufficient information to support a change to the ODCM. Specifically, LGS revised the ODCM to allow the RHRSW monitors to be non-functional due to loss of flow for a period of up to 4 hours before they were required to be declared inoperable and did not provide sufficient information to support the change including a determination that the change would maintain the level of radioactive effluent release control. LGS entered the issue into their CAP as IR 1639697 and revised the applicable alarm response card (ARC-MRC-010 E4) to declare the monitor inoperable under similar conditions. A dose calculation was also completed that indicated no significant public dose consequences associated with the monitor's inoperable status.

The failure to evaluate and provide sufficient information to support a change to the ODCM, in accordance with the requirements of TS 6.14 is a performance deficiency. This performance deficiency is more than minor because it affected the Public Radiation Safety Cornerstone attribute of Plant Facilities/Equipment and Instrumentation. Using IMC 0609, Appendix D, "Public Radiation Safety Significance Determination Process," dated February 12, 2008, the inspectors determined this to be a finding of very low safety significance (Green) because: the finding was in the effluent release program; was not a substantial failure to implement the effluent program; and the dose to the public did not exceed the 10 Code of Federal Regulations (CFR) Part 50 Appendix I criterion or 10 CFR 20.1301(e) limits. This finding was associated with a cross cutting aspect of Human Performance, Design Margins. Specifically, LGS did not conduct a sufficiently rigorous review of a change in the operability status of a safety-related radiation monitor (RHRSW radiation monitors) to ensure that the change would not adversely impact the level of radioactive effluent release control (H.6).

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

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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

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