

Limerick 2

4Q/2014 Plant Inspection Findings

Initiating Events

Significance: G Dec 31, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Unplanned Manual Power Reduction to 90% on Unit 1.

DRAFT STATUS A self-revealing, Green non-cited violation (NCV) of Technical Specification (TS) 6.8.1.b, “Administrative Controls,” was identified for LGS’s failure to properly implement station procedure MA-AA-716-100, “Maintenance Alterations Process”, during troubleshooting and calibration associated with the condensate filter (CF) system. As a result, on September 9, 2014, one of two Instrument Maintenance (IM) technicians inadvertently mispositioned the air supply valve to the 1G CF flow transmitter causing an unplanned plant transient. The inspectors determined that the failure to properly implement station procedure MA-AA-716-100, “Maintenance Alterations Process” during troubleshooting of CF system instrumentation, was a performance deficiency. LGS promptly performed an investigation, verified the plant alignment and safely returned the Unit 1 reactor to 100 percent power. LGS entered the issue into their corrective action program (CAP) as issue report (IR) 2116233.

This self-revealing finding is more than minor because it affected the human performance attribute of the Initiating Events Cornerstone and affected the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions. This resulted in elevated main steam line radiation levels which required operators to reduce reactor power in accordance with abnormal operating procedures. The inspectors evaluated the finding using inspection manual chapter (IMC) 0609, Appendix A, “The Significance Determination Process for Findings At-Power”, to IMC 0609, “Significance Determination Process.” This finding was determined to be of very low safety significance (Green) because it was associated with a transient initiator, but didn’t cause a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition.

The finding has a cross-cutting aspect in the area of Human Performance, because LGS maintenance management did not ensure supervisory and management oversight of work activities. [H.2] (Section 40A2).

Inspection Report# : [2014005](#) (*pdf*)

Mitigating Systems

Barrier Integrity

Significance: G Jun 30, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Corrective Actions Following Repeat Test Failures of a High Pressure Coolant Injection System Level Instrument

The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for the failure to adequately evaluate and correct repeat calibration test failures in April 2012 and in February 2014 on the Unit 2 high pressure coolant injection (HPCI) system suppression pool level transmitter LT-055-2N062F. This resulted in LT-055-2N062F, a technical specification (TS) required instrument, being in a degraded and unreliable condition. The inspectors determined that failure to adequately evaluate and correct the condition was reasonably within the ability to foresee and correct, and should have been prevented. LGS entered the issue into their corrective action program (CAP) for resolution as Issue Reports (IRs) 1646041, 1651480, and 1659171.

This NRC-identified finding is more than minor because it affected the Barrier Integrity cornerstone attribute of the reliability and availability of structures, systems, or components to maintain the functionality of containment and affected the cornerstone objective to provide reasonable assurance that physical design barriers (containment) protect the public from radionuclide releases caused by accidents or events. The inspectors evaluated the finding using Appendix A, "The Significance Determination Process for Findings At-Power," to IMC 0609, "Significance Determination Process." This finding was determined to be of very low safety significance (Green) because it was associated with the functionality of the reactor containment but didn't represent an actual open pathway in the physical integrity of containment, the containment isolation system, and heat removal components and, the finding did not involve an actual reduction in function of hydrogen igniters. In addition, the logic for the HPCI pump suction swap from the condensate storage tank to the suppression pool on high level in the suppression pool is a one-out-of-two logic. The inspectors determined that this function was available because the other channel which performs the function was not affected by the finding and was available during the time period in question with the exception of during brief testing periods.

The finding has a cross-cutting aspect in Problem Identification and Resolution, Evaluation, because LGS personnel did not thoroughly evaluate the issue to ensure that resolutions addressed the causes and extent of conditions commensurate with their safety significance [P.2].

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

Emergency Preparedness

Significance:  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*)

Occupational Radiation Safety

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*)

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

Last modified : February 26, 2015