

Ginna

1Q/2016 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Jun 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform 1-Hour Fire Tours as Required by the Technical Requirements Manual

The inspectors identified a Green non-cited violation of Ginna Operating License Condition 2.C.(3), "Fire Protection," because Exelon Generation Company, LLC (Exelon) failed to perform 1-hour compensatory fire tours as required by Ginna's Technical Requirements Manual (TRM). Specifically, while a fire barrier component was physically removed, the TRM required a 1-hour fire watch inspection of the affected fire zone; Exelon was performing a 6-hour fire watch. Corrective actions included performing 1-hour fire tours, reinstalling the fire barrier when the work requiring its removal was completed so that fire tours were no longer required, and entering the issue into the corrective action program.

This finding is more than minor because it adversely affected the protection against external factors (i.e., fire) attribute of the Mitigating Systems cornerstone and affected the cornerstone objective of ensuring the availability and reliability of systems that respond to initiating events to prevent undesirable consequences. In accordance with Inspection Manual Chapter (IMC) 0609, Appendix F, "Fire Protection Significance Determination Process," issued on September 20, 2013, the inspectors determined that the finding is of very low significance (Green), because for localized cable protection (task 1.4.4), an automatic suppression system protected the area where the cable protection was affected by the fire finding. Additionally, the finding has a cross-cutting aspect in the area of Human Performance, Resources, because Exelon did not ensure that procedures were adequate to support nuclear safety.

Inspection Report# : [2015002](#) (*pdf*)

Significance: G Jun 30, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Inadequate Procedure Implementation Results in Inadvertent Entry into 72-Hour Technical Specification Action Statement

A self-revealing Green non-cited violation of Technical Specification (TS) 5.4.1, "Procedures," was identified for inadequate implementation of procedure M-71.4, "Removal and/or Installation of Modules within Defeated or Out-of-Service Instrument Loops." Specifically, while performing maintenance procedures for the sodium hydroxide (NaOH) flow loop power supply replacement, Exelon Generation Company, LLC (Exelon) inadvertently caused a short in electrical circuitry that resulted in an automatic switch of instrument bus 'C' from inverter 'B' to its backup power supply; this caused an entry into a 72-hour TS action statement and actuation of the control room emergency air treatment system (CREATS). Corrective actions included entering this issue into the corrective action program.

This finding is more than minor because it was associated with the Mitigating Systems cornerstone and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. In accordance with Inspection Manual Chapter (IMC) 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined that the finding is of very low significance (Green), because the finding was not a deficiency affecting the design or qualification of a mitigating structure, system, and component; did not represent a loss of system and/or function; and did not represent an actual loss of function of at least a single train. Additionally, the finding has a cross-cutting aspect in the area of Human Performance, Avoid Complacency, because Exelon did not recognize and plan for the possibility of mistakes, latent issues, and inherent risk, even while expecting successful outcomes.

Inspection Report# : [2015002](#) (*pdf*)

Significance:  Jun 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Inadequate Preferred Auxiliary Feedwater Protection from Potential Block Wall Failures

The inspectors identified a Green non-cited violation of Title 10 of the Code of Federal Regulations (10 CFR) 50, Appendix B, Criterion III, "Design Control," because Exelon Generation Company, LLC (Exelon) did not provide for verifying or checking the adequacy of design, such as by the performance of design reviews and calculations to ensure that masonry block wall failures in the intermediate building would not challenge preferred auxiliary feedwater (AFW) piping operability. Corrective actions included installation of a temporary modification which corrected the condition and entering this issue into the corrective action program.

This finding is more than minor because it is associated with the design control attribute of the Mitigating Systems cornerstone and affects the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, if nonsafety-related block wall 8-973-8I failed following a design basis seismic event, portions of the turbine-driven and 'B' motor-driven AFW systems could be impacted by falling blocks. In accordance with Inspection Manual Chapter (IMC) 0609.04, "Initial Characterization of Findings," and Exhibits 2 and 4 of IMC 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At Power," the performance deficiency was a deficiency affecting external event mitigation systems (seismic/fire/flood/severe weather protection degraded). The performance deficiency did not involve the degradation of equipment or function specifically designed to mitigate a seismic, flooding, or severe weather initiating event (e.g., seismic snubbers, flooding barriers, tornado doors) only a reasonable doubt regarding the operability of the turbine-driven AFW system. Therefore, the inspectors determined that this finding is of very low safety significance (Green). Additionally, the finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Identification, because Ginna did not implement a corrective action program with a low threshold for identifying issues, and individuals did not identify issues completely, accurately, and in a timely manner in accordance with the program.

Inspection Report# : [2015002](#) (*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

Last modified : July 11, 2016