

## Peach Bottom 3 1Q/2016 Plant Inspection Findings

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### Initiating Events

**Significance:** G Apr 24, 2015

Identified By: NRC

Item Type: FIN Finding

**Failure to Initiate IRs for Out-of-Calibration Single Point Vulnerabilities.**

The inspectors identified a finding of very low safety significance (Green) because PBAPS did not initiate issue reports (IR) to identify out-of-tolerance conditions for a number of single point vulnerability (SPV) instruments. An SPV instrument is any instrument for which a single failure could initiate a plant transient or cause a plant scram. Specifically, during routine preventative maintenance (PM) calibrations, certain SPV instruments' as-found data was found outside expected tolerance bands, with many being significantly outside of their bands. In most cases, IRs were not written to document these adverse conditions contrary to station guidance.

The finding is determined to be more than minor because it affected the reliability of the initiating cornerstone's attribute of equipment performance and affected its objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during power operations. Specifically, by not identifying and trending out-of-calibration SPVs in a timely manner, a resulting transient from the loss of a single feed pump or a single reactor recirculation pump is more likely to occur. The inspectors conducted a Phase 1 screening in accordance with NRC Inspection Manual Chapter (IMC) Attachment 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," and determined that the finding was of very low safety significance (Green) because the finding did not 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 (e.g. loss of condenser, loss of feed water.) A loss of a single feed pump or a single recirculation pump typically results in a power reduction but not a reactor scram.

The inspectors determined that the finding had a cross-cutting aspect in the area of Problem Identification and Resolution, Identification. In the case of the finding, PBAPS did not ensure that degraded conditions, namely, out of tolerance SPV instruments, were promptly reported and documented in the corrective action program at a low threshold. (P.1)

Inspection Report# : [2015008](#) (*pdf*)

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### Mitigating Systems

**Significance:** G Dec 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

**Failure to Ensure Design Basis of EDG Lubrication System**

The inspectors identified a non-cited violation (NCV) of very low safety significance of 10 Code of Federal Regulations (CFR) Part 50, Appendix B, Criterion III, "Design Control," for not ensuring that the adequacy of PBAPS' emergency diesel generator (EDG) lubrication oil (LO) supply was designed to withstand the effects of natural phenomena. Specifically, additional LO, evaluated by PBAPS to meet their EDG technical specification (TS) mission time of seven days of continuous operation, was housed in a non-class I structure that would be unable to

withstand the effects of natural phenomena. PBAPS entered the issue into the correction action program (CAP) as issue report (IR) 02603369 and took immediate corrective actions to relocate the LO reserve inventory from their warehouse to the 135' elevation of the PBAPS' radwaste building, which is a seismic class I structure

The finding is considered more than minor because it is associated with the Protection Against External Factors attribute of the Reactor Safety Mitigating Systems cornerstone and adversely affected the cornerstone's objective of ensuring reliability and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). The inspectors evaluated the significance of this finding using IMC 0609 Appendix A, "The SDP for Findings at Power," Exhibit 2, "Mitigating Systems Screening Questions." The inspectors determined that this finding was of very low safety significance (Green) because the finding is a design deficiency which did not result in an actual loss of functionality of the EDGs. This finding did not have a cross-cutting aspect because the most significant contributor of the performance deficiency (PD) occurred during the 1994 conversion to improved technical specifications (ITS) and, thus, was not reflective of plant performance. Specifically, PBAPS' current engineering change request (ECR) process would evaluate for natural phenomena considerations such as seismic, tornado, flood, etc. (Section 1R22)

Inspection Report# : [2015004](#) (*pdf*)

**Significance:**  Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Incomplete Testing of Components from the Remote Shutdown Panels**

The inspectors identified a Green NCV of Technical Specification (TS) 5.4.1.a after Exelon did not establish and implement procedures to adequately test the Unit 2 and Unit 3 remote shutdown panels (RSPs). Specifically, Exelon's surveillance procedure did not test all the control circuits, as required by Surveillance Requirement (SR) 3.3.3.2.1, for the Unit 2 and Unit 3 RSPs. Exelon's corrective actions included entering this issue into their CAP, the development of RSP testing procedures for the reactor core isolation cooling (RCIC), control rod drive (CRD), and emergency service water (ESW) system components, and a revision to the bases for TS 3.3.3.2.

The performance deficiency (PD) was determined to be more-than-minor because it was associated with the Equipment Performance 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. Additionally, examples 1.c, 4.1, and 4.m from IMC 0612, Appendix E, detail that a PD was more than minor if required TS surveillance testing is not performed and subsequent testing reveals that the equipment is out of specification or otherwise unable to perform a safety-related function. A detailed risk evaluation concluded that the issue was of very low safety significance (Green). This finding had a cross-cutting aspect in Human Performance, Avoid Complacency, because Exelon failed to recognize and plan for the possibility of latent problems. [H.12] (Section 1R15)

Inspection Report# : [2015003](#) (*pdf*)

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## **Barrier Integrity**

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## **Emergency Preparedness**

## Occupational Radiation Safety

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## Public Radiation Safety

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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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