

Peach Bottom 3 2Q/2016 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Jun 30, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Untimely Corrective Actions to Address Condition Adverse to the Fire Protection Program Alternative Shutdown Capability

Green. The inspectors identified an NCV of very low safety significance (Green) of PB Unit 2 and Unit 3 Facility Operating License condition 2.C.(4) for failure to implement and maintain in effect all provisions of the approved fire protection program. Exelon did not correct a condition adverse to the fire protection program alternative shutdown capability in a timely manner. Specifically, Exelon did not establish testing requirements for transfer/isolation switches since the identification of the issue on February 6, 2014, and the due date to complete this action was extended to February 24, 2018. As a result, Exelon has delayed assurance that the components credited for alternative shutdown capability would perform their fire protection design basis function. Exelon entered this issue into their CAP as IR 02669323.

This performance deficiency (PD) was more than minor because it was associated with the protection against external factors (fire) attribute 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, by failing to correct the condition, Exelon has not ensured that the control circuit for the safe shutdown components would be isolated from the effects of fire damage. The inspectors determined that the finding was of very low safety significance (Green) based on IMC 0609, Appendix F, "Fire Protection SDP," task number 1.3.1, because Exelon had demonstrated reasonable expectation of functionality for these switches by having comparable switches in the test program and periodically testing those switches. The test results did not indicate any kind of significant failures of these switches.

This finding was determined to have a cross-cutting aspect in the area of Human Performance, Resources, in that, Exelon extended the due date to complete the corrective action to support the completion of higher priority items, indicating lack of resources. [H.1] (Section 4OA2.2)

Inspection Report# : [2016002](#) (*pdf*)

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: G 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*)

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 : August 29, 2016