

## Ginna

# 3Q/2016 Plant Inspection Findings

---

## Initiating Events

---

## Mitigating Systems

---

## Barrier Integrity

---

## Emergency Preparedness

**Significance:** G Sep 30, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to Perform Drills Required by the Site Emergency Plan.**

The inspectors identified a Green non-cited violation of Title 10 of the Code of Federal Regulations (10 CFR) 50.54 (q)(2) for Exelon's failure to maintain an emergency plan that meets the requirements in Appendix E, "Content of Emergency Plans," to Part 50 and the planning standards of 50.47(b). Specifically, Exelon did not perform a drive-in augmentation drill during the required 3-year cycle nor did they perform a health physics drill semi-annually as required by Ginna's Emergency Plan Implementing Procedure EP-AA-122-100, "Drill and Exercise Planning and Scheduling." Immediate corrective actions included entering this issue into their corrective action program.

This finding is more than minor because it is associated with the emergency response organization readiness attribute of the Emergency Preparedness cornerstone and adversely affected the cornerstone objective to ensure that Exelon is capable of maintaining adequate measures to protect the health and safety of the public in the event of a radiological emergency. In accordance with Inspection Manual Chapter 0609, Appendix B, "Emergency Preparedness Significance Determination Process," Attachment 2, "Failure to Comply Significance Logic," the inspectors determined that the performance deficiency affected planning standard 10 CFR 50.47(b)(14). The inspectors concluded that this performance deficiency matched an example on Table 5.14-1, "Significance Examples §50.47(b) (14)," for a degraded planning standard function. Specifically, two drills had not been conducted during a 2-year (calendar) period in accordance with the emergency plan, thus constituting a degraded planning standard function which corresponds to a very low safety significance (Green) finding. The cause of the finding has a cross-cutting aspect in the area of Human Performance, Procedure Adherence, because Exelon did not schedule or plan for a drive-in augmentation drill or health physics drills in accordance with procedure EP-AA-122-100.

Inspection Report# : [2016003](#) (*pdf*)

**Significance:** W Jun 30, 2016

Identified By: NRC

Item Type: VIO Violation

### **Incorrect Emergency Action Level Table**

The NRC staff performed this supplemental inspection pursuant to Inspection Procedure (IP) 95001, "Supplemental Inspection Response to Action Matrix Column 2 Inputs," at the R.E. Ginna Nuclear Power Plant, LLC (Ginna), to assess Exelon's root cause evaluation and associated corrective actions taken in response to a finding of low to moderate safety significance (White) associated with the Emergency Preparedness cornerstone. The finding was identified in the second quarter 2016 integrated inspection report (ML16232A051) dated August 18, 2016. The finding was associated with Exelon's implementation of a revision to the emergency action level (EAL) table for the fission product barrier matrix that was incorrect with respect to the EAL threshold associated with potential loss of containment barrier. This condition could have resulted in an untimely declaration of a General Emergency or a failure to declare a Site Area Emergency during an actual event. The final significance determination, notice of violation, and follow-up assessment letter (ML16262A213) for this finding issued on September 20, 2016, documented that Ginna transitioned to the Regulatory Response Column of the ROP Action Matrix retroactive to the second quarter of 2016. The NRC staff was informed on October 5, 2016, of Exelon staff's readiness for this inspection.

Based on the results of the inspection, no significant weaknesses or findings were identified. The inspectors concluded that Exelon had adequately performed a root cause analysis of the event, and corrective actions, both completed and planned, were reasonable to address the related issues. Based on the guidance in Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," dated December 23, 2015, and the results of this inspection, the White finding will be closed. However, Ginna will remain in the Regulatory Response Cornerstone until four calendar quarters have passed from when the finding became effective which will be the end of the first quarter of 2017.

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

Inspection Report# : [2016009](#) (*pdf*)

Inspection Report# : [2016010](#) (*pdf*)

---

## **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.

---

## 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.

---

## 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 : December 08, 2016