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## Nine Mile Point 2 – Quarterly Plant Inspection Findings

### 3Q/2017 – Plant Inspection Findings

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#### Initiating Events

#### Mitigating Systems

**Significance:** G Jun 30, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Inadequate Extent of Condition results in Unplanned Yellow Risk Condition**

The inspectors identified a Green NCV of 10 CFR 50.65(a)(4), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," when Exelon did not assess and manage the increase in risk for online maintenance activities. Specifically, on May 24, 2017, the inspectors identified a planned surveillance activity which caused unavailability of the 'A' RHR minimum flow valve that was not recognized by the Exelon staff as a, Yellow, elevated risk activity in accordance with their EOOS (Equipment Out of Service) probabilistic risk assessment (PRA) model. Exelon staff generated IR 04015294 to address the failure to recognize the, Yellow, elevated risk activity and failure to review adequate extent of condition. Corrective actions include evaluating PRA to assess if risk can be reduced to Green with compensatory actions and providing training to operations to enhance PRA modeling of system availability. Following review of the PRA model, Exelon plans to evaluate all surveillance procedures as part of extent of condition that could impact availability of the 'A' RHR minimum flow valves.

This finding is more than minor because it affected the human performance attribute of 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. Specifically, on May 24, 2017 the inspectors identified a planned activity that resulted in an unplanned Yellow risk activity during planned maintenance that resulted in unavailability of a component used to support the 'A' RHR system. Additionally, this issue is similar to Example 7.f of IMC 0612, Appendix E, "Examples of Minor Issues," issued August 11, 2009, because the overall elevated plant risk placed the plant into a higher licensee-established risk category. The inspectors evaluated the finding using Phase 1, "Initial Screening and Characterization" worksheet in Attachment 4 to IMC 0609, "Significance Determination Process." For findings within the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones, Attachment

4, Table 3, Paragraph 5.C, directs that if the finding affects the licensee's assessment and management of risk associated with performing maintenance activities under all plant operating or shutdown conditions in accordance with Baseline Inspection Procedure 71111.13, "Maintenance Risk Assessment and Emergent Work Control," the inspectors shall use IMC 0609, Appendix K, "Maintenance Risk Assessment and Risk Management Significance Determination Process," to determine the significance of the finding. The inspectors used Flowchart 1, "Assessment of Risk Deficit," to analyze the finding and calculated incremental core damage probability using EOOS, Exelon's risk assessment tool. The inspectors determined that had this condition existed for the full duration of the TS LCO, the incremental conditional core damage probability would have been  $3E-9$ . Because the incremental core damage probability deficit was less than  $1E-6$  and the incremental large early release probability was less than  $1E-7$ , this finding was determined to be of very low safety significance (Green). This finding has a cross-cutting aspect in the area of Human Performance, Teamwork, because Exelon staff did not effectively communicate internally to ensure that corrective actions were being addressed to resolve concerns with risk associated with 'A' RHR minimum flow valve availability. Specifically, Exelon staff incorrectly believed that Integrated Risk Management guidance corresponded to PRA availability. Thus, it was assumed risk would remain Green during surveillance and maintenance activities that resulted in the 'A' RHR minimum flow valve bring unavailable; and a failure to recognize future maintenance activities that resulted in risk being Yellow.

Inspection Report# : 2017002 (*pdf*)

### **Barrier Integrity**

### **Emergency Preparedness**

### **Occupational Radiation Safety**

### **Public Radiation Safety**

### **Security**

The security cornerstone is an important component of the ROP, which includes various security inspection activities the NRC uses to verify licensee compliance with Commission regulations and thus ensure public health and safety. The Commission determined in the staff requirements memorandum (SRM) for SECY-04-0191, "Withholding Sensitive Unclassified Information Concerning Nuclear Power Reactors from Public Disclosure," dated November 9, 2004, that specific information related to findings and performance indicators associated with the security cornerstone will not be publicly available to ensure that security-related information is not provided to a possible adversary. Security inspection report cover letters will be available on the NRC Web site; however, security-related information on the details of inspection finding(s) will not be displayed.

### **Miscellaneous**

Current data as of : November 29, 2017

*Page Last Reviewed/Updated Monday, November 06, 2017*