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Peach Bottom 3 – Quarterly Plant Inspection Findings

4Q/2017 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: G Aug 03, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Corrective Action not Implemented Correctly for Replacement of Reactor Core Isolation Cooling (RCIC) Reverse Control Relay (RCR) Contacts

A self-revealing non-cited violation (NCV) of 10 Code of Federal Regulation (CFR) Part 50, Appendix B, Criterion XVI, Corrective Actions, of very low safety significance (Green) was identified for Exelon not correcting a condition adverse to quality concerning reverse control relay (RCR) contacts for valves associated with the reactor core isolation cooling (RCIC) system. Specifically, Exelon specified a corrective action (CA) from an October 18, 2013, Unit 3 RCIC equipment apparent cause evaluation (EACE) to replace RCR contacts after 12 years of service, however, the CA was not correctly implemented. As a result, on January 12, 2017, an RCR contact associated with the Unit 3 RCIC suppression pool suction valve remained in service for 15 years, exhibited a high resistance failure during a surveillance which resulted in Unit 3 RCIC being inoperable. Following the failure, Exelon initiated issue reports (IRs) 03962563 and 03977949, implemented corrective actions to replace the RCR contact, restored Unit 3 RCIC operability, and risk-informed their corrective maintenance schedule for replacing all RCR contacts that currently exceeded the recommended 12-year service life.

Exelon's failure to recognize and correct a condition adverse to quality associated with certain RCR contacts in their Unit 3 RCIC system that had exceeded their 12-year service life, was a performance deficiency (PD) that was within their ability to foresee and correct and should have been prevented. The finding was more than minor because it was associated with the equipment performance attribute of the Mitigating Systems cornerstone and affected the cornerstone's objective to ensure the reliability of systems to respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, not recognizing that existing RCR contacts were installed in safety-

related equipment beyond their 12-year service life, resulted in the failure of the Unit 3 RCIC suppression pool suction valve. The inspectors evaluated the finding in accordance with Exhibit 2 of IMC 0609, Appendix A, "SDP for Findings At-Power," and determined the finding was of very low safety significance (Green) because it did not represent a loss of system function or represent an actual loss of function of at least a single train for longer than its technical specification (TS) allowed outage time of 14 days. The inspectors determined that the finding has a cross-cutting aspect in Human Performance, Procedure Adherence, because Exelon did not validate that the correct revision of procedure WC-AA-120, Attachment 2, "Preventive Maintenance (PM) Change Review Form," was used when creating a new PM to replace RCR contacts. [H.8] (Section 1R15)

Inspection Report# : 2017002 (*pdf*)

Barrier Integrity

Significance: G May 11, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Untimely Corrective Actions to Address Elevated Primary Containment Isolation Valve Leakage

The inspectors identified a self-revealing non-cited violation of 10 CFR 50 Appendix B, Criterion XVI, Corrective Action, because Exelon did not promptly implement corrective actions to address a condition adverse to quality on two containment isolation valves. Specifically, drywell air sampling valves SV 3 7D 3671A and SV-3-7D-3671D failed to perform their primary containment isolation function on March 15 and September 26, 2016, respectively, as a result of untimely corrective actions to address elevated leakage. The valve internals were repaired, declared operable, and the issue was entered into the corrective action program (IR 3990490).

The finding was more than minor, because it was associated with the barrier performance attribute of the Barrier Integrity cornerstone and adversely affected the cornerstone's objective to provide reasonable assurance that the containment design barrier protect the public from radionuclide releases caused by accidents or events. In accordance with IMC 0609.04, Initial Characterization of Findings, dated October 7, 2016, and Exhibit 1 of IMC 0609, Appendix A, The SDP for Findings At-Power, dated June 19, 2012, the inspectors determined this finding was of very low safety significance, because the finding did not result in an actual open pathway in the physical integrity of the reactor containment or involve an actual reduction in the function of hydrogen igniters in the reactor containment. The inspectors determined this finding had a cross-cutting aspect in the area of Problem Identification and Resolution, Resolution, because Exelon did not perform effective corrective actions in a timely manner commensurate with the safety significance of the issue. Specifically, corrective actions to address a CAQ on SV-3-7D-3671A and SV 3 7D 3671D were delayed which resulted in the valves failing their LLRT and being declared inoperable. [P.3] [Section 40A2.1.c (2)]

Inspection Report# : 2017008 (*pdf*)

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 : February 01, 2018

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