March 1, 2002

Mr. Oliver D. Kingsley
President and CNO
Exelon Nuclear
Exelon Generation Company, LLC
200 Exelon Way, KSA 3-E
Kennett Square, PA 19348

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION - NRC INSPECTION REPORT 50-277/01-15, 50-278/01-15

Dear Mr. Kingsley:

On February 16, 2002, the NRC completed an inspection at the Peach Bottom Atomic Power Station. The enclosed report documents the inspection findings which were discussed on February 21, 2002, with Mr. Jay Doering and other members of your staff.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued an advisory recommending that nuclear power plant licensees go to the highest level of security, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants remain at the highest level of security and the NRC continues to monitor the situation. This advisory was followed by additional advisories, and although the specific actions are not releasable to the public, they generally include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with law enforcement and military authorities, and more limited access of personnel and vehicles to the sites. The NRC has conducted various audits of your response to these advisories and your ability to respond to terrorist attacks with the capabilities of the current design basis threat (DBT). On February 25, 2002, the NRC issued an Order to all nuclear power plant licensees, requiring them to take certain additional interim compensatory measures to address the generalized high-level threat environment. With the issuance of the Order, we will evaluate Exelon's compliance with these interim requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

If you have any questions, please contact me at 610-337-5209.

Sincerely,

/RA/

Mohamed Shanbaky, Chief
Projects Branch 4
Division of Reactor Projects

Docket Nos.: 50-277, 50-278
License Nos.: DPR-44, DPR-56

Enclosure: Inspection Report No. 50-277/01-15 and 50-278/01-15

Attachment: (1) Supplemental Information

cc w/encl: C. G. Pardee, Senior Vice President, Mid-Atlantic Regional Operating Group
J. Cotton, Senior Vice President, Operations Support
W. Bohlke, Senior Vice President, Nuclear Services
J. Skolds, Chief Operating Officer
J. Doering, Vice President, Peach Bottom Atomic Power Station
G. Johnston, Plant Manager, Peach Bottom Atomic Power Station
J. A. Benjamin, Vice President - Licensing and Regulatory Affairs
M. Gallagher, Director, Licensing, Mid-Atlantic Regional Operating Group
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D. A. Henry, Manager, Experience Assessment
J. W. Durham, Sr., Senior Vice President and General Counsel
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Mr. & Mrs. Dennis Hiebert, Peach Bottom Alliance
Mr. & Mrs. Kip Adams
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Region I Docket Room (with concurrences)

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U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Docket Nos:	50-277, 50-278
License Nos:	DPR-44, DPR-56
Report Nos:	50-277/01-15, 50-278/01-15
Licensee:	Exelon Generation Company, LLC Correspondence Control Desk 200 Exelon Way, KSA 1-N-1 Kennett Square, PA 19348
Facility:	Peach Bottom Atomic Power Station Units 2 and 3
Location:	1848 Lay Road Delta, Pennsylvania
Inspection Period:	December 30, 2001 through February 16, 2002
Inspectors:	A. Burritt, Senior Resident Inspector M. Buckley, Resident Inspector R. Nimitz, Senior Health Physicist J. Jang, Senior Radiation Specialist
Approved by:	Mohamed M. Shanbaky, Chief Projects Branch 4 Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000277-01-15, IR 05000278-01-15, on 12/30-02/16/2002; Exelon Generation Company, Peach Bottom Atomic Power Station; Units 2 and 3. Integrated report.

This report was conducted by resident inspectors, a senior health physicist, and a senior radiation specialist. The inspection identified no findings of significance. The significance of most findings is indicated by the color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply are indicated by "no color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at: http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html

A. Inspector Identified Findings

No findings of significance were identified.

B. Licensee Identified Violations

Violations of very low significance, identified by Exelon, have been reviewed by the inspectors. Corrective actions, taken or planned by Exelon, appear reasonable. These violations are described in Section 40A7 of this report.

Report Details

SUMMARY OF PLANT STATUS

UNIT 2

Unit 2 began this inspection period operating at 100% power and remained at or near that power except for scheduled power changes to support routine maintenance activities and rod pattern adjustments.

UNIT 3

Unit 3 began this inspection period operating at 100% power. On January 11, 2002, operators commenced a planned power reduction to approximately 17% to make repairs to a transformer associated with the main generator. Following repairs, the unit power was increased and reached 100% on January 16, 2001. On January 24, 2001, power was reduced to 72% due to a recirculation pump runback caused by a loose electrical connection in the associated control circuitry. Unit 3 was returned to approximately 100% on January 26, 2000. Unit 3 operated at approximately 100% power throughout the remainder of the inspection period except for scheduled power changes to support routine maintenance activities and rod pattern adjustments.

1. REACTOR SAFETY [R]
Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R04 Equipment Alignment (71111.04)

.1 Partial System Walkdowns

a. Inspection Scope

The inspectors performed partial system walkdowns to verify system and component alignments and note any discrepancies that would impact system operability. The inspectors verified selected portions of redundant or backup systems/trains were available while a system was out-of-service. The inspectors reviewed selected valve positions, electrical power availability, and the general condition of major system components. The walkdowns involved the following systems:

- Unit 2 standby liquid control
- 4KV emergency electrical buses with the station blackout line out-of-service for maintenance

b. Findings

No findings of significance were identified.

.2 Complete System Walkdown

a. Inspection Scope

The inspectors performed a complete system walkdown to verify that the selected system was properly aligned for operation. The inspectors reviewed valve positions, electrical power availability, and the general condition of major system components. In addition, the inspectors reviewed the Final Safety Analysis Report (FSAR), system design drawings, and issues tracked by the system health report (condition reports, work orders, and action requests). These reviews were conducted to identify discrepancies that could impact system operability. The complete system walkdown was performed on the following:

- Unit 2 reactor core isolation cooling system

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors reviewed the Fire Protection Plan, Technical Requirements Manual, and the respective Pre-Fire Action Plan procedures to determine the required fire protection design features, fire area boundaries, and combustible loading requirements for the areas examined during this inspection. The inspectors then performed walkdowns of these area to assess control of transient combustible material and ignition sources, fire detection and suppression capabilities, fire barriers, and any related compensatory measures. The fire areas included:

- Emergency diesel generators building, including the E1 through E4 diesel rooms, cardox room, and ventilation rooms
- Unit 2 battery rooms
- Unit 2 emergency switchgear rooms
- Unit 2 recirculation pumps motor/generator rooms

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the follow-up actions for issues identified on systems, structures, or components (SSCs) and the performance of these SSCs, to assess the effectiveness of Exelon's maintenance activities. In addition, the inspectors reviewed selected SSC classification, performance criteria and goals, and corrective actions to

verify that the actions were reasonable and appropriate. The following systems, equipment problems, and documents were reviewed:

Systems

- Unit 3 standby liquid control system
- 3B residual heat removal pump, torus suction valve motor operator (MO-3-10-13B-OP) - damaged worm shaft clutch gear and torque switch set too high

Procedures and Documents

- Peach Bottom System Health Overview Reports
- Peach Bottom Maintenance Rule Bases Documentation
- Action Requests (A1354181, A0684258, A1351030, A1351886, A1346379)
- AG-CG-028.1, "Maintenance Rule Implementation Program"
- AG-CG-028.1-5, "PECO Energy Approach to Use Maintenance Preventable Functional Failures for Maintenance Rule Performance Monitoring"
- AG-CG-028.1-9, "Guidance for Identifying and Evaluating Maintenance Preventable Functional Failures"
- AG-CG-028.1-3, "Rules for Governing Expert Panel Activities"
- AG-CG-028.1-6, "PECO Energy Approach to Setting Acceptable Performance Levels for Monitoring Maintenance Preventable Functional Failures"

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed Exelon's risk evaluations and contingency plans for selected planned and emergent work activities to verify that appropriate risk evaluations were performed and to assess Exelon's management of overall plant risk. The inspectors compared the risk assessments and risk management actions against the requirements of 10 CFR 50.65(a)(4) and the recommendations of NUMARC 93-01 Section 11, "Assessment of Risk Resulting from Performance of Maintenance Activities." The inspectors verified that risk assessments were performed when required and appropriate risk management actions were identified.

The inspectors attended planning meetings and discussed the risk management of the activities with operators, maintenance personnel, system engineers, and work coordinators to verify that risk management action thresholds were identified correctly. The inspectors also verified that appropriate implementation of risk management actions were performed. The following planned and emergent work activities were reviewed:

- Station blackout maintenance with the 220-3435 line out-of-service
- Rescheduling of the 2A core spray logic system functional test and the Unit 2 high-pressure service water pump valve and flow test

- 343 startup transformer out-of-service for maintenance and testing

In addition, the inspectors reviewed the assessed risk configurations against the actual plant conditions and any in-progress evolutions or external events to verify that the assessments were accurate, complete, and appropriate for the issues. The inspectors performed control room and field walkdowns to verify that compensatory measures identified by the risk assessments were appropriately performed.

b. Findings

No findings of significance were identified.

1R14 Personnel Performance Related to Non-routine Plant Evolutions and Events (71111.14)

a. Inspection Scope

The inspectors reviewed plant computer and recorder data, operator logs and approved procedures and observed control room operators while evaluating the performance of operations personnel in response to non-routine evolutions. The inspectors assessed personnel performance to determine whether the operator response was appropriate and in accordance with procedures and training. The following non-routine evolutions were observed:

- Reactor power reduction and removal of the main generator from service for repairs
- Resetting of a recirculation system runback per SO 2D.7.B-3, “Recirculation Motor Generator Set Scoop Tube Lockup and Reset” following troubleshooting and repair of the control circuitry

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed two operability evaluations to assess the adequacy of the evaluations, the use and control of compensatory measures, compliance with the Technical Specifications, and the risk significance of the issues. The inspectors verified that the operability determinations were performed in accordance with NOM-C-11.1, Rev. 1, “Operability” and A-C-901, Rev. 10, “Control of Nonconformances.” The inspectors used the Technical Specifications, Technical Requirements Manuals, the Final Safety Analysis Report, and associated Design Basis Documents as references during these reviews. The issues reviewed included:

- High-pressure coolant injection outboard isolation valve (MO-2-23-016) after a packing adjustment
- Unit 3 reactor water cleanup high flow isolation instrument calibration with air in the instrument sensing and/or calibration lines

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing (71111.19)

a. Inspection Scope

The inspectors observed portions of post-maintenance testing activities in the field and reviewed selected test data at the job site. The inspectors observed whether the tests were performed in accordance with the approved procedures and assessed the adequacy of the test methodology based on the scope of maintenance work performed. In addition, the inspectors assessed the test acceptance criteria to verify whether the test demonstrated that the tested components satisfied the applicable design and licensing bases and the Technical Specification requirements. The inspectors reviewed the recorded test data to evaluate whether the acceptance criteria were satisfied. The specific activities reviewed included:

- Station blackout line testing after knife switch realignment/balancing
- B emergency service water pump after maintenance
- ST-O-010-306-3, "B" Residual Heat Removal Loop Pump, Valve, Flow and Unit Cooler Functional and Inservice test," as post-maintenance testing for residual heat removal valve and motor planned maintenance

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed and observed portions of following surveillance tests, and compared test data with established acceptance criteria to verify the systems demonstrated the capability of performing the intended safety functions. The inspectors also verified that the systems and components maintained operational readiness, met applicable Technical Specification requirements, and were capable of performing the design basis functions. The observed or reviewed surveillance tests included:

- ST-I-013-100-2, Unit 2 Reactor Core Isolation Cooling Logic System Functional Test
- ST-I-014-100-2, 2A Core Spray Logic System Functional Test
- S12K-54-E32-XXFM, E32 4KV Undervoltage Relay Functional Test

b. Findings

No findings of significance were identified.

2. RADIATION SAFETY
Cornerstone: Occupational Radiation Safety [OS]

2OS3 Radiation Monitoring Instrumentation

a. Inspection Scope (71121.03)

The inspector reviewed the calibration of various radiological survey, monitoring, and measurement instrumentation. The instruments reviewed included portable, fixed, laboratory, and process instrumentation. The inspector also reviewed maintenance and use of self-contained breathing apparatus. The following activities were conducted:

- The inspector reviewed radiation monitoring instruments used by radiological controls personnel during various radiological work activities to determine if properly calibrated and checked instrumentation was used. The work activities reviewed were: entry by workers into the Unit 2 reactor drywell with the reactor at power on December 1, 2001; conduct of maintenance activities on Units 2 and 3 reactor traversing incore instrumentation on January 30-31, 2002, and conduct of radiological characterization measurements on underwater activated components on November 1, 2001.
- The inspector reviewed procedure guidance for actions to be taken upon identification of radiological survey instruments that failed source checks including completion of non-conformance reports.
- The inspector evaluated calibration sources to determine if the sources were appropriate for radiation types and energies encountered within the facility.
- The inspector observed a technician conduct a daily source check of an instrument (E-530 Sn. No. 4462)
- The inspector reviewed calibration and checking of whole body counting equipment, whole body personnel contamination monitoring equipment, and laboratory counting equipment.
- The inspector reviewed calibration of area radiation monitors located in areas of potential changing dose rates.
- The inspector reviewed recent calibration records for various instrumentation. Calibration records for the following instruments were reviewed to evaluate the adequacy of calibration and the conformance with applicable calibration procedures and programs.

Portable Instruments:

- RO2 (Sn. Nos. 4051, 449, 322865, 332862, 5622)
- RM-14 (Sn. Nos. 812, 3276, 2105, 5622, 7314)
- RO-7 (Sn. Nos. 667, 636, 826, 256)
- E-520 (Sn. Nos. 3197, 4250, 4452, 4462)
- E-530 (Sn. Nos. 1350, 1335)
- Bicron (Sn. Nos. 681, 333031)
- MDH Ion Chambers (Sn. Nos. 5437, 7349)
- ASP-1 (Sn. No. 20127)
- Electronic dosimeters (Sn. Nos. 94321, 942910, 941710, 971922, 950769)
- AMS-4 air monitor (Sn. No. 334635)
- GAST air sampler (Sn. No. 985)

Laboratory and Whole body

- BC-4 (Sn. No. 333543)
- SAC-4 (Sn. No. 722)
- Whole body counter (Accuscan)
- Whole body counter (Fastscan)
- Whole body contamination- PM-7 (Sn. No. 332687)
- Whole body contamination- PCM (Sn. No. 239)
- Whole body contamination - Aptec (Sn. No. 9712002)

Process Instruments:

- High Range Drywell Monitoring Instruments (Channels A, B, C, D)
- PASS Sample Station Monitor Area and Liquid Monitor
- Area Radiation Monitors (7-9, 7-10, 7-11, 7-12, 6-11, 3-8, 3-9, 2-5)

The inspector also reviewed the use and testing of self-contained breathing apparatus (SCBA) to determine if adequate quantities of such devices were available, filling stations were available, and appropriate personnel had been trained in the use of the devices, including the changing of air bottles. The inspector reviewed SCBA training and qualification records for 5 crews of control room operators (43 individuals) for the week of February 4, 2002, as well as two fire brigade crews (10 individuals). The inspector also reviewed periodic testing of SCBA components (i.e., hydro testing of tank, maintenance and testing of regulators) and reviewed conformance of the SCBAs with published certification lists. The components of selected SCBA units, ready for use and stored in the Control Room and the Operations Support Center, were checked against approved component lists published by the SCBA manufacturer and the National Institute for Occupational Safety and Health.

The review was against criteria contained in applicable licensee procedures, 10 CFR 20, applicable Technical Specifications, and industry standards.

b. Findings

No findings of significance were identified.

Cornerstone: Public Radiation Safety [PS]

2PS1 Gaseous and Liquid Effluents

a. Inspection Scope (71122.01)

The inspector reviewed the following documents to evaluate the effectiveness of the licensee's radioactive gaseous and liquid effluent control programs. The requirements of the radioactive effluent controls were specified in the Improved Technical Specifications/Offsite Dose Calculation Manual (ITS/ODCM):

- 2000 Radiological Annual Effluent Release Report and Radiation Dose Assessment Reports
- Review the current ODCM (Revision 12, May 17, 2000) and technical justifications for ODCM changes made
- Review ODCM updating process (for Revision 13), including technical justifications
- Analytical results for charcoal cartridge, particulate filter, and noble gas samples
- Implementation of the compensatory sampling and analysis program when the effluent radiation monitoring system (RMS) is out of service
- Selected 2000 and 2001 radioactive liquid and gaseous release permits, including burning of radioactive waste oil required by Section 3.8.C of the ODCM
- Implementation of the NRC Bulletin 80-10 sampling program
- Associated effluent control procedures, including analytical laboratory procedures
- Calibration records for laboratory measurements equipment (gamma and liquid scintillation counters)
- Implementation of the measurement laboratory quality control program, including effluent intra-laboratory and inter-laboratory comparisons and control charts
- Action Request (AR) Nos: A1209221; A1285297; and A0819971, and corrective actions
- 2001 Effluent/ODCM self-assessments
- Continuous Assessment (1st Quarter 2001) by Exelon Nuclear Oversight for the radiological effluent control/ODCM implementations
- The most recent surveillance testing results (visual inspection, delta P, in-place testings for HEPA and charcoal filters, air capacity test, and laboratory test for iodine collection efficiency) for control room and standby gas treatment system listed in ITS 5.5.7, Ventilation Filter Testing Program
- The most recent Channel Calibration and Channel Functional Test results for the radioactive liquid and gaseous effluent radiation monitoring system (RMS) and its flow measurement devices as listed in the ODCM for both units

RMS

- Liquid radwaste effluent line radiation monitor (common)
- Service water radiation monitors (units 2 & 3)
- High pressure service water radiation monitors (units 2 & 3)
- Reactor building closed cooling water radiation monitors (units 2 & 3)
- Reactor vent stacks noble gas monitors (units 2 & 3)

- Main stack noble gas monitor (common)
- Reactor vent stacks high range noble gas monitors (units 2 &3)
- Main stack high range noble gas monitor (common)

Flow Measurement Device

- Liquid radwaste effluent line flow monitor (common)
- Main stack flow monitor (common)

The inspector toured and observed the following activities to evaluate the effectiveness of the licensee's radioactive gaseous and liquid effluent control programs.

- Walkdown to determine the operability of air cleaning systems and to determine the equipment material condition
- The observation of radioactive filter and charcoal cartridge sampling and preparation for gamma spectrometry measurements
- The observation of tritium sampling at the main stack and preparation for measurements

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES [OA]

4OA1 Performance Indicator Verification (71151)

.1 Safety System Unavailability (SSU)

a. Inspection Scope (71151)

The inspector reviewed the data for the residual heat removal unavailability performance indicator to ensure that Exelon met all requirements of the performance indicator from the fourth quarter 2000 to the fourth quarter 2001 for both units. The information contained in the data was compared against the criteria contained in Nuclear Energy Institute (NEI) 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 1, to verify that all conditions that met the NEI criteria, for system unavailability, were recognized, identified, and reported as a Performance Indicator.

b. Findings

No findings of significance were identified.

4OA3 Event Follow-up (71153)

.1 (Closed) LER 3-01-002-00: Less than Adequate Test Review Results in Low Pressure Emergency Core Cooling Safety Function Degradation

On November 16, 2001, the low pressure emergency core cooling safety function was degraded for approximately two hours as a result of having the 'A' loop of low pressure coolant injection out of service due to an inoperable isolation valve and the concurrent inoperability of other emergency core cooling system equipment during the performance of a logic system functional test. This event was caused by an inappropriate review of the logic system functional test that led to continuation of the testing without appropriate compensatory measures when the "A" low pressure coolant injection system was inoperable. This issue has been entered into the licensee's corrective action program as CR00083213 The results of the inspector's on-site review of this LER is described in Section 4OA7 of this report. This LER is closed.

.2 (Closed) LER 2-97-009-01: Unit 2 Reactor Scram Resulting from a Generator Lockout Condition and Subsequent Turbine Trip Failure of the 2A Reactor Feedpump

The revision of LER 2-97-009, discussed anomalies found with the 2 A reactor feedpump turbine trip system as well as several Engineered Safety Feature actuations associated with the turbine trip. The inspector performed an onsite review of this revised LER, when it was issued, and did not identify any new issues. This LER is closed.

.3 (Closed) LER 2-97-010-01: Failure of the 2A Reactor Feedpump Turbine to Trip

The revision of LER 2-97-010, discussed additional information and analysis that supported the conclusion that the reactor feed pump high level trip function would operate properly during an actual high reactor water level event. The inspector performed an onsite review of this revised LER, when it was issued, and did not identify any new issues. This LER is closed.

.4 (Closed) LER 2-99-006-01: Engineered Safety Feature Actuations Following the Turbine Trip and the Requirements of 10 CFR 50.73 (a)(2)(i)(B) for Exceeding the Heatup Rate Specified by the Technical Specifications

The revision of LER 2-99-006, updated the information addressing the cause of the heatup rate event. The inspector performed an onsite review of this revised LER when it was issued and did not identify any new issues. This LER is closed.

.5 (Closed) LER 3-99-002-01: Failure to Maintain Alarmed Access Control to a Safeguards System Vital Area Door Upon Completion of Scheduled Maintenance

The revision of LER 3-99-002 was submitted to correct the title and does not change the reportability requirements or any other information contained in the original submittal. This LER is closed.

4OA6 Meetings

.1 Exit Meeting Summary

The inspectors presented the results of the inspection to Mr. J. Doering and members of Exelon's management on February 21, 2002. Exelon management acknowledged the findings presented. No proprietary information was identified.

4OA7 Licensee Identified Non-Compliance

The following findings of very low significance were identified by Exelon and are violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as a Non-Cited Violation.

NCV Tracking Number	Requirement Licensee Failed to Meet
50-277;278/01-15-01	Technical Specification 6.11 requires that the licensee implement radiation protection procedures. Procedure HP-C-310 requires workers to notify radiation protection personnel of radiological problems and follow written and oral radiation protection guidance including notifying radiation protection upon an electronic dosimetry alarm. During early January 2002, at least 5 individuals experienced dosimetry alarms and did not contact radiation protection. The matter was addressed by various corrective actions and entered into the corrective action process (CR No. 93464).
50-277/01-15-02	Technical Specification 5.4.1 requires written procedures be established, implemented, and maintained covering activities listed in Regulatory Guide 1.33. Regulatory Guided 1.33 includes procedures for performing surveillance tests on plant equipment. Contrary to the above, on November 16, 2001, operators did not verify compliance with Technical Specification 3.5.1 as required by ST-I-010-100, “Residual Heat Removal (RHR) Loop Logic System Functional Test.” Specifically, with the 3‘A’ loop of RHR inoperable for automatic the low pressure coolant injection, on three separate occasions the operators did not verify compliance with Technical Specification 3.5.1. The first occurred when the 3'B’ RHR pump was also inoperable for approximately 30 minutes, the second was when the 3'D’ RHR pump was also inoperable for approximately 30 minutes and the third was when the 3'A’ core spray loop was also inoperable for approximately 40 minutes. Although all three occasions were contrary to the

requirements of Technical Specification 3.5.1, technical specifications were not violated since no required actions were missed during the time frames in which the additional subsystems were inoperable. The licensee entered this issue into their corrective action program as CR 00083213. This is being treated as a Non-Cited Violation.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

a. Key Points of Contact

Exelon Generation Company

G. Johnston, Plant Manager
E. Eilola, Shift Operations Superintendent
C. Hardee, Supervisor Emergency Preparedness
I. Seddon, Chemistry/Radwaste Manager
H. Trimble, Radiation Protection Manager
G. McCarty, Manager, Support Health Physics
W. Trump, Nuclear Security Manager
A. Winter, Manager, Regulatory Assurance

b. List of Items Opened, Closed, and Discussed

Closed

3-01-002-00	LER	Less than Adequate Test Review Results in Low Pressure Emergency Core Cooling Safety Function Degradation
2-97-009-01	LER	Unit 2 Reactor Scram Resulting from a Generator Lockout Condition and Subsequent Turbine Trip Failure of the 2A Reactor Feedpump
2-97-010-01	LER	Failure of the 2A Reactor Feedpump Turbine to Trip
2-99-006-01	LER	Engineered Safety Feature Actuations Following the Turbine Trip and the Requirements of 10 CFR 50.73 (a)(2)(i)(B) for Exceeding the Heatup Rate Specified by the Technical Specifications
3-99-002-01	LER	Failure to Maintain Alarmed Access Control to a Safeguards System Vital Area Door Upon Completion of Scheduled Maintenance

Opened/Closed

50-277;278/01-15-01	NCV	Licensee Did Not Adhere To Radiation Protection Procedures
50-277/01-15-02	NCV	Licensee Did Not Adhere To A Surveillance Test Procedure

c. List of Acronyms

CFR	Code of Federal Regulations
FSAR	Final Safety Analysis Report
HEPA	high efficiency particulate
ITS	Improved Technical Specifications
LER	Licensee Event Report
NEI	Nuclear Energy Institute
ODCM	Offsite Dose Calculation Model
RMS	radiation monitoring system
SCBA	self-contained breathing apparatus
SDP	significance determination process
SSC	system, structure, or component