



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

November 12, 2013

Mr. Joseph E. Pacher
Vice President
R.E. Ginna Nuclear Power Plant, LLC
Constellation Energy Nuclear Group, LLC
1503 Lake Road
Ontario, New York 14519

**SUBJECT: R.E. GINNA NUCLEAR POWER PLANT, LLC - NRC INTEGRATED
INSPECTION REPORT 05000244/2013004**

Dear Mr. Pacher:

On September 30, 2013, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your R.E. Ginna Nuclear Power Plant, LLC (Ginna). The enclosed integrated inspection report documents the inspection results, which were discussed on October 10, 2013, with you and other members of your staff.

The inspection examined 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.

This report documents one NRC-identified finding and one self-revealing finding of very low safety significance (Green). One finding was determined to involve a violation of NRC requirements. Additionally, a licensee-identified violation, which was determined to be of very low safety significance, is listed in this report. However, because of the very low safety significance, and because they are entered into your corrective action program, the NRC is treating these findings as NCVs, consistent with Section 2.3.2 of the NRC Enforcement Policy. If you contest any NCVs in this report, you should provide a response within 30 days of the date of this inspection report, with the basis of your denial, to the U.S. Nuclear Regulatory Commission, ATTN.: Document Control Desk, Washington DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at Ginna. In addition, if you disagree with the cross-cutting aspect assigned to any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region I, and the NRC Resident Inspector at Ginna.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Daniel L. Schroeder, Chief
Reactor Projects Branch 1
Division of Reactor Projects

Docket No. 50-244
License No. DPR-18

Enclosure: Inspection Report No. 05000244/2013004
w/Attachment: Supplementary Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No: 50-244

License No: DPR-18

Report No: 05000244/2013004

Licensee: Constellation Energy Nuclear Group, LLC (CENG)

Facility: R.E. Ginna Nuclear Power Plant, LLC (Ginna)

Location: Ontario, NY

Dates: July 1, 2013, through September 30, 2013

Inspectors: N. Perry, Senior Resident Inspector
D. Dodson, Resident Inspector
J. Laughlin, Emergency Preparedness Inspector
T. Moslak, Health Physicist
A. Rosebrook, Senior Project Engineer

Approved by: Daniel L. Schroeder, Chief
Reactor Projects Branch 1
Division of Reactor Projects

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SUMMARY

IR 05000244/2013004; 07/01/2013 – 09/30/2013; R.E. Ginna Nuclear Power Plant, LLC (Ginna); Maintenance Risk Assessments and Emergent Work Control; Follow-Up of Events and Notices of Enforcement Discretion.

This report covered a 3-month period of inspection by resident inspectors and announced inspections performed by regional inspectors. Inspectors identified two findings of very low safety significance (Green), one of which was a non-cited violation (NCV). A finding's significance is indicated by a color (i.e., greater than Green, or Green, White, Yellow, Red) and determined using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process (SDP)," dated June 2, 2011. Cross-cutting aspects are determined using IMC 0310, "Components Within the Cross-Cutting Areas," dated October 28, 2011. All violations of NRC requirements are dispositioned in accordance with the NRC's Enforcement Policy, dated July 9, 2013. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4.

Cornerstone: Initiating Events

- Green. A self-revealing Green finding was identified for inadequate guidance as required by Constellation Energy Nuclear Group, LLC (CENG) procedure CNG-PR-1.01-1005, "Control of Constellation Nuclear Generation Technical Procedure Format and Content," Revision 00500, for workers to implement a modification to the main generator protection digital relays. During the 2012 refueling outage (RFO), the protection relays' outputs were incorrectly configured to trip due to inadequate guidance given to the workers. This resulted in a main generator trip signal that led to a main turbine trip and a subsequent reactor trip during positive reactive capability testing on July 24, 2013.

This finding is more than minor because it is associated with the human performance attribute of the Initiating Events cornerstone and adversely impacted the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, Ginna procedures PRI-06-02-KVRELAY and PRI-26-02-GEN which were used to perform the maintenance and modification on the generator protective relays during the 2012 RFO, were not sufficient to ensure the relays were set correctly prior to the system being placed in service. This resulted in a plant trip when the set points for the incorrectly set generator trip relays were achieved during generator voltage testing. The inspectors evaluated the finding using IMC attachment 0609.04, "Initial Characterization of Findings," issued June 19, 2012. This attachment directed the inspectors to evaluate the finding using IMC 0609, Appendix A, "Significance Determination Process for Findings At-Power," issued June 19, 2012. The inspectors determined this finding did not cause both a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition (e.g. loss of condenser, loss of feedwater). Therefore, the inspectors determined the finding to be of very low safety significance (Green). This finding has a cross-cutting aspect in the area of Human Performance, Work Control, because CENG personnel did not appropriately coordinate work activities by incorporating actions to address the impact of changes to the work scope or activity on the plant and human performance. Specifically,

CENG personnel did not follow defined processes, such as the scope change process, to address the impact of changes to the work scope when implementing procedure changes to a modification to configure main generator digital protection relays [H.3.(b)]. (Section 4OA3)

Cornerstone: Mitigating Systems

- Green. The inspectors identified a Green NCV of Title 10 of the *Code of Federal Regulations* (10 CFR) 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," because CENG personnel did not accomplish activities affecting quality in accordance with documented procedures. Specifically, CENG personnel did not adequately implement scaffolding control procedural requirements to ensure that scaffolding did not block or restrict full operation of surrounding equipment or maintain 1-inch minimum clearances for safety-related equipment, which resulted in 13 deficiencies associated with scaffolding erection in the last year. CENG staff implemented immediate corrective actions by adjusting the scaffolding, removing the scaffolding, and/or evaluating the scaffolding. Additionally, these issues were documented in CENG's corrective action program (CAP).

The finding was more than minor because it was associated with the external factors and equipment performance attributes 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, CENG personnel did not follow procedural guidance when erecting scaffolding on 13 occasions during a 1-year period, which resulted in a fire protection suppression system being declared non-functional and the potential to affect other safety-related and fire protection equipment. Additionally, this issue is similar to example 4a described in IMC 0612, Appendix E, "Examples of Minor Issues," which states that this type of issue is not minor if a licensee routinely fails on similar issues. The inspectors evaluated the finding using IMC 0609, Attachment 0609.04, "Initial Characterization of Findings," issued June 19, 2012. The attachment instructs the inspectors to utilize IMC 0609, Appendix F, "Fire Protection Significance Determination Process," issued February 28, 2005, when the finding involves fixed fire protection systems; the most significant scaffolding issue impacted the S14 fixed fire protection system, which was declared non-functional. A low degradation rating was assigned to this finding because the S14 system was determined to be functional after a detailed analysis was performed, and S14 was still expected to display nearly the same level of effectiveness and reliability as it would have had the degradation not been present. Therefore, the inspectors determined the finding was of very low safety significance (Green). The finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because CENG personnel did not thoroughly evaluate problems such that the resolutions addressed causes. Specifically, CENG personnel had multiple opportunities following the inspectors' identification of scaffolding issues on October 25, 2012, and prior to August 15 and September 10, 2013, to thoroughly evaluate recent scaffolding problems such that the resolutions addressed causes [P.1(c)]. (Section 1R13)

Other Findings

A violation of very low safety significance that was identified by CENG was reviewed by the inspectors. Corrective actions taken or planned by CENG have been entered into CENG's CAP. This violation and corrective action tracking number are listed in Section 4OA7 of this report.

REPORT DETAILS

Summary of Plant Status

R.E. Ginna Nuclear Power Plant, LLC (Ginna) began the inspection period operating at full power. On July 24, 2013, the plant experienced a generator trip which resulted in an automatic reactor trip. Operators started up the reactor and brought it critical on July 27, and synchronized the generator to the grid on July 28. The plant was returned to full power on July 29, and operated at full power for the remainder of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection (71111.01 – 1 sample)

External Flooding

a. Inspection Scope

On May 29, 2013, August 6, 2013, September 5, 2013, and during the weeks of September 16 and September 23, 2013, the inspectors performed inspections of the external flood protection measures for Ginna. The inspectors reviewed technical specifications (TSs), procedures, design documents, and Updated Final Safety Analysis Report (UFSAR) Sections 2.4.2, "Floods," and 3.4.1, "Flood Protection," which depicted the design flood levels and protection areas containing safety-related equipment, to identify areas that may be affected by external flooding. The inspectors conducted a general site walkdown of all external areas of the plant, and the turbine building, auxiliary building, and specifically, manhole 1 and the 'B' battery room to ensure CENG personnel maintained flood protection measures in accordance with design specifications. The inspectors also reviewed operating procedures for mitigating external flooding during severe weather to determine if CENG staff planned or established adequate measures to protect against external flooding events. Documents reviewed for each section of this inspection report are listed in the Attachment.

b. Findings

Introduction. The inspectors identified an unresolved item (URI), because CENG staff did not adequately assess plant conditions or take appropriate actions to ensure equipment in the 'B' battery room would not be challenged by a design basis flood following the identification of unsealed penetrations between manhole 1 and the 'B' battery room and identification of clogged manhole drains. Specifically, no analysis existed to determine whether a design basis flood could have potentially impacted equipment in the 'A' and 'B' battery rooms via unsealed penetrations between manhole 1 and the 'B' battery room, and additional information and analysis is required to determine whether the issue of concern constitutes a violation of NRC requirements.

Description. On May 29, 2013, the east and west chambers of manhole 1 were opened to complete Fukushima flooding walkdown inspections of two penetrations. The east and west chambers of manhole 1 are located in the transformer yard on the east side of the plant directly adjacent to the control building. One penetration was between the east

chamber of manhole 1 and the 'B' battery room, and the other penetration was between the west chamber of manhole 1 and the 'B' battery room. During this inspection, which focused only on the penetrations, the inspectors and CENG personnel identified that the penetrations appeared to be unsealed and only contained ceramic fiber insulation. By May 31, CENG personnel determined that each chamber of manhole 1 also contained a drain. Condition report (CR)-2013-003407 documented these conditions and documented an assessment that assumed flow into the manhole chambers via the edges around and holes in the manhole covers. This assessment assumed 50.3 gallons per minute (gpm) of flow into each chamber of manhole 1 based on a flood height of 1.73 feet above the outside of the manhole. The assessment assumed that each drain was capable of passing 95 gpm of water. The CR noted that a walkdown of the floor drains was required to verify that the floor drains were as designed and capable of passing the calculation assumed flow rate.

The inspectors questioned the preventive maintenance frequency and previous testing of the drains and no licensee records could be located that indicated that the drains had ever been tested or cleaned. The inspectors were subsequently informed that the manhole drain inspections were not planned until October 2. The inspectors noted that Ginna had no definitive plans to seal the penetrations between manhole 1 and the 'B' battery room—only a potential enhancement action with a due date of December 1, 2014. Because the drains had never been inspected or tested, the inspectors expressed concerns to CENG personnel about the drains being clear and able to pass the assumed flows.

On September 5, CENG electricians were performing periodic manhole inspections—these inspections check for water in manhole chambers and pump it out, if necessary. The inspectors accompanied the electricians on this inspection. The inspectors captured photographs of substantial debris in both chambers of manhole 1 and both manhole 1 drains. In one chamber, a large sheet of plastic laid on the chamber floor among a layer of mud, rocks, and other debris. Other debris in one or both chambers of the manhole included large and small pieces of wood, 3-inch diameter pieces of foam, tie wraps, large nails and bolts, varying sizes of rocks and stones, rope, large pieces of hard plastic, wire, sticks, and tools. The photographs also documented likely water staining of the cinder block walls in both manhole chambers and significant debris was clearly visible in both drains. These photographs were shared with CENG management on September 5. CR-2013-005262 documented the debris in manhole 1, but stated that the condition could not affect operability of a structure, system, and component (SSC) and that the drain line would pass anticipated flow. The inspectors questioned this assessment and again expressed concern that the drains would not be capable of passing the necessary flow. Ginna took no additional immediate actions.

On September 17, CENG personnel were reviewing the photographs that the NRC inspectors provided on September 5 and determined that the manhole drains were missing their covers. At this point, the issue was elevated to a priority two work order (WO). Compensatory measures were also established to check the 5-day weather forecast and maintain plastic covers and sandbags over the manhole covers. Plans to test the drains and clean the manhole chambers were also expedited. Finally, a modification package was created to permanently seal the penetrations between manhole 1 and the 'B' battery room.

On September 20, CENG tested the manhole 1 drains to determine the flow rate the drains were capable of passing; neither drain was able to pass the amount of water needed to prevent water accumulation during testing. CR-2013-005643 documented that the drains failed to demonstrate the ability to pass the required flow and noted that the penetrations between manhole 1 and the 'B' battery room would be challenged. CENG management concluded that an unanalyzed condition existed due to unqualified battery room penetrations and partially blocked manhole chamber drains.

On September 30, CENG completed modification engineering change package (ECP) 13-000854, "Battery Room to Manhole 1 Penetrations Flood Barrier," Revision 0000, which installed permanent seals in both penetrations between manhole 1 and the 'B' battery room; thereby, the flooding concern was addressed.

Section 2.4.2.1, "Flood Design Considerations," of Ginna's UFSAR states that the plant is protected from a Deer Creek flood at an elevation of 273.8 feet, which is equivalent to a Deer Creek flood of 26,000 cubic feet per second. Section 3.4.1.1.3, "Deer Creek Flood Protection," states that a Deer Creek discharge of 26,000 cubic feet per second corresponds to an elevation of 272.0 feet on the north and east side of the plant. This is a flood height of approximately 2 feet in the transformer yard, where manhole 1 is located, because the general plant grade is approximately 270 feet.

At the end of the inspection period, CENG personnel were completing an apparent cause evaluation (ACE) focusing on the unqualified penetrations in the 'B' battery room, the clogged manhole 1 drains, and previous opportunities to identify and correct these conditions. CENG personnel were also conducting some additional flooding analyses to determine what, if any, safety-related equipment in the 'A' and 'B' battery rooms would be challenged by a design basis flood via the unqualified penetrations and what, if any, consequences would result.

This issue will be opened as a URI in order to review and evaluate CENG new flooding analyses, ACE, and other supporting documentation to determine if a violation exists with respect to the issue of concern of not adequately assessing plant conditions or taking appropriate actions to ensure equipment in the 'A' or 'B' battery room would not be challenged by a design basis flood. **(URI 05000244/2013004-01, Design Basis External Flooding and Unsealed Penetrations in the 'B' Battery Room)**

1R04 Equipment Alignment

Partial System Walkdowns (71111.04Q – 3 samples)

a. Inspection Scope

The inspectors performed partial walkdowns of the following systems:

- 'B' auxiliary feedwater (AFW) pump and the turbine-driven AFW pump during 'A' AFW pump planned maintenance on July 16 and 17, 2013
- 'A' residual heat removal (RHR) pump during 'B' RHR planned maintenance on August 28, 2013
- Motor-driven fire pump during diesel-driven fire pump planned maintenance on September 24, 2013

The inspectors selected these systems based on their risk-significance relative to the reactor safety cornerstones at the time they were inspected. The inspectors reviewed applicable operating procedures, system diagrams, the UFSAR, TSs, and the impact of ongoing work activities on redundant trains of equipment in order to identify conditions that could have impacted system performance of their intended safety functions. The inspectors also performed field walkdowns of accessible portions of the systems to verify system components and support equipment were aligned correctly and were operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no deficiencies. The inspectors also reviewed whether CENG staff had properly identified equipment issues and entered them into the CAP for resolution with the appropriate significance characterization.

b. Findings

No findings were identified.

1R05 Fire Protection

Resident Inspector Quarterly Walkdowns (71111.05Q – 6 samples)

a. Inspection Scope

The inspectors conducted tours of the areas listed below to assess the material condition and operational status of fire protection features. The inspectors verified that CENG controlled combustible materials and ignition sources in accordance with administrative procedures. The inspectors verified that fire protection and suppression equipment was available for use as specified in the area pre-fire plan, and passive fire barriers were maintained in good material condition. The inspectors also verified that station personnel implemented compensatory measures for out of service (OOS), degraded, or inoperable fire protection equipment, as applicable, in accordance with procedures.

- Intermediate building north basement on July 17, 2013
- Turbine building basement on July 17, 2013
- Standby AFW building on July 31, 2013
- Intermediate building main steam header floor on August 6, 2013
- Primary and secondary hydrogen storage buildings, radioactive waste building, outside construction areas, and the general yard inside the protected area on August 6, 2013
- 'B' emergency diesel generator (EDG) vault on August 7, 2013

b. Findings

No findings were identified.

1R06 Flood Protection Measures (71111.06 – 2 samples)Internal Flooding Reviewa. Inspection Scope

The inspectors reviewed the UFSAR, the site flooding analysis, and plant procedures to assess susceptibilities involving internal flooding. The inspectors also reviewed the CAP to determine if CENG personnel identified and corrected flooding problems and whether operator actions for coping with flooding were adequate. The inspectors also focused on the battery room and screen house areas to verify the adequacy of equipment seals located below the flood line, floor and water penetration seals, watertight door seals, common drain lines and sumps, sump pumps, level alarms, control circuits, and temporary or removable flood barriers.

b. Findings

No findings were identified.

1R11 Licensed Operator Regualification Program and Licensed Operator Performance (71111.11Q – 2 samples).1 Quarterly Review of Licensed Operator Regualification Testing and Traininga. Inspection Scope

The inspectors observed licensed operator simulator training on August 20, 2013, which included a steam generator tube leak, feedwater pump oil system failure, emergency safety features bus low voltage, and an atmospheric relief valve failing open. The inspectors evaluated operator performance during the simulated event and verified completion of risk significant operator actions, including the use of abnormal and emergency operating procedures. The inspectors assessed the clarity and effectiveness of communications, implementation of actions in response to alarms and degrading plant conditions, and the oversight and direction provided by the control room supervisor. The inspectors verified the accuracy and timeliness of the emergency classification made by the shift manager and the TS action statements entered by the shift technical advisor. Additionally, the inspectors assessed the ability of the crew and training staff to identify and document crew performance problems.

b. Findings

No findings were identified.

.2 Quarterly Review of Licensed Operator Performance in the Main Control Rooma. Inspection Scope

The inspectors observed operator response to the automatic reactor trip on July 24, 2013, and the subsequent plant startup on July 28 and 29. The inspectors observed briefings and reactivity control briefings to verify that the briefings met the criteria specified in CENG procedures CNG-OP-1.01-1000, "Conduct of Operations," Revision

01000, and CNG-OP-3.01-1000, "Reactivity Management," Revision 00800. Additionally, the inspectors verified that procedure use, crew communications, and coordination of activities between work groups similarly met established expectations and standards.

b. Findings

No findings were identified.

1R12 Maintenance Effectiveness (71111.12Q – 1 sample)

a. Inspection Scope

The inspectors reviewed the heater drain system on September 30, 2013, to assess the effectiveness of maintenance activities on SSC performance and reliability. The inspectors reviewed system health reports, CAP documents, and maintenance rule basis documents to ensure that CENG personnel were identifying and properly evaluating performance problems within the scope of the maintenance rule. For the sample selected, the inspectors verified that the SSC was properly scoped into the maintenance rule in accordance with 10 CFR 50.65 and verified that the (a)(2) performance criteria established by CENG staff were reasonable. As applicable, for SSCs classified as (a)(1), the inspectors assessed the adequacy of goals and corrective actions to return these SSCs to (a)(2). Additionally, the inspectors ensured that CENG staff was identifying and addressing common cause failures that occurred within and across maintenance rule system boundaries.

b. Findings

No findings were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13 – 6 samples)

a. Inspection Scope

The inspectors reviewed station evaluation and management of plant risk for the maintenance and emergent work activities listed below to verify that CENG personnel performed the appropriate risk assessments prior to removing equipment from service. The inspectors selected these activities based on potential risk significance relative to the reactor safety cornerstones. As applicable for each activity, the inspectors verified that CENG personnel performed risk assessments as required by 10 CFR 50.65(a)(4) and that the assessments were accurate and complete. When CENG personnel performed emergent work, the inspectors verified that operations personnel promptly assessed and managed plant risk. The inspectors reviewed the scope of maintenance work and discussed the results of the assessment with the station's probabilistic risk analyst to verify plant conditions were consistent with the risk assessment. The inspectors also reviewed the TS requirements and inspected portions of redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met.

- Planned maintenance on the 'A' motor-driven AFW system on July 17, 2013
- Planned maintenance on the 'B' EDG on August 7, 2013
- Planned undervoltage testing of buses 14 and 18 with the 'A' spent fuel pool heat exchanger OOS on August 13, 2013
- Elevated risk for 'A' EDG testing on August 15, 2013
- Elevated risk for turbine-driven AFW pump and lube oil reservoir suppression system S14 testing during reactor protection system channel three calibrations on August 19, 2013
- Planned troubleshooting on the turbine-driven AFW steam admission valves on August 20, 2013

b. Findings

Introduction. The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," because CENG personnel did not accomplish activities affecting quality in accordance with documented procedures. Specifically, CENG personnel did not adequately implement scaffolding control procedural requirements to ensure that scaffolding did not block or restrict full operation of surrounding equipment or maintain 1-inch minimum clearances for safety-related equipment, which resulted in 13 deficiencies associated with scaffolding erection in the last year.

Description. Since September 2012, the inspectors and CENG staff have identified 13 issues associated with scaffolding. Some of these issues resulted in fire protection equipment being declared non-functional and had the potential to affect safety-related equipment. The most significant scaffolding erection issue was identified by the inspectors on August 15, 2013, during a walkdown of protected equipment while the 'A' EDG was OOS for planned maintenance. The inspectors identified that scaffolding erected over the turbine-driven AFW lube oil system was impacting all four lube oil reservoir manual deluge system (S14) sprinkler heads. Section 5.2, "Scaffold Erection," of CNG-MN-1.01-1005, "Scaffold Control," Revision 00400, states, "When erecting scaffolding, all scaffolding components shall not block or restrict full operation of the surrounding equipment. All surrounding equipment shall have full operational capabilities. Examples include...fire suppression systems." Attachment 2, "General Scaffold Requirements," states, "Scaffold shall not block access to or prevent operation of fire protection and detection equipment (without prior approval by the Fire Department) and fire suppression systems such as water spray." On August 15, the scaffolding netting was blocking full operation of the S14 system and prior approval by the fire department had not been obtained. CENG staff declared the system non-functional, took immediate corrective action to correct the scaffolding, and documented the issue as CR-2013-004911. Subsequently, CENG staff performed a detailed past functionality analysis to define the specific function of the S14 system and determined that the system was functional but degraded.

On October 25, 2012, while the plant was in Mode 5 during a RFO, the inspectors identified that scaffolding was preventing the operation of the containment fire hose supply isolation valve 9227. Specifically, valve 9227, which is a credited containment isolation valve, was open and supplying the containment fire hoses, but the valve could not be closed, if necessary, because scaffolding next to the valve inhibited use of the valve operator. This is contrary to Section 5.2 of CNG-MN-1.01-1005, which states,

“When erecting scaffolding, all scaffolding components shall not block or restrict full operation of the surrounding equipment. All surrounding equipment shall have full operational capabilities. Examples include...valve operators.” Although the scaffolding requirements were not met, this containment isolation valve was not required to be operable while the plant was in Mode 5. CENG staff took immediate corrective action to change the scaffolding and documented the issue in the CAP as CR-2012-007401; the CR was closed with no additional action taken.

Following the containment isolation valve issue on October 25, 2012, there were a series of other scaffolding issues contrary to the requirements of Attachment 11, “Station-Specific Clearance and Bracing Requirements,” of CNG-MN-1.01-1005, which requires scaffolding to have a 1-inch minimum clearance for safety-related/trip-sensitive components or have a “configuration which has been evaluated and approved by Engineering.” On November 4, 2012, CENG staff identified metal scaffold decking in contact with safety significant reactor coolant system level indication sight glass LG-512; on July 26, 2013, CENG staff identified scaffolding in contact with conduit for the safety-related ‘A’ motor-driven AFW pump recirculation valve 4304; and on September 10, 2013, the inspectors identified two separate scaffoldings in contact with or within 1-inch of safety-related piping and conduit in the auxiliary building. Although none of these three scaffolding issues affecting safety-significant and safety-related systems and equipment created a reasonable doubt of component or system operability, these individual issues illustrated the programmatic issue of implementing the scaffolding control procedure and served as opportunities for CENG staff to thoroughly evaluate the problems such that the corrective actions addressed the causes and extent of conditions. In each of these instances, CENG staff implemented corrective actions by adjusting the scaffolding, removing the scaffolding, and/or evaluating the scaffolding. Additionally, these issues were documented in CR-2012-008066, CR-2013-004520, and CR-2013-005346.

Additional scaffolding issues that were identified in the last year also illustrated the programmatic issue of not meeting the requirements of CNG-MN-1.01-1005. These issues included scaffold planking within 18 inches of a sprinkler head for the turbine building island sprinkler system S26 (CR-2012-5928), scaffolding blocking two fire extinguishers (CR-2012-006814), scaffolding in contact with a mechanical snubber (CR-2012-007915), and five other instances of scaffolding in contact with non-safety-related piping and conduit (CR-2012-007128 and CR-2013-004520). None of these issues created a reasonable doubt of operability or functionality for any of the components or systems involved. In each case, CENG staff implemented corrective actions to correct or evaluate each individual scaffolding configuration.

After the inspectors identified the scaffolding issue associated with the S14 system on August 15, 2013, CENG staff documented a potential trend of issues associated with scaffolding builds (CR-2013-004962), and CENG’s quality performance and assessment (QPA) organization documented CR-2013-005072, “QPA-Finding-CR Weaknesses in Scaffold Control at Ginna Have Resulted in Deficiencies that Have Impacted Safety-Related Equipment.”

Analysis. The inspectors determined that CENG’s failure to meet the requirements of 10 CFR 50, Appendix B, and accomplish activities affecting quality in accordance with documented procedures was a performance deficiency that was within CENG’s ability to foresee and correct and should have been prevented. Specifically, CENG personnel did

not adequately implement scaffolding control procedural requirements to ensure that scaffolding did not block or restrict full operation of surrounding equipment or maintain 1-inch minimum clearance for safety-related equipment. The inspectors determined that the failure to follow procedural requirements was more than minor, because it was associated with the external factors and equipment performance attributes 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, CENG personnel did not follow procedural guidance when erecting scaffolding on 13 occasions during a 1-year period which resulted in a fire protection suppression system being declared non-functional and the potential to affect other safety-related and fire protection equipment. Additionally, this issue is similar to example 4a described in IMC 0612, Appendix E, "Examples of Minor Issues," which states that this type of issue is not minor if a licensee routinely fails on similar issues. The inspectors evaluated the finding using IMC Attachment 0609.04, "Initial Characterization of Findings," issued June 19, 2012. The attachment instructs the inspectors to utilize IMC 0609, Appendix F, "Fire Protection Significance Determination Process," issued February 28, 2005, when the finding involves fixed fire protection systems; the most significant scaffolding issue impacted the S14 fixed fire protection system, which was declared non-functional. A low degradation rating was assigned to this finding, because the S14 system was determined to be functional after a detailed analysis was performed, and S14 was still expected to display nearly the same level of effectiveness and reliability as it would have had the degradation not been present. Therefore, the inspectors determined the finding was of very low safety significance (Green).

This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because CENG personnel did not thoroughly evaluate problems such that the resolutions addressed causes. Specifically, CENG personnel had multiple opportunities following the inspectors' identification of scaffolding issues on October 25, 2012, and prior to August 15 and September 10, 2013, to thoroughly evaluate recent scaffolding problems such that the resolutions addressed causes [P.1(c)].

Enforcement. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented procedures and shall be accomplished in accordance with these procedures. CENG Procedure CNG-MN-1.01-1005, "Scaffold Control," Revision 00400, and its attachments, provide instruction pertaining to placing and building scaffolding structures, which includes ensuring that scaffolding neither blocks nor restricts full operation of the surrounding equipment and is built with a 1-inch minimum clearance for safety-related/trip-sensitive components or has a configuration that has been evaluated and approved by Engineering. Contrary to the above, on 13 occasions between October 25, 2012, and September 10, 2013, CENG personnel failed to adequately accomplish scaffolding builds and inspections in accordance with the requirements of CNG-MN-1.01-1005, "Scaffold Control," Revision 00400, to ensure that scaffolding did not block or restrict full operation of surrounding equipment or maintain 1 inch minimum clearance for safety related equipment. As a result, fire protection equipment for protected safety-related equipment was declared non-functional and other safety-related equipment could have been impacted. CENG staff implemented corrective actions by adjusting the scaffolding, removing the scaffolding, and/or evaluating the scaffolding. Because this violation is of very low safety significance and has been entered into

Ginna's CAP (CR-2012-5928, CR-2012-006814, CR-2012-007128, CR-2012-007401, CR-2012-007915, CR-2012-008066, CR-2013-004520, CR-2013-004911, CR-2013-004962, CR-2013-005072, and CR-2013-005346), this finding is being treated as an NCV consistent with Section 2.3.2 of the NRC Enforcement Policy. **(NCV 05000244/2013004-02, Failure to Implement Scaffolding Procedure Requirements)**

1R15 Operability Determinations and Functionality Assessments (71111.15 – 6 samples)

a. Inspection Scope

The inspectors reviewed operability determinations for the following degraded or non-conforming conditions:

- 'A' motor-driven AFW oil chemistry on July 24, 2013
- 'A' motor-driven AFW oil pump trip on July 25, 2013
- 'B' EDG load perturbations while unloading on August 1, 2013
- 'B' EDG control cabinet 83/DGB direct current (DC) throw-over relay response on August 7, 2013
- Turbine-driven AFW lube oil reservoir manual deluge system S14 impacted by scaffolding on August 15, 2013
- Buses 14, 16, 17, and 18 undervoltage control cabinet DC throw-over relays on September 12, 2013, following 'B' EDG control cabinet 83/DGB DC throw-over relay response on August 7, 2013

The inspectors selected these issues based on the risk significance of the associated components and systems. The inspectors evaluated the technical adequacy of the operability determinations to assess whether TS operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the TSs and UFSAR to CENG staff's evaluations to determine whether the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled by CENG personnel. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations.

b. Findings

No findings were identified.

1R18 Plant Modifications (71111.18 – 1 sample)

Permanent Modification

a. Inspection Scope

The inspectors evaluated a modification to two manhole 1 penetrations implemented by ECP 2013-000854, "Battery Room to Manhole 1 Penetrations Flood Barrier," Revision 0000. The inspectors verified that the design bases, licensing bases, and performance capability of the affected systems were not degraded by the modification. In addition,

the inspectors reviewed modification documents associated with the upgrade and design change, and interviewed engineering and maintenance personnel associated with the design change.

b. Findings

No findings were identified.

1R19 Post-Maintenance Testing (71111.19 – 5 samples)

a. Inspection Scope

The inspectors reviewed the post-maintenance tests for the maintenance activities listed below to verify that procedures and test activities ensured system operability and functional capability. The inspectors reviewed the test procedure to verify that the procedure adequately tested the safety functions that may have been affected by the maintenance activity, that the acceptance criteria in the procedure were consistent with the information in the applicable licensing basis and/or design basis documents, and that the procedure had been properly reviewed and approved. The inspectors also witnessed the test or reviewed test data to verify that the test results adequately demonstrated restoration of the affected safety functions.

- 'B' safety injection pump following planned maintenance on July 1, 2013
- 'A' motor-driven AFW following planned maintenance on July 18 and 19, 2013
- 'B' EDG following planned maintenance on August 7, 2013
- Standby spent fuel pool pump following planned maintenance on August 16, 2013
- Diesel fire pump following planned maintenance on September 26, 2013

b. Findings

No findings were identified.

1R20 Refueling and Other Outage Activities (71111.20 – 1 sample)

July 24, 2013, Forced Outage

a. Inspection Scope

On July 24, 2013, at 2:19 p.m., Ginna experienced an automatic reactor trip from full power during main generator reactive power testing. An alarm was expected while raising voltage during reactive power testing, but due to the incorrect configuration of the relays, a trip signal was generated, which tripped the main generator. The inspectors reviewed Ginna's implementation of forced outage plans and schedules to verify that risk, industry experience, previous site-specific problems, and defense-in-depth were considered. The inspectors observed operators stabilizing the plant after the trip, observed portions of the plant start-up process, and monitored controls associated with the following outage activities:

- Configuration management, including maintenance of defense-in-depth, commensurate with the outage plan for the key safety functions and compliance with the applicable TSs when taking equipment OOS
- Status and configuration of electrical systems and switchyard activities to ensure that TSs were met
- Monitoring of decay heat removal operations
- Activities that could affect reactivity
- Identification and resolution of problems related to outage activities

b. Findings

No findings were identified.

1R22 Surveillance Testing (71111.22 – 4 samples)

a. Inspection Scope

The inspectors observed performance of surveillance tests and/or reviewed test data of selected risk-significant SSCs to assess whether test results satisfied TSs, the UFSAR, and CENG procedure requirements. The inspectors verified that test acceptance criteria were clear, tests demonstrated operational readiness and were consistent with design documentation, test instrumentation had current calibrations and the range and accuracy for the application, tests were performed as written, and applicable test prerequisites were satisfied. Upon test completion, the inspectors considered whether the test results supported that equipment was capable of performing the required safety functions. The inspectors reviewed the following surveillance tests:

- STP-O-2.5.6, Air-Operated Valves (AOVs 5735, 5736, 5737, 5738) on July 18, 2013 (containment isolation valve)
- STP-O-12.1, Emergency Diesel Generator 'A' on July 19, 2013 (inservice test)
- STP-I-32A, Reactor Trip Breaker Testing – Train 'A' on July 22, 2013
- STP-O-36Q-D, Standby Auxiliary Feedwater Pump 'D' – Quarterly on July 31, 2013 (inservice test)

b. Findings

No findings were identified.

Cornerstone: Emergency Preparedness

1EP4 Emergency Action Level and Emergency Plan Changes (71114.04 – 1 sample)

a. Inspection Scope

Office of Nuclear Security and Incident Response staff performed an in-office review of the latest revisions of various emergency plan implementing procedures and the emergency plan located under ADAMS accession number ML13220A055.

CENG determined that in accordance with 10 CFR 50.54(q), the changes made in the revisions resulted in no reduction in the effectiveness of the plan and that the revised

plan continued to meet the requirements of 10 CFR 50.47(b) and 10 CFR Part 50 Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities." The NRC review was not documented in a safety evaluation report and did not constitute approval of licensee-generated changes; therefore, this revision is subject to future inspection.

b. Findings

No findings were identified.

1EP6 Drill Evaluation (71114.06 – 1 sample)

Training Observations

a. Inspection Scope

The inspectors observed a simulator training evolution for licensed operators on August 20, 2013, which required emergency plan implementation by an operations crew. CENG staff planned for this evolution to be evaluated and included in performance indicator data regarding drill and exercise performance. The inspectors observed event classification and notification activities performed by the crew. The inspectors also attended the post-evolution critique for the scenario. The focus of the inspectors' activities was to note any weaknesses and deficiencies in the crew's performance and ensure that CENG evaluators noted the same issues and entered them into the CAP.

b. Findings

No findings were identified.

2. RADIATION SAFETY

Cornerstone: Public Radiation Safety and Occupational Radiation Safety

2RS6 Radioactive Gaseous and Liquid Effluent Treatment (71124.06)

a. Inspection Scope

This area was inspected during the period from July 15 to 18, 2013, to evaluate whether the gaseous and liquid effluent processing systems were maintained so radiological discharges were properly reduced, monitored and evaluated, and to verify the accuracy of effluent releases resulting from radioactive effluent discharges.

Ground Water Protection Initiative (GPI) Program

The inspectors reviewed ground water monitoring results and changes to CENG's program for identifying, mitigating, and monitoring contaminated spills or leaks to on-site ground water pathways. The inspectors used the guidance contained in Nuclear Energy Institute (NEI) 07-07, "Industry Ground Water Protection Initiative – Final Guidance Document," to evaluate CENG's implementation of the GPI.

Walkdowns and Observations

The inspectors walked down the monitoring wells from which ground water samples were taken and analyzed for tritium. The inspectors reviewed CENG's measures to monitor and analyze ground water samples and the plans for installing additional monitoring wells to measure the effectiveness of the contamination controls.

The inspectors assessed the current on-site ground water sample results to determine the trends in the concentrations of titrated water in the monitoring wells.

The inspectors reviewed the decommissioning files per 10 CFR 50.75(g) to verify that any spills or leaks of contaminated material were documented and monitored.

Problem Identification and Resolution

The inspectors verified that problems associated with the GPI were being identified by CENG personnel at an appropriate threshold and were properly addressed for resolution in CENG's CAP.

b. Findings

No findings were identified.

2RS7 Radiological Environmental Monitoring Program (71124.07 – 1 sample)

a. Inspection Scope

From July 15 to 18, 2013, the inspectors verified that the radiological environmental monitoring program (REMP) quantifies the impact of radioactive effluent releases to the environment and sufficiently validates the radioactive gaseous and liquid release program.

Inspection Planning

The inspectors reviewed Ginna's annual radiological environmental operating reports for 2011 and 2012 and the results of licensee assessments since the last inspection to verify that the REMP was implemented and reported in accordance with requirements. This review included changes to the offsite dose calculation manual (ODCM) with respect to environmental monitoring, sampling locations, monitoring and measurement frequencies, land use census, the inter-laboratory comparison program, and analysis of data. The inspectors reviewed Ginna's ODCM to identify locations of environmental monitoring stations.

The inspectors reviewed the UFSAR for information regarding the environmental monitoring program and meteorological monitoring instrumentation. The inspectors reviewed quality assurance audits and technical evaluations performed on the vendor's analytical laboratory program.

The inspectors reviewed Ginna's annual radioactive effluent release reports and the most recent waste stream analyses to determine if CENG personnel were sampling and analyzing for the predominant radionuclide likely to be detected in the environment.

Site/Environmental Inspection

The inspectors walked down 12 air sampling stations (numbers 2 to 13) and 16 thermo luminescent dosimeter monitoring stations (numbers 2 to 13, 18, 19, 24, and 64) to determine whether they were located as described in the ODCM and to determine the equipment material condition. For the selected air samplers, the inspectors reviewed the calibration and maintenance records to verify the operability of the sampler's components. Additionally, the review included observation of the calibration verification of four composite water samplers.

The inspectors observed the collection and preparation of different environmental samples including drinking water (Monroe County Water Authority and Wayne County Water and Sewer Authority), surface water (Deer Creek, plant circulating water intake and discharge), vegetation (gardens in the east, east southeast, south southeast sectors in Hamlin, New York), and milk (Eaton and Schultz Farms) to verify that environmental sampling was representative of the release pathways as specified in the ODCM and that sampling techniques were in accordance with procedures.

The inspectors assessed whether CENG personnel had initiated sampling of other appropriate media when a new municipal facility was constructed; e.g., establishing drinking water sampling upon completion of the Webster water pumping station.

Based on direct observation and review of records, the inspectors assessed whether the meteorological instruments were operable, calibrated, and maintained in accordance with procedures. The inspectors assessed whether the meteorological data readout and recording instrument readings in the control room and at the primary and backup meteorological towers were operable and were in agreement. The inspectors confirmed that redundant instrumentation was available and that the recovery rate for meteorological data was greater than 90 percent.

The inspectors evaluated whether missed and/or anomalous environmental samples were identified and reported in the annual radiological environmental operating reports. The inspectors selected events that involved a missed sample, inoperable air sampler, lost thermo luminescent dosimeters, or anomalous measurements to verify that CENG personnel had identified the cause and had implemented corrective actions.

The inspectors reviewed any significant changes made by CENG to the ODCM as the result of changes in the land census, changes in long-term meteorological conditions, or modifications to the sampler stations since the last inspection. The inspectors reviewed technical justifications for any changed sampling locations to verify that CENG staff performed the reviews required to ensure that the changes did not affect its ability to monitor the impacts of radioactive effluent releases on the environment.

The inspectors assessed whether the detection sensitivities for environmental samples were below the lower limits of detection as required. The inspectors reviewed the results of the CENG inter-laboratory and intra-laboratory comparison program to verify the adequacy of environmental sample analyses performed by CENG staff. The inspectors assessed whether the results included the radionuclide mix appropriate for the facility.

Identification and Resolution of Problems

The inspectors verified that problems associated with the REMP were being identified by CENG personnel at an appropriate threshold and appropriate corrective actions were assigned for resolution in CENG's CAP.

b. Findings

No findings were identified.

4. **OTHER ACTIVITIES**

4OA1 Performance Indicator Verification (71151)

Mitigating Systems Performance Index (5 samples)

a. Inspection Scope

The inspectors reviewed CENG staff's submittal of the Mitigating Systems Performance Index (MSPI) for the following systems for the period of July 1, 2012, through June 30, 2013:

- Emergency Alternating Current (AC) Power System
- High Pressure Injection System
- Heat Removal System
- RHR System
- Cooling Water Systems

To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6. The inspectors also reviewed CENG's operator narrative logs, CRs, MSPI derivation reports, event reports, and NRC integrated inspection reports to validate the accuracy of the submittals.

b. Findings

No findings were identified.

4OA2 Problem Identification and Resolution (71152 – 1 sample)

.1 Routine Review of Problem Identification and Resolution Activities

a. Inspection Scope

As required by Inspection Procedure 71152, "Problem Identification and Resolution," the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that CENG staff entered issues into the CAP at an appropriate threshold, gave adequate attention to timely corrective actions, and identified and addressed adverse trends. In order to assist with the identification of repetitive

equipment failures and specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into the CAP and periodically attended CR screening meetings.

b. Findings

No findings were identified.

.2 Annual Sample: Identification, Control, and Correction of Combustible Material Conditions

a. Inspection Scope

The inspectors performed an in-depth review of CENG's ACEs and corrective actions associated with CR-2013-001829, which documents an adverse trend in transient combustible materials used and stored in the plant, and CR-2013-002895, which documents an NCV of Ginna's Operating License Condition 2.C.(3), "Fire Protection" (NCV 05000244/2013002-01). Specifically, there has been a trend of CRs documenting non-fire retardant treated wood being used, stored, and installed in plant areas in a manner contrary to FPS-16, "Bulk Storage of Combustible Materials and Transient Fire Loads," Revision 1700, and EPM-FPPR, "Ginna Station Fire Protection Program Report Volumes 1, 2 and 3," Revision 009.0. The inspectors assessed CENG's problem identification threshold, cause analyses, extent-of-condition reviews, compensatory actions, and the prioritization and timeliness of CENG's corrective actions to determine whether CENG personnel were appropriately identifying, characterizing, and correcting problems associated with this issue and whether the planned or completed corrective actions were appropriate. The inspectors compared the actions taken to the requirements of CENG's CAP and 10 CFR 50, Appendix B. In addition, the inspectors performed field walkdowns and interviewed engineering, performance improvement, and licensing personnel to assess the effectiveness of implemented corrective actions.

b. Findings and Observations

No findings were identified.

CENG determined the apparent cause of the adverse trend in transient combustible materials used and stored in the plant was limited training on the impacts of transient combustible material. CENG also determined that the combustible material storage requirements and expectations for planning and the maintenance shops were not well known. Corrective actions included presenting the risks and hazards associated with transient combustible material use and storage in the plant in a station update and performing a transient combustible prevention "road show" to all work groups and shops.

On March 26, 2013, prior to the completion of the corrective actions associated with the adverse trend in transient combustible materials used and stored in the plant, the inspectors identified that non-fire retardant treated wood was being inappropriately used in the 'B' battery room as part of a scaffolding build in the area. CENG personnel had installed a piece of 18 by 96 by 0.5-inch non-fire retardant treated wood on top of the back row of the 'B' battery. This wood was oriented such that three credible fixed ignition sources could ignite it; however, this issue was minor because analysis showed that ignition of the prohibited and uncontrolled transient combustibles would not have led

to a full compartment burn of the 'B' battery room or impacted other equipment important to safety. CENG personnel took immediate corrective actions and removed the non-fire retardant treated wood, documented the issue as CR-2013-002803, and identified and removed all non-fire retardant treated wood from the site's wood storage area.

Corrective actions to address the NCV of Ginna's Operating License Condition 2.C.(3), "Fire Protection" (NCV 05000244/2013002-01)—which documented CENG's failure to identify, account for, and evaluate non-fire retardant treated plywood and other combustibles in the screen house building (Fire Zone SH-2)—included an action to track the completion of extent-of-condition walkdowns in other areas applicable to the combustible loading analysis to identify and rectify other unanalyzed, permanently installed combustible wood or materials. Corrective action CA- 2013-001334 was created to track the completion of these walkdowns, and CR-2013-002485 was created to track the completion of corrective action CA-2013-001334. Corrective action CA-2013-000952 was created to track the performance of a walkdown of the control complex, elevation 271 feet 0 inches (the relay room), to document any permanently installed wood; this walkdown was completed on April 29, 2013. CA-2013-000946 was created to track the performance of a walkdown of the intermediate building cold basement, elevation 253 feet 6 inches, to document any permanently installed wood; this walkdown was completed on June 24.

On September 4 and 5, 2013, CENG personnel identified more than 72.6 pounds of wood in the relay room (Fire Zone RR) and documented the conditions in CR-2013-005244, CR-2013-005263, and CR-2013-005264. CENG has planned corrective actions to account for the wood in the combustible loading analysis and/or remove the wood. On September 29, 2013, CENG identified a small amount of wood in the intermediate building cold basement (Fire Zone IBN-1) and documented the condition in CR-2013-005718. CENG has planned corrective actions to account for the wood in the combustible loading analysis and to remove the wood. Each of the CENG-identified issues was a condition unaccounted for in the site's combustible loading analysis. However, these issues were determined to be minor, because they did not involve credible fire scenarios, the combustibles were not in combustible free zones, and the quantities of combustibles were negligible.

The inspectors identified that the corrective actions (CA-2013-000946 and CA-2013-000952), to create and track the performance of extent-of-condition walkdowns in areas applicable to the combustible loading analysis for identification and rectification of other unanalyzed permanently installed combustible wood or materials, were not fully effective. CENG entered the inspector's observations into its CAP as CR-2013-005726.

In accordance with IMC 0612, "Power Reactor Inspection Reports," issued January 24, 2013, the above issues constituted violations of minor significance that are not subject to enforcement action in accordance with NRC Enforcement Policy

40A3 Follow-Up of Events and Notices of Enforcement Discretion (71153 – 2 samples)

.1 (Closed) Licensee Event Report (LER) 05000244/2013-001-00: Unanalyzed Condition Due to Missing Barrier

On April 12, 2013, a system engineer performing a walkdown of backflow prevention devices discovered that the check valve that was expected to be found installed in a

floor drain in the intermediate building basement had been removed. The check valve was designed as a barrier to prevent the flow of flammable liquid from the turbine building basement to the intermediate building basement where safe shutdown equipment is located. CENG took immediate compensatory actions to install a plug in the floor drain and conduct an hourly fire watch. CENG staff also verified this drain was not credited for flood mitigation. CENG entered the issue into its CAP as CR-2013-002437 and conducted an ACE. It is believed the check valve had been removed in error due to housekeeping issues it had created. CENG personnel conducted an appropriate extent-of-condition review of other similar backflow prevention devices credited in their fire protection program. There were no actual safety consequences associated with this event. The enforcement aspects of this issue are discussed in Section 4OA7. The inspectors did not identify any new issues during the review of this LER. This LER is closed.

.2 (Closed) LER 05000244/2013-002-00: Reactor Trip Due to Generator Trip During Main Generator Reactive Power Testing

a. Inspection Scope

For the July 24, 2013, plant trip, the inspectors reviewed and/or observed plant parameters, reviewed personnel performance, and evaluated performance of mitigating systems. The inspectors communicated the plant events to appropriate regional personnel, and compared the event details with criteria contained in IMC 0309, "Reactive Inspection Decision Basis for Reactors," for consideration of potential reactive inspection activities. As applicable, the inspectors verified that CENG made appropriate emergency classification assessments and properly reported the event in accordance with 10 CFR Parts 50.72 and 50.73. The inspectors reviewed CENG's follow-up actions related to the events to assure that CENG staff implemented appropriate corrective actions commensurate with their safety significance. The enforcement actions associated with this LER are discussed below. This LER is closed.

b. Findings and Observations

Introduction. A self-revealing Green finding (FIN) was identified for inadequate modification implementation guidance as required by CENG procedure CNG-PR-1.01-1005, "Control of Constellation Nuclear Generation Technical Procedure Format and Content," Revision 00500. Specifically, during the 2012 RFO, the main generator digital protection relays' outputs were incorrectly configured to trip due to inadequate guidance given to the workers. This resulted in a main generator trip signal that led to a main turbine trip and a subsequent reactor trip during positive reactive capability testing on July 24, 2013.

Description. On July 24, the plant automatically tripped due to a main generator trip followed by a main turbine trip during performance of O-6.9.4, "Positive Reactive Capability Testing," Revision 00601. During this testing, voltage was increased incrementally on the main generator. The main generator was expected to actuate an alarm when the relay voltage set points were reached. However, since the relay trip was incorrectly set to actuate at this same voltage, the generator received a trip signal. The generator trip led to a main turbine trip and a subsequent reactor trip. Plant operators took appropriate actions to stabilize the unit following this uncomplicated reactor trip.

During the 2011 RFO, new main generator digital protection relays were installed at Ginna using the modification process. The plant was operated for one cycle with the relays configured to alarm only (the trip functions were not enabled) as a confidence run prior to enabling the trip functions. The trip functions were planned to be enabled during the 2012 RFO at a set point higher than the alarm set point. However, during the 2012 RFO, the relays were incorrectly configured to generate an alarm and trip signal at the same voltage set point. Procedures PRI-06-02-KVRELAY, "Protective Relay Calibration 19 KV and 115 KV Relaying," Revision 00300, and PRI-26-02-GEN, "Protective Relay Trip Test 19 KV and 115 KV Relaying," Revision 01001, were used to perform the maintenance and modification on the relays during the 2012 RFO. Steps were added to these procedures that required the trip outputs to be confirmed or ensured enabled; no other direction was given. This inadequate guidance resulted in the relay trips being enabled at the same voltage as the alarm set point. Corrective actions included disabling the trip functions of the relays, quarantining the procedures used to enable the trip functions during the 2012 RFO, and initiating CR-2013-004461.

CENG management completed a root cause analysis in order to determine the root and contributing causes and to propose corrective actions. The root cause was determined to be a lack of rigor in implementing processes within engineering, maintenance, and work management resulting in procedural guidance with insufficient detail to ensure the relays were properly configured. Several defined processes were not rigorously followed including: the normal modification process, the process for briefing two newly assigned engineers to the modification, the scope change process, the procedure change process, and the preventive maintenance change request process. Contributing causes included lack of adequate supervision and knowledge shortfalls.

CENG procedure CNG-PR-1.01-1005 established the standards for technical procedure format and content including maintenance procedures. This procedure also stated that steps are to be ensured factual, concise, and not susceptible to misinterpretation. Additionally, process steps are written so that activities provide enough information in sufficient detail for a qualified individual to perform the required task without supervision.

Analysis. The performance deficiency associated with this finding was that Ginna procedures PRI-06-02-KVRELAY and PRI-26-02-GEN did not meet the standards established in CENG's procedure writing guide. Specifically, steps were added to the procedures to properly configure the relays during the RFO. These procedure steps required that the relay trip outputs be confirmed or ensured enabled, but no other direction was given. As a result, the relays were incorrectly configured, which ultimately led to a plant trip when the set points for the relays were achieved during generator voltage testing.

This finding is more than minor because it is associated with the human performance attribute of the Initiating Events cornerstone and adversely impacted the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, Ginna procedures PRI-06-02-KVRELAY and PRI-26-02-GEN, which were used to perform the maintenance and modification on the generator protective relays during the 2012 RFO, were not factual, concise, and not susceptible to misinterpretation. This resulted in a plant trip when the set points for both the relays' alarm and trip functions were achieved during generator voltage testing. The inspectors evaluated the finding using IMC 0609, attachment 0609.04, "Initial Characterization of Findings," issued June 19, 2012. This

attachment directed the inspectors to evaluate the finding using IMC 0609, Appendix A, "Significance Determination Process for Findings At-Power," issued June 19, 2012. The inspectors determined this finding did not cause both a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition (e.g. loss of condenser, loss of feedwater). Therefore, the inspectors determined the finding to be of very low safety significance (Green).

This finding has a cross-cutting aspect in the area of Human Performance, Work Control, because CENG personnel did not appropriately coordinate work activities by incorporating actions to address the impact of changes to the work scope or activity on the plant and human performance. Specifically, CENG personnel did not follow defined processes, such as the scope change process, to address the impact of changes to the work scope when implementing procedure changes to a modification to configure main generator digital protection relays [H.3.(b)].

Enforcement. Ginna procedures used to perform the maintenance and modification on the generator protective relays during the 2012 RFO did not meet the standards established in CNG-PR-1.01-1005. This issue was entered into CENG's CAP as CR-2013-004461. This finding does not involve enforcement action because no violation of a regulatory requirement was identified. Because this finding does not involve a violation and is of very low safety significance, it is identified as a FIN.

(FIN 05000244/2013004-03, Inadequate Guidance for Workers to Implement a Modification to the Main Generator Digital Protection Relays)

40A6 Meetings, Including Exit

On October 10, 2013, the inspectors presented the inspection results to Mr. Joseph Pacher, Vice President, and other members of the Ginna staff. The inspectors verified that no proprietary information was retained by the inspectors or documented in this report.

40A7 Licensee-Identified Violations

The following violation of very low safety significance (Green) was identified by CENG and is a violation of NRC requirements which meets the criteria of the NRC Enforcement Policy for being dispositioned as an NCV.

- Ginna Operating License Condition 2.C.(3), "Fire Protection," requires Ginna to implement and maintain in effect all fire protection features described in the licensee's submittals referenced in and as approved or modified by the NRC's Fire Protection Safety Evaluation supplement dated December 17, 1980. The Fire Protection Safety Evaluation supplement contained a requirement for a backflow prevention check valve in the intermediate building basement. Contrary to License Condition 2.C.(3), on April 12, 2013, CENG personnel identified that the check valve, a required fire protection feature, had been removed. CENG personnel entered the issue into its CAP as CR-2013-002437. The inspectors determined that the finding was of very low safety significance (Green) in accordance with IMC 0609, Appendix F, "Fire Protection Significance Determination Process," issued February 28, 2005. The finding is considered to be in the fire confinement area and was assigned a

moderate degradation rating. Per IMC 0609, Appendix F, Task 1.3.2, "Supplemental Screening for Fire Confinement Findings," this finding screens to Green because there was a non-degraded, automatic, full- area, water-based fire suppression system in the exposing fire area.

ATTACHMENT: SUPPLEMENTARY INFORMATION

SUPPLEMENTARY INFORMATION**KEY POINTS OF CONTACT**Licensee Personnel

J. Pacher, Vice President, Ginna
 M. Philippon, Plant General Manager
 J. Bowers, General Supervisor, Radiation Protection
 S. Doty, Manager, Maintenance
 L. Edwards, General Supervisor, Chemistry
 K. Garnish, General Supervisor, Operations Support
 M. Geckle, Manager, Nuclear Safety and Security
 T. Harding, Director, Licensing
 J. Jackson, Supervisor, Engineering
 D. Markowski, General Supervisor, System Engineering
 T. Mogren, Manager, Engineering Services
 T. Paglia, Manager, Operations
 J. Scalzo, Director, Emergency Preparedness
 J. Wayland, General Supervisor, Asset Management
 S. Wihlen, Manager, Integrated Work Management

LIST OF ITEMS OPENED, CLOSED, DISCUSSED, AND UPDATEDOpened/Closed

05000244/2013004-02	NCV	Failure to Implement Scaffolding Procedure Requirements (Section 1R13)
05000244/2013004-03	FIN	Inadequate Guidance for Workers to Implement a Modification to the Main Generator Digital Protection Relays (Section 4OA3)

Opened

05000244/2013004-01	URI	Design Basis External Flooding and Unsealed Penetrations in the 'B' Battery Room (Section 1R01)
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Closed

05000244/2013-001-00	LER	Unanalyzed Condition Due to Missing Barrier (Section 4OA3)
05000244/2013-002-00	LER	Reactor Trip Due to Generator Trip During Main Generator Reactive Power Testing (Section 4OA3)

LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

Procedures

CNG-CA-1.01-1000, Corrective Action Program, Revision 00902
CNG-OP-1.01-1002, Conduct of Operability Determinations/Functionality Assessments,
Revision 00201
ER-SC.2, High Water (Flood) Plan, Revision 00802
ER-SH.1, Response to Loss of Screen House, Revision 00201

Drawings

33013-0025, Control Cable Manhole #1 Top, Bottom Slab, Sidewalls & Details, Revision E
33013-2681, Sump Pumps, Drains, and Sewage Pumps Piping and Instrumentation Drawing
(P&ID), Revision 13

Condition Reports

CR-2013-003407
CR-2013-005262
CR-2013-005470
CR-2013-005643
CR-2013-005962

Work Orders

WO C92024716
WO C92304679

Miscellaneous

Walkdown Record Form, Penetrations from Manhole 1 to Battery Rooms, May 30, 2013

Section 1R04: Equipment Alignment

Procedures

STP-O-13, Fire Pump Operation and System Alignment, Revision 00200
STP-O-30.2, RHR System Valve and Breaker Position Verification, Revision 00001
STP-O-30.4, Auxiliary Feedwater System Valve and Breaker Position Verification, Revision 00400

Drawings

33013-1237, Auxiliary Feedwater P&ID, Revision 067
33013-1247, Auxiliary Coolant Residual Heat Removal, Revision 46
33013-1989, Fire Protection Systems Fire Service Water Plant Systems, Revision 27
33012-2285, Motor-Driven and Turbine-Driven Auxiliary Feedwater Pumps Lube Oil Skid P&ID,
Revision 020

Section 1R05: Fire Protection

Procedures

A-54.7, Fire Protection Tour, Revision 03402
FRP-12.0, Intermediate Building Main Steam Header Floor, Revision 00801
FRP-25.0, Diesel Generator Room 'B' and Vault, Revision 00800
FRP-35.0, Standby Auxiliary Feedwater Building, Revision 00601
SC-3.15.3, Portable Extinguisher Inspection, Revision 023

Drawings

21488-0100, Fire Barrier General Arrangement Sheet Fire, Smoke, and Pressure Barriers Plan
View Elevation 253 feet 6 inches, Revision 13, Sheet 4
21488-0111, Fire Barrier General Arrangement Sheet Diesel Generator Room 'B' Vault North
Wall Penetration Locations Floor Elevation 244 feet 0 inches, Revision 4, Sheet 3
21488-0111, Fire Barrier General Arrangement Sheet Diesel Generator Room 'B' Vault
South and West Walls Penetration Locations Floor Elevation 244 feet 0 inches,
Revision 5, Sheet 4
33013-1537, 1B Diesel Generator Cable Vault Appendix R Cable Chase Fire Barrier, Revision 4
33013-2540, Fire Response Plan General Plant Drawing Index and Symbol Legend, Revision 8
33013-2541, Fire Response Plan General Site Hydrant Piping and Fire Matrix, Revision 13
33013-2544, Fire Response Plan Turbine Building Plan – Basement Floor Elevation 253 feet
6 inches, Revision 13
33013-2551, Fire Response Plan Containment Structure and Intermediate Building Plan –
Operating Floor, Elevation 278 feet 4 inches and 274 feet 6 inches
33013-2552, Fire Response Plan Auxiliary Building Plan – Operating Floor Elevation 271 feet
0 inches, Revision 8
33013-2579, Fire Response Plan Upper Radwaste Storage Building Plan – Grade, Revision 2
33013-2580, Fire Response Plan Transformer Yard Plan – Elevation 270 feet 0 inches,
Revision 5

Condition Reports

CR-2013-004684
CR-2013-004725
CR-2013-004732

Work Order

WO C91963878

Miscellaneous

DA-ME-98-004, Combustible Loading Analysis, Revision 11
DA-ME-2002-005, Primary and Secondary Hydrogen Storage Buildings NFPA 50A Code Review,
Revision 0
Drawings of Ginna Sprinklers, Smoke, and Heat Detectors (Zones S14, S15, S24, S25, and S27)
EPM-FPPR, Ginna Station Fire Protection Program Report Volumes 1, 2 and 3, Revision 009.0
Letter from Robert C. Mecredy to Robert L. Clark, Ginna Station Hydrogen Storage Facility Risk
Vulnerabilities, June 5, 2002
Tagout 65-0038, Replace the MOP, Motor Operator Potentiometer, August 7, 2013

Section 1R06: Flood Protection Measures

Procedures

ER-SC.2, High Water (Flood) Plan, Revision 00802

M-95, Annual Inspection and Operational Check of Backflow Protection System, Revision 01301

Drawings

33013-0468, Mechanical Equipment for Circulating Water Flood Protection, Revision C

33013-2681, Sump Pumps, Drains, and Sewage Pumps P&ID, Revision 13

Condition Reports

CR-2013-005331

CR-2013-005460

Miscellaneous

White Paper Response to NRC Questions, August 28, 2013

Section 1R11: Licensed Operator Requalification Program and Licensed Operator Performance

Procedures

CNG-OP-1.01-1000, Conduct of Operations, Revision 01000

CNG-OP-3.01-1000, Reactivity Management, Revision 00800

Condition Report

CR-2013-005002

Miscellaneous

SEG-13-5-1, Simulator Fundamental Assessment and Evaluation for Individual Operators and Operating Shifts, CPE-7 on August 20, 2013

Section 1R12: Maintenance Effectiveness

Procedures

CNG-AM-1.01-1023, Maintenance Rule Program, Revision 00201

EP-3-S-0308, Maintenance Rule Scoping, Revision 00902

Condition Reports

CR-2012-007133

CR-2013-000947

Miscellaneous

MRule Manager Database

Section 1R13: Maintenance Risk Assessments and Emergent Work Control

Procedures

CNG-CA-1.01-1000, Corrective Action Program, Revision 00902

CNG-MN-1.01-1005, Scaffold Control, Revision 00400

CNG-OP-1.01-1002, Conduct of Operability Determinations/Functionality Assessments, Revision 00201

CNG-OP-1.01-GL012, Equipment Protection Guideline, Revision 00100
 CNG-OP-4.01-1000, Integrated Risk Management, Revision 01300
 OPG-AUTO-SOFTWARE, Control Room Software Operation, Revision 02300
 OPG-IWS-SUPPORT, Operations Support of the Integrated Work Schedule, Revision 10004
 OPG-IWS-SUPPORT, Operations Support of the Integrated Work Schedule, Revision 10005
 OPG-IWS-SUPPORT, Operations Support of the Integrated Work Schedule, Revision 10006
 OPG-IWS-SUPPORT, Operations Support of the Integrated Work Schedule, Revision 10007
 OPG-IWS-SUPPORT, Operations Support of the Integrated Work Schedule, Revision 10008
 OPG-PROTECTED EQUIPMENT, Operations Protected Equipment Program, Revision 00503
 STP-O-13.4.6, Flood Valve Testing-Suppression System S14 Turbine-Driven Aux Feedwater Pump and Turbine Lube Oil Reservoir Manual Deluge, Revision 00002

Condition Reports

CR-2012-004695	CR-2012-008066	CR-2013-004983
CR-2012-005928	CR-2012-008314	CR-2013-005072
CR-2012-006814	CR-2013-002803	CR-2013-005346
CR-2012-007128	CR-2013-004520	CR-2013-005411
CR-2012-007401	CR-2013-004911	
CR-2012-007915	CR-2013-004962	

Work Orders

WO C91941933
 WO C91975270
 WO C91975272

Miscellaneous

CR-2013-001734 Troubleshooting Control Form, 'A' Steam Admission Valve, 3505A
 Troubleshooting, August 20, 2013
 EPM-FPPR, Ginna Station Fire Protection Program Report Volumes 1, 2, and 3, Revision 009.0
 SP-2013-0094, Scaffold Control Form, August 13, 2013

Section 1R15: Operability Determinations and Functionality Assessments

Procedures

CNG-CA-1.01-1005, Apparent Cause Evaluation, Revision 00603
 CNG-MN-1.01-1002, Troubleshooting, Revision 00100
 CNG-MN-1.01-1005, Scaffold Control, Revision 00400
 CNG-OP-1.01-1002, Conduct of Operability Determinations/Functionality Assessments,
 Revision 00201
 CNG-OP-1.01-1009, Monitoring and Contingency Planning for Abnormal Conditions,
 Revision 00100
 ER-D/G.1, Restoring D/Gs, Revision 01800
 ER-ELEC.1, Restoration of Offsite Power, Revision 01801
 STP-E-11.3, DC Throw-Over Switch Verification and Bus Undervoltage System Testing,
 Revision 00200

Drawings

10909-35, Bus 17 and Bus 18 Undervoltage Control, Revision 4
 33013-1130, 125 Volt Automatic and Manual Throw-Over Diagram, Revision 8

Condition Reports

CR-2005-3155	CR-2013-001066	CR-2013-004730
CR-2006-0719	CR-2013-001807	CR-2013-004804
CR-2007-005627	CR-2013-003767	CR-2013-004911
CR-2012-001043	CR-2013-003885	CR-2013-005107
CR-2012-003600	CR-2013-004502	CR-2013-005219
CR-2012-005928	CR-2013-004633	CR-2013-005753

Miscellaneous

EPM-FPPR, Ginna Station Fire Protection Program Report Volumes 1, 2, and 3, Revision 009.0
 Management Review Committee Review Summary Report, Screened on August 9, 2013
 Plant Health Committee Meeting Minutes, August 13, 2013
 Procurement Requirement Evaluation for 12334, Revision 0
 Self-Assessment 2013-000023
 VTD-P0297-4402, Potter and Brumfield Relays, Revision 000

Section 1R18: Plant Modifications

Condition Reports

CR-2013-003407
 CR-2013-005262
 CR-2013-005470
 CR-2013-005643

Work Orders

WO C92304679
 WO C92428057
 WO C92431691

Miscellaneous

ECP 13-000854, Battery Room to Manhole 1 Penetrations Flood Barrier, Revision 0000

Section 1R19: Post-Maintenance Testing

Procedures

STP-O-2.1QB, Safety Injection Pump 'B' Quarterly Test, Revision 00700
 STP-O-12.2, Emergency Diesel Generator 'B', Revision 01200
 STP-O-13, Fire Pump Operation and System Alignment, Revision 00200
 STP-O-13.2, Diesel Fire Pump Standard Protection Test, Revision 00000
 STP-O-16-COMP-A, Auxiliary Feedwater Pump 'A' Comprehensive Test, Revision 00702
 STP-O-33D, Spent Fuel Pool Standby Pump, Revision 00000

Condition Reports

CR-2006-004662	CR-2011-007749
CR-2009-006465	CR-2013-004736
CR-2011-000678	CR-2013-004948
CR-2011-001012	CR-2013-004953

Work Orders

WO C91713377
WO C92377706

Miscellaneous

Procedure Change Request 13-04370

Section 1R20: Refueling and Other Outage Activities

Procedures

CNG-OP-1.01-1006, Post Trip Reviews, Revision 00200
ES-0.1, Reactor Trip Response, Revision 02903

Condition Reports

CR-2013-004461
CR-2013-004477
CR-2013-004512
CR-2013-004528

Miscellaneous

Technical Evaluation – July 24, 2013, Reactor Trip

Section 1R22: Surveillance Testing

Procedures

STP-I-32A, Reactor Trip Breaker Testing – Train 'A', Revision 00300
STP-O-2.5.6, Air-Operated Valves – Quarterly Surveillance (AOVs 5735, 5736, 5737, 5738),
Revision 00201
STP-O-12.1, Emergency Diesel Generator 'A', Revision 01401
STP-O-36Q-D, Standby Auxiliary Feedwater Pump 'D' – Quarterly, Revision 00500

Drawing

33013-1238, Standby Auxiliary Feedwater P&ID, Revision 26

Condition Report

CR-2013-004627

Work Order

WO C91941945

Section 1EP4: Emergency Action Level and Emergency Plan Changes

Procedure

EPIP-2-1, Protective Action Recommendations, Revision 29

Miscellaneous

Nuclear Emergency Response Plan, Revision 34

Section 1EP6: Drill Evaluation

Miscellaneous

SEG-13-5-1, Simulator Fundamental Assessment and Evaluation for Individual Operators and Operating Shifts, CPE-7 on August 20, 2013

2RS6: Radioactive Gaseous and Liquid Effluent Treatment

Procedures

CH-261, Collection and Analysis of Ground Water Samples, Revision 00600
CH-520, Operation of Tri-Carb Liquid Scintillation Analyzer, Revision 00100
CH-521, Calibration of Tri-Carb Liquid Scintillation Analyzer, Revision 00000
CNG-EV-1.01-1001, Radiological Ground Water Protection Program, Revision 00100

Miscellaneous

2013 Ground Water Monitoring Well Tritium Sample Results
Ginna Ground Water Protection Program Consultant's Report
NEI 07-07, Industry Ground Water Protection Initiative – Final Guidance Document
Self-Assessment SA-2013-000064, Ground Water Monitoring Program

2RS7: Radiological Environmental Monitoring Program

Procedures

CH-155, Chemistry Radiological Environmental Monitoring Program, Revision 00201
CH-ENV-AIR, Collection and Calculation of Beta Activity for Environmental Air Samples, Revision 00904
CH-ENV-MILK, Collection of Milk Samples, Revision 00600
CH-ENV-TRANS, Preparation and Shipment of Environmental Samples to Vendor Lab, Revision 00502
CH-ENV-VEG, Collection of Vegetation Samples, Revision 00500
CH-ENV-WATER, Collection of Water Samples, Revision 02001
CH-RETS-MET, Meteorological System Surveillance, Revision 00503
CHA-ENV-TECH, Duties of Environmental Surveillance Technician, Revision 00501
CNG-EV-1.01-1000, Radiological Environmental Monitoring Program (REMP), Revision 00100
CPI-MET-250, Calibration of Ginna Station Meteorological Wind Speed and Wind Direction Translator Cards, Revision 00800
CPI-MET-251.1, Calibration of Ginna Station Meteorological Temperature Instrumentation, Revision 00800
CPI-MET-251.2, Removal, Check and Installation of Ginna Station Meteorological Instrumentation, Revision 01501
CPI-MET-251.3, Calibration of Ginna Station Meteorological Power Supplies, Records, Control Room Temperature Indicators, Revision 01102
CPI-MET-251.4, Calibration of Station 13A Meteorological Instruments, Revision 00501
GMM-11-15-GAST/322/3, Rotary Air Sampler Inspection and Maintenance for Environmental Monitor Units, Revision 01300

Condition Reports

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CR-2012-002378	CR-2013-001038	CR-2013-003910
CR-2012-006401	CR-2013-001341	CR-2013-002909
CR-2012-006655	CR-2013-001814	

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 2012 Annual Report on the Meteorological Monitoring Program
 2012 Land Use Census
 50.75(g) Decommission Files for Leaks and Spills
 Air Sampler Numbers 04D949944, 04E048706, 04E048710, 04E048712, and 04E048718
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 Environmental Cross Check Samples, 1st Quarter 2013, 3rd and 4th Quarters 2012
 Inter-Laboratory Comparison Program Results, 1st, 2nd, 3rd, and 4th Quarters 2012
 Meteorological Primary and Backup Instrumentation Calibrated March 13, 2013
 Monthly Meteorological Monitoring Report, May 2013
 ODCM, Revision 27

Section 40A1: Performance Indicator Verification

Miscellaneous

MSPI Derivation Report, MSPI Cooling Water System, Unavailability Index, June 2013
 MSPI Derivation Report, MSPI Cooling Water System, Unreliability Index, June 2013
 MSPI Derivation Report, MSPI Emergency AC Power System, Unavailability Index, June 2013
 MSPI Derivation Report, MSPI Emergency AC Power System, Unreliability Index, June 2013
 MSPI Derivation Report, MSPI Heat Removal System, Unavailability Index, June 2013
 MSPI Derivation Report, MSPI Heat Removal System, Unreliability Index, June 2013
 MSPI Derivation Report, MSPI HPIS, Unavailability Index, June 2013
 MSPI Derivation Report, MSPI HPIS, Unreliability Index, June 2013
 MSPI Derivation Report, MSPI RHR System, Unavailability Index, June 2013
 MSPI Derivation Report, MSPI RHR System, Unreliability Index, June 2013
 NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 6

Section 40A2: Problem Identification and Resolution

Procedures

EP-3-P-0132, Fire Protection Appendix R Conformance Verifications, Revision 00900
 FPS-16, Bulk Storage of Combustible Materials and Transient Fire Loads, Revision 01700

Condition Reports

CR-2013-001507	CR-2013-004568	CR-2013-005314
CR-2013-001714	CR-2013-004777	CR-2013-005350
CR-2013-001829	CR-2013-004949	CR-2013-005438
CR-2013-002485	CR-2013-004951	CR-2013-005692
CR-2013-002803	CR-2013-005244	CR-2013-005718
CR-2013-002895	CR-2013-005263	CR-2013-005726
CR-2013-003256	CR-2013-005264	

Miscellaneous

DA-ME-98-004, Combustible Loading Analysis, Revision 11
 EPM-FPPR, Ginna Station Fire Protection Program Report Volumes 1, 2, and 3, Revision 009.0

Section 40A3: Follow-Up of Events and Notices of Enforcement Discretion

Procedures

CENG-PR-1.01-1005, Control of Constellation Nuclear Generation Technical Procedure Format and Content, Revision 00500

O-6.9.4, Positive Reactive Capability Testing, Revision 00601

PRI-06-02-KVRELAY, Protective Relay Calibration 19 KV and 115 KV Relaying, Revision 00300

PRI-26-02-GEN, Protective Relay Trip Test 19 KV and 115 KV Relaying, Revision 01001

Drawings

21489-0371, Intermediate Building Elevation 253 feet 5 inches Floor Drain System Backflow Prevention, Revision 000

33013-1073, Charging Pump Room Basement Auxiliary Building Floor Drain Backwater Prevention, Revision 002

33013-1271, Waste Disposal-Liquid Liquid Waste Evaporator System and Waste Condensate Tanks P&ID, Revision 018

Condition Report

CR-2013-002437

CR-2013-004461

Miscellaneous

Sequence of Events Log, July 24, 2013

Section 40A7: Licensee-Identified Violations

Condition Report

CR-2013-002437

LIST OF ACRONYMS

10 CFR	Title 10 of the <i>Code of Federal Regulations</i>
AC	alternating current
ACE	apparent cause evaluation
ADAMS	Agencywide Documents Access and Management System
AFW	auxiliary feedwater
AOV	air-operated valve
CAP	corrective action program
CENG	Constellation Energy Nuclear Group, LLC
CR	condition report
ECP	engineering change package
EDG	emergency diesel generator
DC	direct current
FIN	finding
GPI	ground water protection initiative
gpm	gallons per minute
IMC	Inspection Manual Chapter
LER	licensee event report
MSPI	mitigating systems performance index
NEI	Nuclear Energy Institute
NCV	non-cited violation
NRC	Nuclear Regulatory Commission
ODCM	offsite dose calculation manual
OOS	out of service
QPA	quality performance and assessment
REMP	radiological environmental monitoring program
RFO	refueling outage
RHR	residual heat removal
SSC	structure, system, and component
TS	technical specification
UFSAR	Updated Final Safety Analysis Report
URI	unresolved item
WO	work order