



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 15, 2023

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

**SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 – BIENNIAL
PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT
05000277/2023010 AND 05000278/2023010 AND NOTICE OF VIOLATION**

Dear David Rhoades:

On August 3, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed a problem identification and resolution inspection at your Peach Bottom Atomic Power Station, Units 2 and 3, and discussed the results of this inspection with David Henry, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed the station's problem identification and resolution program and the station's implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for problem identification and resolution programs. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

The team also evaluated the station's processes for use of industry and NRC operating experience information and the effectiveness of the station's audits and self-assessments. Based on the samples reviewed, the team determined that your staff's performance in each of these areas adequately supported nuclear safety.

Finally, the team reviewed the station's programs to establish and maintain a safety-conscious work environment, and interviewed station personnel to evaluate the effectiveness of these programs. Based on the team's observations and the results of these interviews, the team found no evidence of challenges to your organization's safety-conscious work environment. Your employees appeared willing to raise nuclear safety concerns through at least one of the several means available.

The enclosed report discusses a violation associated with a finding of very low safety significance (Green). The NRC evaluated this violation in accordance Section 2.3.2 of the NRC Enforcement Policy, which can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. We determined that this violation did not meet the criteria to be treated as a non-cited violation because Peach Bottom Atomic Power Station did not restore compliance or demonstrate objective evidence of plans to restore compliance in a reasonable period of time following identification of the previous violation. Specifically, the inspectors considered it was reasonable, within the last two years, to troubleshoot the drainage systems located in the pipe trench or otherwise divert water run-off from the area. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC's review of your response will also determine whether further enforcement action is necessary to ensure your compliance with regulatory requirements.

If you contest the violation or the significance or severity of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for 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; and the NRC Resident Inspector at Peach Bottom Atomic Power Station, Units 2 and 3,.

If you disagree with a cross-cutting aspect assignment 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 U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; and the NRC Resident Inspector at Peach Bottom Atomic Power Station, Units 2 and 3.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Sarah H. Elkhiamy, Acting Chief
Projects Branch 4
Division of Operating Reactor Safety

Docket Nos. 05000277 and 05000278
License Nos. DPR-44 and DPR-56

Enclosures:

1. Inspection Report 05000277/2023010
and 05000278/2023010
2. Notice of Violation

cc w/ encl: Distribution via LISTSERV

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 – BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000277/2023010 AND 05000278/2023010 AND NOTICE OF VIOLATION DATED SEPTEMBER 15, 2023

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000277 and 05000278

License Numbers: DPR-44 and DPR-56

Report Numbers: 05000277/2023010 and 05000278/2023010

Enterprise Identifier: I-2023-010-0013

Licensee: Constellation Energy Generation, LLC

Facility: Peach Bottom Atomic Power Station, Units 2 and 3

Location: Delta, PA 17314

Inspection Dates: July 17, 2023 to August 3, 2023

Inspectors: T. Daun, Senior Resident Inspector
C. Dukehart, Resident Inspector
N. Floyd, Senior Reactor Inspector
A. Turilin, Reactor Inspector

Approved By: Sarah H. Elkhiamy, Acting Chief
Projects Branch 4
Division of Operating Reactor Safety

SUMMARY

The U.S. NRC continued monitoring the licensee's performance by conducting a biennial problem identification and resolution inspection at Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS) in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

Failure to Establish Corrective Action for Erosion of Structural Backfill Material in the Pipe Trench			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NOV 05000277,05000278/2023010-01 Open	[H.1] - Resources	71152B
The inspectors identified a Green finding and associated notice of violation (NOV) of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for PBAPS's failure to establish a corrective action for a condition adverse to quality associated with the erosion of structural backfill material in the pipe trench on the west side of the site.			

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures in effect at the beginning of the inspection unless otherwise noted. Currently approved inspection procedures with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – BASELINE

71152B - Problem Identification and Resolution

Biennial Team Inspection (IP Section 03.04) (1 Sample)

- (1) The inspectors performed a biennial assessment of the effectiveness of the licensee's Problem Identification and Resolution program, use of operating experience, self-assessments and audits, and safety-conscious work environment.
 - Problem Identification and Resolution Effectiveness: The inspectors assessed the effectiveness of the licensee's Problem Identification and Resolution program in identifying, prioritizing, evaluating, and correcting problems. The inspectors also conducted a five-year review of the service water and high-pressure service water systems.
 - Operating Experience: The inspectors assessed the effectiveness of the licensee's processes for use of operating experience.
 - Self-Assessments and Audits: The inspectors assessed the effectiveness of the licensee's identification and correction of problems identified through audits and self-assessments.
 - Safety-Conscious Work Environment: The inspectors assessed the effectiveness of the station's programs to establish and maintain a safety-conscious work environment.

INSPECTION RESULTS

Assessment	71152B
Corrective Action Program Effectiveness	
<p><u>Problem Identification:</u> The inspectors determined that, in general, PBAPS identified issues and entered them into the corrective action program accurately, timely, and at an appropriately low threshold.</p>	
<p><u>Problem Prioritization and Evaluation:</u> Based on the samples reviewed, the inspectors determined that PBAPS appropriately prioritized and evaluated issues commensurate with the safety significance of the identified problem. PBAPS appropriately screened condition reports for operability and reportability, categorized condition reports by significance, and assigned actions to the appropriate department for evaluation and resolution.</p>	
<p><u>Corrective Actions:</u> The inspectors determined the overall corrective action program performance related to resolving problems was effective. In most cases, PBAPS implemented corrective actions to resolve problems in a timely manner. However, the inspectors noted several examples where PBAPS did not document corrective actions for conditions adverse to quality as required by their procedures. A corresponding minor performance deficiency is documented in this report. Additionally, inspectors identified one instance where corrective actions had not been planned or completed for an NRC-identified non-cited violation (NCV). A corresponding NOV is documented in this report.</p>	
Assessment	71152B
Operating Experience, Self-Assessments and Audits	
<p><u>Use of Operating Experience:</u> The team determined that PBAPS appropriately evaluated industry operating experience for its relevance to the facility. PBAPS appropriately incorporated both internal and external operating experience into plant procedures and processes, as well as lessons learned for training and pre-job briefs.</p>	
<p><u>Self-Assessments and Audits:</u> The team reviewed a sample of self-assessments and audits performed by both Nuclear Oversight and individual departments to assess whether the licensee was identifying and addressing performance trends. The team concluded that PBAPS had an effective self-assessment and audit process.</p>	
Assessment	71152B
Safety-Conscious Work Environment	
<p>The team interviewed 24 individuals across various organizations including Operations, Engineering, Maintenance, Emergency Planning, Radiation Protection, and Security. The purpose of these interviews was to evaluate the willingness of the licensee staff to raise nuclear safety issues; to evaluate the perceived effectiveness of the corrective action program at resolving identified problems; and to evaluate the licensee's safety-conscious work environment. The team interviewed the Employee Concerns Program (ECP) representative to assess their perception of the site employees' willingness to raise nuclear safety concerns. The team also reviewed the ECP case log and select case files.</p>	

All individuals interviewed indicated that they would raise safety concerns. All individuals felt that their management was receptive to receiving safety concerns and generally addressed them promptly, commensurate with the significance of the concern. Most interviewees indicated they were adequately trained and proficient on initiating condition reports. All interviewees were aware of the licensee's ECP, stated they would use the program if necessary, and expressed confidence that their confidentiality would be maintained if they brought issues to the ECP. When asked whether there have been any instances where individuals experienced retaliation or other negative reaction for raising safety concerns, all individuals interviewed stated that they had neither experienced nor heard of an instance of retaliation at the site. The team determined that the processes in place to mitigate potential safety-conscious work environment issues were adequately implemented.

Failure to Establish Corrective Action for Erosion of Structural Backfill Material in the Pipe Trench			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NOV 05000277,05000278/2023010-01 Open	[H.1] - Resources	71152B
The inspectors identified a Green finding and associated NOV of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for PBAPS's failure to establish a corrective action for a condition adverse to quality associated with the erosion of structural backfill material in the pipe trench on the west side of the site.			
<p><u>Description:</u> In August 2021, the NRC documented a finding and associated NCV for PBAPS's failure to correct a condition adverse to quality associated with the erosion of structural backfill material in the pipe trench on the west side of the site. The NCV was documented in NRC inspection report 05000277/2021012 and 05000278/2021012 (ML21265A334). PBAPS staff entered the NCV into their corrective action program as AR 04448889 and credited the actions completed under AR 04443058 to address the human performance issues that resulted in the NCV, and the actions tracked under AR 04424065 to address the technical issues. During follow-up review, the inspectors found that actions were limited to troubleshooting the causes of erosion, but no actions to stop and correct the erosion of structural backfill material had been identified.</p> <p>PBAPS was constructed with a common pipe trench on the west side of the site that houses portions of piping for both Units 2 and 3, including the safety-related high-pressure service water and the emergency service water systems. These two systems were designed as seismic class I and were supported on structural backfill material prior to being buried in the trench. The structural backfill provides for drainage and support of the buried components such as piping and electrical ducts. The high-pressure service water system is designed to provide a reliable supply of cooling water for the residual heat removal system. The emergency service water system is designed to provide a reliable supply of cooling water to safety-related equipment. The pipe trench also contains a storm drainpipe to collect rain water run-off from the roadway and the reactor and turbine building roofs, and a porous trench drainpipe to provide overall drainage for the common pipe trench.</p> <p>The August 2021 finding and NCV documented that PBAPS failed to correct a condition adverse to quality associated with the erosion of the structural backfill material in the pipe</p>			

trench on the west side of site. Specifically, PBAPS had been aware of the erosion of the backfill as far back as 2009 but had not developed or planned corrective actions to address it. PBAPS entered the issue into their corrective action program under AR 04443058.

The inspectors reviewed PBAPS's completed and planned actions taken since the documentation of the previous NCV to resolve the erosion of structural backfill material in the pipe trench. The inspectors also performed walkdowns of the roadway above the pipe trench to assess the general condition of the roadway and improvements completed to address the inspection finding from August 2021. The inspectors observed that PBAPS had repaved the dewatering building truck bay entrance and installed plastic shims inside the degraded vertical sections of the storm drain basins. However, the inspectors observed a new sunken gravel area with an exposed pipe adjacent to the Unit 3 reactor building. PBAPS documented this sunken area as a sink hole in AR 04502620, dated May 29, 2022, and determined the cause was from a degraded roof drain that connected to the storm drain buried in the pipe trench.

The inspectors reviewed AR 04424065 for additional actions to address the soil erosion issue. PBAPS staff had generated the following actions and due dates:

- Determine benefit of repaving (Assignment 9 – action item (ACIT) – Extended to December 30, 2023)
- Develop preventive maintenance to inspect area to determine if repairs required to avoid intrusion of groundwater (Assignment 10 – ACIT – Extended to June 30, 2024)
- Evaluate max settlement of buried piping (Assignment 11 – ACIT – Extended to August 31, 2023)
- Increase the inspection frequency of the pipe supports (Assignment 13 – CA – Completed)
- Determine work scope to improve drainage (Assignment 14 – ACIT – Extended to December 30, 2023)
- Inspect buried porous concrete pipe used to drainpipe trench (Assignment 18 – SPC – Extended to September 30, 2023)
- Inspect storm drain system (Assignment 19 – ACIT – Completed)

PBAPS staff performed visual examinations inside the buried storm drain piping located in the pipe trench from August 2022 to November 2022. They found a significant amount of debris in the southern section of storm drain piping which required multiple cleaning evolutions to remove. They subsequently discovered a complete blockage inside the pipe from a flowable concrete fill material, likely from a previous repair, which has not yet been removed. The inspectors noted that these blockages would prevent proper storm drain flow and contribute to additional water accumulation and erosion in the pipe trench. PBAPS staff attempted to visually examine inside the buried porous concrete pipe which functions as the trench drain, but the inspection could not be performed due to poor visibility. The staff extended the assignment to September 2023 until the north yard sump pump could be reactivated to support pumping down the trench drainpipe. The inspectors noted that PBAPS staff have not completed the examinations necessary to finish troubleshooting of the overall soil erosion issue.

PBAPS staff planned to evaluate the maximum pipe settlement that the high-pressure service water and emergency service water systems could accommodate. The assignment due date was extended to August 31, 2023 to obtain vendor assistance with the piping stress analysis and associated modeling. Based on discussions with PBAPS staff, the inspectors understood

that a draft evaluation of one train of the high-pressure service water system would be completed by the due date.

In condition report AR 04424065, the inspectors noted that PBAPS staff generated one corrective action under assignment 13 to increase the inspection frequency looking for gaps on the impacted pipe supports in the reactor buildings from annually to every six months. This pipe settlement data would provide an indirect method of monitoring the ongoing erosion. The inspectors reviewed the pipe support inspection data from October 2021 to July 2023 and noted multiple instances of identified gaps mostly located at Unit 2, which indicated that erosion and settlement are ongoing.

PI-AA-125, "CAP Procedure," Revision 8, step 4.5.2 states, in part, to create a corrective action for any planned action necessary to restore a condition adverse to quality. The inspectors determined that PBAPS had not created a corrective action to address the ongoing erosion of the structural backfill in the pipe trench. PBAPS staff had generated several assignments characterized as ACITs which, per PI-AA-125 are to be used to improve performance or correct minor problems that do not represent conditions adverse to quality. PBAPS staff also established a "special plant condition" assignment type for the porous trench drain examination, but this action was not completed. PBAPS identified several deficiencies involving the storm drain system that were likely contributing to the adverse condition, but they had not finished troubleshooting and had not taken actions to prevent further erosion, for instance by diverting water run-off from the area.

The inspectors considered it was reasonable to expect PBAPS to have made further progress within the last two years toward troubleshooting the cause of the erosion, evaluating the impact of pipe settlement, and establishing a plan for resolution. The inspectors determined that PBAPS did not restore compliance or demonstrate objective evidence of plans to restore compliance in a reasonable period of time following identification of the previous violation because PBAPS had no actions identified, planned, or performed that would address the erosion of structural backfill material in the pipe trench on the west side of the site.

Corrective Actions: PBAPS staff entered the issue into their corrective action program under AR 04696817. PBAPS staff also discussed their ongoing plans to address the issue with the inspectors.

Corrective Action References: ARs 04424065, 04443058, 04448889, and 04696817

Performance Assessment:

Performance Deficiency: The inspectors determined PBAPS's failure to establish corrective actions to restore a condition adverse to quality as required by procedure PI-AA-125 was a performance deficiency. Specifically, while PBAPS planned actions to troubleshoot the causes of the erosion of structural backfill in the pipe trench, these actions had not been completed, and there was no objective evidence of plans to stop and correct the erosion of the structural backfill material.

Screening: The inspectors determined the performance deficiency was more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, continued erosion of backfill material and settlement of the buried piping can lead to increased pipe loading beyond what it is analyzed for and increased degradation of pipe exterior corrosion protective coatings due to the wet environment.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process for Findings At-Power." The inspectors determined the finding was of very low safety significance (Green) because the impacted piping and connected components have been currently demonstrated to maintain their operability and/or probable risk assessment functionality. Inspectors observed that PBAPS continues to monitor the settlement of safety-related piping and have been able to evaluate that the structural integrity of the piping remains within acceptable stress limits during the current monitoring cycle.

Cross-Cutting Aspect: H.1 - Resources: Leaders ensure that personnel, equipment, procedures, and other resources are available and adequate to support nuclear safety. Specifically, appropriate resources were not devoted to the investigation under the special plant condition to promptly identify and develop timely corrective actions for the issue. PBAPS extended the special plant condition on multiple occasions because of foreseeable restraints on available resources such as developing temporary change configurations and procuring necessary equipment to support planned investigations.

Enforcement:

Violation: 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as deficiencies, defective material, and non-conformances are promptly identified and corrected.

PI-AA-125, "CAP Procedure," Revision 7, step 4.5.2 states, in part, to create a corrective action for any planned actions necessary to restore a condition adverse to quality.

Contrary to the above, from at least May 10, 2021 to present, PBAPS did not establish measures to correct the condition adverse to quality associated with the erosion of structural backfill material in the pipe trench.

Enforcement Action: This violation is being cited because the licensee failed to restore compliance within a reasonable period of time after the violation was identified, consistent with Section 2.3.2 of the Enforcement Policy.

Minor Performance Deficiency	71152B
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Failure to Document and Accurately Label Corrective Actions for Multiple Conditions Adverse to Quality Contrary to Procedural Requirements

Minor Performance Deficiency: During a review of PBAPS's evaluations of various plant issues, the inspectors observed a negative trend where corrective actions were not assigned and/or documented in the condition report and associated workgroup evaluations. This is contrary to the requirements in Constellation procedure PI-AA-125 "CAP Procedure." Step 4.3.5 provides the requirements for performing a workgroup evaluations and states to clearly identify the corrective action credited for restoring the condition adverse to quality, and if not completed, ensure a corrective action-type action clearly provides details on closing a corrective action-type action using the model corrective action template. Step 4.5.2 states to create a corrective action for any planned action necessary to restore a condition adverse to quality.

The following condition reports are examples of this trend:

- AR 04495954, workgroup evaluations for NRC graded exercise objective E.3 DEP failure
- AR 04564416, workgroup evaluations for use of non-calibrated measuring and test equipment
- AR 04533688, workgroup evaluations for NCV in response to not adequately performing IST on check valves

Screening: The inspectors determined the performance deficiency was minor. While this trend represents a performance deficiency for PBAPS not following procedure PI-AA-125, the inspectors determined the issue is minor because the issue was administrative in nature and did not result in any uncorrected conditions adverse to quality.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process for Findings At-Power."

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On August 3, 2023, the inspectors presented the biennial problem identification and resolution inspection results to David Henry, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date	
71152B	Calculations	EQ-PB-019A	Environmental Qualification/Automatic Valve Corp. (AVCO) Pilot Solenoid Valve for Srv Actuators		
	Corrective Action Documents	01450181-3			
		01991702			
		02365711			
		02465711			
		02472724			
		02634705			
		03946213			
		04094227			
		04162789			
		04165867			
		04186043			
		04196417			
		04219738			
		04227281			
		04289582			
		04304443			
		04314314			
		04333925			
		04339313			
		04342483			
		04388560-59			
		04389412			
		04398032			
		04399671		SBM Switch Failures Review for Part 21	
		04400698			
		04401994			
		04403989			
		04408545			
		04408549			

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		04411414		
		04424065		
		04424264		
		04436966		
		04438840		
		04441079		
		04442380		
		04443036		
		04443058	CAPE - PI&R NRC ID- Long-Term Concerns for Soil Erosion and Effects	
		04443996		
		04445286		
		04447104		
		04448889	Failure to Correct Erosion in Pipe Trench	
		04449648		
		04454298		
		04454914		
		04459665		
		04460251		
		04460430	Part 21 (Potential) Curtiss Wright/NOVA Machined Threaded Rod Used to Install 2AE001 Feedwater Heater Head/Manway in P2R23 Post EC	
		04460767	Unit 2 Manual Scram Due to Degrading Main Condenser Vacuum (Root Cause)	
		04463899		
		04464578		
		04467265		
		04469658		
		04474683	OPEX Review of IRIS 493328 Unplanned Inoperability of ECCS Pumps Caused by Improper Engagement of the Male and Female Stabs on Fuse Blocks Installed in Breaker Compartments	
		04475870		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		04476417	WGE - 3AP145 Coupling and Bearing Showing Heavy Degradation	
		04479986		
		04481917		
		04482016	WGE - NRC ID: 480V Breaker Hoist Seismic Restraint not Engaged	
		04482699		
		04485805		
		04487126		
		04487128		
		04489142		
		04490075		
		04495946		
		04495954	WGE - PB NRC Graded Exercise Failed Obj E.3 DEP Failure	
		04496102		
		04497937		
		04500178	RCR - U2 Scram Following Grid Disturbance	
		04500347		
		04501017		
		04501210		
		04501211		
		04501530		
		04501538		
		04501812		
		04502015		
		04507306		
		04511151		
		04511152		
		04511262		
		04514157	480V Breaker Hoist Seismic Restraint Disengaged Due to Design Vulnerability (NCV 2022002-01)	
		04514164		
		04515278	Lowering Condenser Vacuum / C Condenser Performance	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			(CAPE)	
		04515394		
		04516351		
		04516895		
		04518180		
		04518191		
		04519848		
		04522170		
		04529976		
		04530683		
		04531804		
		04533058		
		04533261	Unit 2 HPCI Steam Leak at LE-2-23-090 Flange Connection (WGE)	
		04533554	Leaks on EHC Supply/Drain Piping Identified During P2R24 (CAPE)	
		04533663	Unit 2 Manual Scram for Degrading Condenser Vacuum (Green Finding, WGE)	
		04533688	HSPW Discharge Check Valve Manually Closed During IST (NCV, WGE)	
		04534311		
		04535201		
		04536815		
		04537050		
		04538450		
		04540155	Loss of Reactor Protection System Power and Unit Scram Due to Operator Error	
		04542021		
		04545648		
		04547694		
		04547717		
		04550779	Unit 2 EOC Install Grounding Ring on 2D Backup Air Compressor	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		04553266		
		04553779		
		04554494		
		04560404	Unit 2 Service Water 2AP004-DR CT Wiring Inspections	
		04560996		
		04563423	2A RHR Minimum Flow Valve Failure due to Agastat Relay Failure (NCV)	
		04564181		
		04564416	M&TE Used Past the Calibration Date (WGE)	
		04666606		
		04673616		
		04679126		
		04682247	Hardened Containment Vent System Battery Test Not Performed	
		04683544		
		04685389		
	Corrective Action Documents Resulting from Inspection	04694224		
		04694366		
		04694390		
		04694433		
	Engineering Changes	EC 635851	E3 EDG Low Voltage Cables Replacement	Revision 002
		ECR 06-00277	Unit 2 Yard Drain Sump and Oil Filtration Skid	Revision 2
	Procedures	CC-AA-101	Engineering Change Requests (ER)	Revision 7
		CC-AA-112	Temporary Configuration Changes	Revision 32
		CC-AA-309-101	Engineering Technical Evaluations	Revision 16
		CC-AA-309-1012	10 CFR Part 21 Technical Evaluations	Revision 6
		EP-AA-1000	Standardized Radiological Emergency Plan	Revision 33
		EP-AA-1007	Radiological Emergency Plan Annex for Peach Bottom Atomic Power Station	Revision 35
		OP-AA-108-115	Operability Determinations (CM-1)	Revision 26
		PI-AA-115	Operating Experience Program	Revision 5
		PI-AA-115-1001	Processing of Level 1 and 2 OPEX Evaluations	Revision 4
		PI-AA-115-1003	Processing of Level 3 OPEX Evaluations	Revision 7

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
		PI-AA-116	Nuclear Safety Review Board	Revision 4
		PI-AA-120	Issue Identification and Screening Process	Revision 13
		PI-AA-125	Corrective Action Program (CAP) Procedure	Revision 8
		PI-AA-125-1001	Root Cause Analysis Manual	Revision 7
		PI-AA-125-1003	Corrective Action Program Evaluation Manual	Revision 7
		PI-AA-125-1004	Effectiveness Review Manual	Revision 2
		PI-AA-126-1001	Self-Assessments	Revision 5
		WC-AA-106	Work Screening and Processing	Revision 20
	Self-Assessments	04435736	Peach Bottom Corrective Action Program Audit (NOSA-PEA-21-05)	
		04439785	Biennial Safety Culture Self-Assessment	
		04470209	Peach Bottom Maintenance Audit (NOSA-PEA-22-01)	
		04475218	Temporary Configuration Change 2022 (NOSA-PEA-22-10)	
		04475218	Emergency Preparedness 2022 (NOSA-PEA-22-02)	
		04486815	Preparation for NRC Problem Identification and Resolution (PI&R) Inspection	
		04507993	Peach Bottom Operations Audit (NOSA-PEA-22-04)	
		04526768	Peach Bottom Cyber Security Audit (NOSA-PEA-22-06)	
		04546411	Peach Bottom Security Programs Audit (NOSA-PEA-23-01)	
	Work Orders	01264153		
		05293306		

NOTICE OF VIOLATION

Constellation Energy Generation, LLC

Docket Nos.: 05000277 and
05000278

Peach Bottom Atomic Power Station, Units 2 and 3

License Nos.: DPR-44 and DPR-56

Consistent with the Nuclear Regulatory Commission Enforcement Policy and Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2.201, the following violation identified in inspection report 2023010 is being cited:

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality, such as deficiencies, defective material, and non-conformances are promptly identified and corrected.

PI-AA-125, "Corrective Action Program Procedure," Revision 7, step 4.5.2 states, in part, to create a corrective action for any planned actions necessary to restore a condition adverse to quality.

Contrary to the above, from at least May 10, 2021 to present, Peach Bottom staff did not establish measures to correct the condition adverse to quality associated with the erosion of structural backfill material in the pipe trench.

This violation is associated with a Green Significance Determination Process finding.

Pursuant to the provisions of 10 CFR 2.201, Constellation Nuclear is required to submit a written explanation or statement to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region 1, and a copy to the NRC Resident Inspector at Peach Bottom, within 30 days of the date of the issuance of this Notice of Violation. Please mark your reply "Reply to a Notice of Violation" and include the following for each violation:

- (1) The reason for the violation, or, if contested, the basis for disputing the violation
- (2) The corrective steps that have been taken and the results achieved
- (3) The corrective steps that will be taken
- (4) The date when full compliance will be achieved

Your written explanation or statement may reference or include previous docketed correspondence, if the correspondence adequately addressed the required response. If an adequate reply is not received within 30 days, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why other appropriate action should not be taken. Where good cause is shown, consideration will be given to extending the required 30 day response time.

If you contest this enforcement action, please provide an additional copy of your response, with your basis for denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this September 15, 2023