



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

July 20, 2020

Mr. Trevor L. Orth
Site Decommissioning Director
Three Mile Island Nuclear Station, Unit 1
2625 River Road
Middletown, PA 17057

SUBJECT: NRC INSPECTION REPORT NO. 05000289/2020003, EXELON GENERATION CO., LLC, THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Dear Mr. Orth:

On June 30, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed its quarterly inspection under Inspection Manual Chapter 2561, "Decommissioning Power Reactor Inspection Program," at the permanently shutdown Three Mile Island Nuclear Station, Unit 1 (TMI Unit 1). An on-site inspection was performed June 29, 2020. Additional inspection activities (in office reviews) were conducted remotely as a consequence of the COVID-19 public health emergency (PHE) during the inspection period. The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of plant walkdowns by the inspector, interviews with site personnel, and a review of procedures and records. The results of the inspection were discussed with Mr. John Piazza, Senior Decommissioning Project Manager, and other members of the TMI Unit 1 staff on July 1, 2020 and are described in the enclosed report. No findings of safety significance were identified.

In accordance with Title 10 Code of Federal Regulations (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if any, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response, if any, should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Radioactive Waste; Decommissioning of Nuclear Facilities**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's Website at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy** (Under 'Related Information'). You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

T. Orth

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No reply to this letter is required. Please contact Steve Hammann at 610-337-5399 if you have any questions regarding this matter.

Sincerely,

/RA/

Anthony Dimitriadis, Chief
Decommissioning, ISFSI, and Reactor Health
Physics Branch
Division of Nuclear Materials Safety

Docket No. 05000289

License No. DPR-50

Enclosure: Inspection Report 05000289/2020003

cc w/encl: Distribution via ListServ

NRC INSPECTION REPORT NO. 05000289/2020003, EXELON GENERATION CO., LLC,
 THREE MILE ISLAND NUCLEAR STATION, UNIT 1, MIDDLETOWN, PENNSYLVANIA
 DATED JULY 20, 2020

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

INSPECTION REPORT

Inspection No. 05000289/2020003
Docket No. 05000289
License No. DPR-50
Licensee: Exelon Generation Co., LLC (Exelon)
Facility: Three Mile Island Nuclear Station, Unit 1 (TMI Unit 1)
Location: Middletown, PA 17057
Inspection Dates: April 1, 2020 – June 30, 2020
Inspector: Stephen Hammann, Senior Health Physicist
Decommissioning, ISFSI, and Reactor Health Physics Branch
Division of Nuclear Materials Safety, Region I
Approved By: Anthony Dimitriadis, Chief
Decommissioning, ISFSI, and Reactor Health Physics Branch
Division of Nuclear Materials Safety, Region I

EXECUTIVE SUMMARY

Exelon Generation Co., LLC
Three Mile Island Nuclear Station, Unit 1
NRC Inspection Report No. 05000289/2020003

An announced quarterly decommissioning inspection was completed at TMI Unit 1 on June 30, 2020. An on-site inspection was performed June 29, 2020. Additional inspection activities were conducted remotely during the inspection period as a consequence of the COVID-19 public health emergency (PHE). The inspection included a review of audits and corrective actions, and solid radwaste management and transportation. The inspection consisted of plant walkdowns by the inspector, interviews with site personnel, and a review of procedures and records. The NRC's program for overseeing the safe operation of a shutdown nuclear power reactor is described in Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program."

Based on the results of this inspection, no violations of safety significance were identified.

REPORT DETAILS

1.0 Background

On September 26, 2019, Exelon sent a letter [Agency Documentation and Management System (ADAMS) Accession Number ML19269E480] to the NRC certifying the permanent cessation of activities and permanent removal of fuel from the reactor. This met the requirements of 10 Code of Federal Regulations (CFR) 50.82(a)(1)(i) and 50.82(a)(1)(ii). On October 1, 2019, the NRC notified Exelon that the Operating Reactor Assessment Program would terminate and that implementation of the Decommissioning Power Reactor Inspection Program would begin (ADAMS Accession No. ML19274B163). TMI Unit 1 is currently in the Post-Operation Transition phase of decommissioning with fuel in the spent fuel pool as described in IMC 2561.

2.0 Post-Operation Transition Performance and Status Review

a. Inspection Scope [Inspection Procedures (IPs) 40801, 86750]

The inspector reviewed documents and interviewed TMI Unit 1 personnel to determine if Exelon management performed audits and ensured issues were identified and corrected in accordance with the site's corrective action program (CAP). The inspector reviewed a representative selection of CAP documents to determine if a sufficiently low threshold for problem identification existed, follow-up evaluations were of sufficient quality, and Exelon assigned timely and appropriate prioritization for issue resolution commensurate with the significance of the issue. The inspector reviewed two of the site audits for the past year to determine if audits were thorough and if corrective actions were initiated if necessary.

The inspector observed activities and reviewed documentation associated with solid radioactive waste management to determine the effectiveness of site's radiological program. The inspector performed a walk-down of radwaste buildings and radioactive waste storage locations to ensure TMI Unit 1 had properly classified and stored radioactive materials. The inspector also reviewed work packages for shipments of radioactive waste. The review included records of shipment packaging, surveying, labeling, marking, placarding, vehicle checks, and emergency instructions to ensure compliance with the applicable NRC and Department of Transportation regulations. The inspector reviewed the training program and records to verify radwaste personnel were qualified to implement the site solid radwaste program.

b. Observations and Findings

The inspector determined that issues were being identified and entered into the CAP in a timely manner and the issues were effectively screened, prioritized and evaluated commensurate with their safety significance. The inspector verified audits were being performed by qualified individuals independent of the organization being audited and that management reviewed the audits and associated corrective actions. The inspector verified the Exelon Nuclear Oversight organization continues to perform oversight of decommissioning activities.

The inspector verified solid radioactive waste was adequately stored and monitored and worker radwaste training and qualifications were up-to-date. The inspector verified that radioactive waste shipping paperwork was properly completed and Exelon personnel were knowledgeable of their duties and responsibilities. The inspector determined radioactive waste shipped for disposal at land disposal facilities was properly classified, described, packaged, marked, and labeled, and was in proper condition for transportation.

c. Conclusions

Based on the results of this inspection, no violations of safety significance were identified.

3.0 Exit Meeting Summary

On July 1, 2020, the inspector presented the inspection results to Mr. John Piazza, Senior Decommissioning Project Manager, and other members of Exelon staff. The inspector verified that no proprietary information was retained or documented in this report.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Piazza, Senior Decommissioning Project Manager
B. Brady, Licensing and Regulatory Affairs
E. Carreras, EP Manager
S. Fink, Project Manager Lead
R. Holmes, Radiation Protection Manager
D. Moore, Technical Specialist
J. Stubbs, Decommissioning Specialist-Ops
D. Viola, Decommissioning Specialist-RP
A. Zeiss, CAP Manager

ITEMS OPEN, CLOSED, AND DISCUSSED

None

LIST OF DOCUMENTS REVIEWED

Assignment Reports

AR- 2020 – 4279199, 04286640, 04293254, 04306471, 04306640, 04316652, 04320068,
04323977, 04328923, 04341691

Procedures and Programs

NO-DC-10, Rev. 1, Decommissioning Quality Assurance Program (DQAP)
PI-DC-120, Rev. 1, Decommissioning Issue Identification and Screening Process
PI-DC-125, Rev. 1, Decommissioning Corrective Action Program (D-CAP) Procedure
RP-AA-600, Rev. 17, Radioactive Material/Waste Shipments
TQ-AA-166, Rev. 3, Radioactive Material Shipping Training

Miscellaneous

Qualification Matrices Radwaste Workers
Radwaste Shipment Number RS-19-081-I, RS-19-109-I, RS-20-002-I
Spent Fuel Cooling/Pool Health
NOSA-TMI-19-08, Operations Functional Area Audit Report
NOSA-TMI-20-03, Emergency Preparedness Audit Report

LIST OF ACRONYMS USED

ADAMS	Agencywide Document and Access Management System
CAP	Corrective Action Program
CFR	Code of Federal Regulations
Exelon	Exelon Generation Co., LLC
IMC	Inspection Manual Chapter
IP	Inspection Procedure
NRC	U.S. Nuclear Regulatory Commission
PHE	Public Health Emergency
TMI Unit 1	Three Mile Island Unit 1