

UNITED STATES NUCLEAR REGULATORY COMMISSION

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

August 4, 2022

Brad Berryman Senior Vice President and Chief Nuclear Officer Susquehanna Nuclear, LLC 769 Salem Blvd., NUCSB3 Berwick, PA 18603

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 -

INTEGRATED INSPECTION REPORT 05000387/2022002 AND

05000388/2022002

Dear Brad Berryman:

On June 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Susquehanna Steam Electric Station, Units 1 and 2. On July 28, 2022, the NRC inspectors discussed the results of this inspection with Kevin Cimorelli, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No NRC-identified or self-revealing findings were identified during this inspection.

A licensee-identified violation which was determined to be Severity Level IV is documented in this report. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

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 Susquehanna Steam Electric Station, Units 1 and 2.

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* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Jonathan E. Greives, Chief Projects Branch 4 Division of Operating Reactor Safety

Docket Nos. 05000387 and 05000388 License Nos. NPF-14 and NPF-22

Enclosure: As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 -

INTEGRATED INSPECTION REPORT 05000387/2022002 AND

05000388/2022002 DATED AUGUST 4, 2022

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ADAMS ACCESSION NUMBER: ML22213A260

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U.S. NUCLEAR REGULATORY COMMISSION Inspection Report

Docket Numbers: 05000387 and 05000388

License Numbers: NPF-14 and NPF-22

Report Numbers: 05000387/2022002 and 05000388/2022002

Enterprise Identifier: I-2022-002-0040

Licensee: Susquehanna Nuclear, LLC

Facility: Susquehanna Steam Electric Station, Units 1 and 2

Location: 769 Salem Blvd., Berwick, PA

Inspection Dates: April 1, 2022, to June 30, 2022

Inspectors: C. Highley, Senior Resident Inspector

M. Rossi, Resident Inspector

H. Anagnostopoulos, Senior Health Physicist L. Colon Fuentes, Construction Engineer E. Eve, Senior Resident Inspector

C. Hobbs, Reactor Inspector

Approved By: Jonathan E. Greives, Chief

Projects Branch 4

Division of Operating Reactor Safety

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Susquehanna Steam Electric Station, Units 1 and 2, 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. A licensee-identified non-cited violation is documented in report section: 71153.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

Туре	Issue Number	Title	Report Section	Status
LER	05000387,05000388/	LER 2021-002-00 for	71153	Closed
	2021-002-00	Susquehanna, Units 1 and 2,		
		Inoperability of Computer		
		Room Floor Cooling Fan		
		Caused by Extended		
		Operation with Worn Belts		
		Due to Less Than Adequate		
		Preventive Maintenance		
		Replacement Interval		

PLANT STATUS

Unit 1 began the inspection period shut down for a refueling outage. On April 29, 2022, the unit was started up and achieved rated thermal power on May 6, 2022. On May 7, 2022, the unit was down powered to 58 percent for a rod pattern adjustment. The unit was returned to rated thermal power on May 10, 2022. On May 13, 2022, the unit was down powered to 28 percent for work on one of the recirculation pump motor generator sets. The unit was returned to rated thermal power on May 19, 2022. On May 23, 2022, the unit scrammed due to the closure of the delta inboard main steam line isolation valve. The unit was returned to rated thermal power on June 5, 2022, and remained at or near rated thermal power for the remainder of the inspection period.

Unit 2 began the inspection period at or near rated thermal power. On June 17, 2022, the unit down powered to 67 percent for a rod sequence exchange. The unit was returned to rated thermal power on June 19, 2022, and remained at or near rated thermal power for the remainder of the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-mm/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 performed activities described in IMC 2515, Appendix D, "Plant Status," conducted routine reviews using IP 71152, "Problem Identification and Resolution," observed risk significant activities, and completed on-site portions of IPs. 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.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of summer high heat and seasonal thunderstorms for the following systems:
 - Off-site 500kV, T10, and T20 switchyards on May 18, 2022
 - Review of the stations' certification letter for 2022 summer readiness and walkdown of the circulation and service water pump house and towers on June 14, 2022

Impending Severe Weather (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the adequacy of the overall preparations to protect risk significant systems from impending severe weather, specifically, a tornado warning for Luzerne County on May 5, 2022.

71111.04 - Equipment Alignment

Partial Walkdown (IP Section 03.01) (4 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Unit Common, emergency service water and residual heat removal pump house prior to high-pressure coolant injection out of service on April 12, 2022
- (2) Unit Common, spent fuel pool cooling systems prior to common shutdown cooling out of service on April 14, 2022
- (3) Unit Common, off-site power switch yards walkdown on May 18, 2022
- (4) Unit 2, scram discharge header on May 20, 2022

Complete Walkdown (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated system configurations during a complete walkdown of the Unit 1 division 1 residual heat removal system on June 23, 2022.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Unit 1, reactor water cleanup areas (FZ 1-5D) on April 5, 2022
- (2) Unit Common, spent fuel pool heat exchanger cooling and pump rooms prior to common shutdown cooling work window (FZ 1-5A-N and 2-5A-S) on April 13, 2022
- (3) Unit 1, main steam pipeway (FZ 1-4G) on April 25, 2022
- (4) Unit 1, drywell close out tour (FZ 1-4F) on April 28, 2022
- (5) Unit 1, equipment access area (FZ 1-3C) on June 23, 2022

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (2 Samples)

The inspectors evaluated internal flooding mitigation protections in the:

- (1) Unit Common, fuel oil storage tank vault inspections for fuel transfer vault, 'A' emergency diesel generator vault, and 'C' emergency diesel generator vault on June 21, 2022
- (2) Unit 1, sump pump room internal flooding watertight door material condition on June 24, 2022

71111.07A - Heat Exchanger/Sink Performance

Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

(1) Unit 1, 'B' residual heat removal service water heat exchanger on April 14, 2022

71111.08G - Inservice Inspection Activities (BWR)

BWR Inservice Inspection Activities - Nondestructive Examination and Welding Activities (IP Section 03.01) (1 Sample)

(1) The inspectors verified that the Unit 1 reactor coolant system boundary, reactor vessel internals, risk significant piping system boundaries, and containment boundary were appropriately monitored for degradation and that repairs and replacements were appropriately fabricated, examined, and accepted by reviewing the following activities from April 4 to 8, 2022:

03.01.a - Nondestructive Examination and Welding Activities

- Manual ultrasonic examination of residual heat removal weld, DCA1102-FW-5 (WO 2379386)
- Manual ultrasonic examination of reactor pressure vessel bottom head drain expander, DBA-121-1-9625-X (WO 2432376)
- Penetrant testing of control rod drive (CRD) housing welds CRD-02-19, CRD-10-11, CRD-30-03, and RD-50-11 (WO 2381842)
- Reactor pressure vessel internal visual inspections of dryer skirt weld 7H, N5A header and bolting, and jet pump 10 (WO 2383398)
- Welding associated with B essential service water piping replacement (WO 2389913)

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

<u>Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01)</u> (1 Sample)

(1) The inspectors observed and evaluated licensed operator performance in the control room during Unit 1 reactor startup on April 29, 2022.

Licensed Operator Regualification Training/Examinations (IP Section 03.02) (1 Sample)

(1) The inspectors observed and evaluated operators in the performance of failed instrument, lockout of engineered safeguards system electrical bus, steam leak in a steam tunnel with a manual scram and closure of the main steam isolation valves, steam leak in the dry well, containment spray with a stuck open vacuum breaker, and emergency depressurizations of the plant on June 9, 2022.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (1 Sample)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components remain capable of performing their intended function:

(1) Unit 1, 'B' residual heat removal service water heat exchanger motor operated supply isolation valve (HV11210B) motor end bell replacement on April 9, 2022

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management (IP Section 03.01) (4 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Unit 2, yellow risk during the Unit 1 emergency service water buried piping replacement on April 1, 2022
- (2) Unit 1, yellow shutdown risk during the common decay heat removal work window on April 14, 2022
- (3) Unit 1, elevated risk during the infrequently performed evolution cavity letdown on April 24, 2022
- (4) Unit Common, 0X104 T-20 off-site power transformer out of service for relay modification on June 16, 2022

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (8 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Unit 1, division II core spray suction pressure relief valve leaking after cavity flood up documented in CR-2022-05026 on April 1, 2022
- (2) Unit Common, 'B' control structure chiller tripped due to a bearing sensor failure documented in CR-2022-04026 on April 1, 2022
- (3) Unit 1, reactor core isolation cooling vacuum breaker check valve cycling documented in CR 2022-04142 on May 20, 2022
- (4) Unit Common, 'A' emergency diesel generator low lube oil trip 20 seconds into monthly operability run documented in CR-2022-08830 on May 22, 2022
- (5) Unit 1, multiple emergency core cooling system snubbers did not meet VT3 acceptance documented in CR-2022-04891, CR-2022-06729, CR-2022-06827, CR-2022-06007, CR-2022-06430, CR-2022-06245, CR-2022-06900, CR-2022-05914, and CR-2022-06675 on May 25, 2022
- (6) Unit 1, reactor building closed loop cooling to emergency service water isolation capability documented in CR-2022-09860 on June 14, 2022
- (7) Unit 1, difficulty opening/closing states links during SO-104-B02 documented in CR-2022-09736 on June 29, 2022

(8) Unit Common, 'A' emergency service water discharge check valve failed to close after pump shutdown documented in CR-2022-00994 and CR-2022-03954 on June 30, 2022

71111.18 - Plant Modifications

<u>Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02)</u> (1 Sample)

The inspectors evaluated the following temporary or permanent modifications:

(1) Unit 1, installation of new core spray secondary containment bypass leakage test stations (permanent modification), DCP 2385912, on June 30, 2022

71111.19 - Post-Maintenance Testing

Post-Maintenance Test (IP Section 03.01) (10 Samples)

The inspectors evaluated the following post-maintenance testing activities to verify system operability and/or functionality:

- (1) Unit 1, 1X240 emergency safeguards system transformer replacement on April 7, 2022
- (2) Unit 1, emergency service water buried piping replacement on April 8, 2022
- (3) Unit 1, residual heat removal system breach work restoration on April 9, 2022
- (4) Unit 1, 'D' main steam isolation valve disc and internal component repair, PCWO 2541280-0, on April 14, 2022
- (5) Unit 1, 'B' main steam isolation valve seat repair and actuator replacement, RACT 1810602, on April 14, 2022
- (6) Unit 1, service water piping replacement in the fuel pool cooling heat exchanger room, PCWO 2420917-0, on April 19, 2022
- (7) Unit 1, main steam safety relief valve replacement and testing, RTSV 2547024, on April 26, 2022
- (8) Unit 1, high-pressure coolant injection steam supply valve HV155F003 inspection and repair, PCWO 2167319, on April 30, 2022
- (9) Unit 1, high-pressure coolant injection overhaul turbine and pump areas of work under work orders ERPM 2337378, ERPM 2203372, and RACT 2467063 on June 30, 2022
- (10) Unit Common, 'A' emergency diesel generator system outage window for work orders EPRM 2405072 and EPRM 2518118 with procedure SO-024-001A on June 30, 2022

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage (IP Section 03.01) (1 Sample)

(1) Unit 1, the inspectors evaluated the refueling outage activities April 1 to May 1, 2022.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance testing activities to verify system operability and/or functionality:

Surveillance Tests (other) (IP Section 03.01) (4 Samples)

- (1) Unit 1, SI-180-203, reactor pressure vessel level functional test for channels A through D, RTSV 2514807, on May 13, 2022
- (2) Unit 2, reactor coolant system activity sample on June 24, 2022
- (3) Unit 1, 24-month engineering safeguards system auxiliary bus 1B 93 percent degraded grid voltage timer reselect test, RTSV 2347807, on June 29, 2022
- (4) Unit 1, loss of coolant accident and loss of off-site power test 3/30 on June 30, 2022

Inservice Testing (IP Section 03.01) (1 Sample)

(1) Unit 1, high-pressure coolant injection and reactor coolant isolation cooling 950 psig test, SO-152-002 and SO-150-002, on May 5, 2022

Reactor Coolant System Leakage Detection Testing (IP Section 03.01) (1 Sample)

(1) Unit 2, reactor coolant leakage detection test surveillance on June 20, 2022

Containment Isolation Valve Testing (IP Section 03.01) (1 Sample)

(1) Unit 1, main steam isolation valve as-found local leak rate testing, RTSV 2379320, RTSV 2373783, RTSV 2333239, and RTSV 2373784 on June 30, 2022

FLEX Testing (IP Section 03.02) (1 Sample)

(1) Units 1 and 2, quarterly FLEX emergency generator testing, RTPM 2395741, on May 16, 2022

71114.06 - Drill Evaluation

<u>Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)</u>

The inspectors evaluated:

(1) Emergency planning full exercise drill of a resin spill with a release to public and an anticipated transient without a scram with reactor core isolation cooling unisolable steam leak with fuel damage on June 28, 2022

RADIATION SAFETY

71124.01 - Radiological Hazard Assessment and Exposure Controls

Radiological Hazard Assessment (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated how the licensee identifies the magnitude and extent of radiation levels and the concentrations and quantities of radioactive materials and how the licensee assesses radiological hazards.

Instructions to Workers (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated how the licensee instructs workers on plant-related radiological hazards and the radiation protection requirements intended to protect workers from those hazards.

Contamination and Radioactive Material Control (IP Section 03.03) (2 Samples)

The inspectors observed/evaluated the following licensee processes for monitoring and controlling contamination and radioactive material:

- (1) Equipment condition and conduct of personnel and equipment monitoring at the Unit 1 radiological controlled area access point
- (2) Use of radiological monitoring equipment at the control building radiological controlled area access point

Radiological Hazards Control and Work Coverage (IP Section 03.04) (4 Samples)

The inspectors evaluated the licensee's control of radiological hazards for the following radiological work:

- (1) RWP 2022-1345
- (2) RWP 2022-1001
- (3) RWP 2022-1002
- (4) RWP 2022-1009

High Radiation Area and Very High Radiation Area Controls (IP Section 03.05) (3 Samples)

The inspectors evaluated licensee controls of the following high radiation areas and very high radiation areas:

- (1) Moisture separator area, turbine building 2, 729-foot elevation
- (2) Condensate demineralizer pipeway, turbine building 1, 656-foot elevation
- (3) Feed pump room C, turbine building 2, 676-foot elevation

Radiation Worker Performance and Radiation Protection Technician Proficiency (IP Section 03.06) (1 Sample)

(1) The inspectors evaluated radiation worker and radiation protection technician performance as it pertains to radiation protection requirements.

71124.06 - Radioactive Gaseous and Liquid Effluent Treatment

Walkdowns and Observations (IP Section 03.01) (5 Samples)

The inspectors evaluated the following radioactive effluent systems during walkdowns:

- (1) Unit 1, reactor building vent effluent radiation monitoring system
- (2) Unit 2, reactor building vent effluent radiation monitoring system
- (3) Unit 1, turbine building vent effluent radiation monitoring system
- (4) Standby gas treatment system vent effluent radiation monitoring system
- (5) Liquid radwaste discharge radiation monitor

Sampling and Analysis (IP Section 03.02) (4 Samples)

The inspectors evaluated the following effluent samples, sampling processes, and compensatory samples:

- (1) Weekly particulate and iodine sample collection from the Unit 1 reactor building vent effluent radiation monitoring system
- (2) Review of the VERMS particulate and iodine line losses analysis, EC-079-1034
- (3) Review of the unmonitored release analysis: systems identified in PLI-77223, EC ENVR-1008, for release pathways that have been determined to be "insignificant effluent pathways"
- (4) Review of recent changes to the site boundary (due to near-site construction activities) and recalculation of X/Q, D/Q, and maximum effluent release values

Dose Calculations (IP Section 03.03) (2 Samples)

The inspectors evaluated the following dose calculations:

- (1) Unit 2, reactor building vent weekly iodine and particulate activity, SC-234-112, completed on February 8, 2022
- (2) Unit 2, reactor building vent weekly iodine and particulate activity, SC-234-112, completed on April 5, 2022

OTHER ACTIVITIES - BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

BI01: Reactor Coolant System Specific Activity (IP Section 02.10) (2 Samples)

- (1) Unit 1 (January 1, 2021, through December 31, 2021)
- (2) Unit 2 (January 1, 2021, through December 31, 2021)

71153 - Follow Up of Events and Notices of Enforcement Discretion

Event Report (IP Section 03.02) (1 Sample)

The inspectors evaluated the following licensee event reports (LERs):

(1) LER 05000387and 05000388/2021-002-00, Inoperability of Computer Room Floor Cooling Fan Caused by Extended Operation with Worn Belts Due to Less Than Adequate Preventive Maintenance Replacement Interval (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21179A288): The inspection conclusions associated with this LER are documented in this report under the Inspection Results Section, Licensee-Identified Non-Cited Violation.

Personnel Performance (IP Section 03.03) (1 Sample)

(1) The inspectors evaluated the Unit 1 scram due to closure of the 'D' inboard main steam isolation valve and the licensee's response on May 23, 2022.

OTHER ACTIVITIES - TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

71003 - Post-Approval Site Inspection for License Renewal

Post-Approval Site Inspection for License Renewal (1 Sample)

- (1) The team conducted a Phase 1 license renewal inspection at Unit 1 from April 4 to 8, 2022. The following aging management programs were evaluated by the team:
 - Buried Piping/Tanks (AMP 26) Visual inspection of excavated B supply and return emergency service water piping (WO 2301238)
 - Supplemental Piping/Tanks (AMP 24) Remote visual inspection (VT-3) of inner diameter of downcomers VP-22, VP-37, VP-46, VP-52, VP-60, VP-66, VP-83, and VP-101 (WO 2382988)
 - HPCI/RCIC Turbine Casings (AMP 42) Visual inspection (VT-3) of highpressure coolant injection (HPCI) turbine casing inspection (WO 2337378)

<u>92702 - Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders</u>

The inspectors reviewed the licensee's response to NOV 05000388/2021012 and determined that the reason, corrective actions taken and planned to address recurrence, and the date when full compliance will be achieved for this violation is adequately addressed and captured on the docket.

The inspectors reviewed the licensee's condition reports CR-2021-03314 (which documented the NRC violations) and CR-2019-11140 (which documented the initial performance deficiencies and contained the licensee's cause analysis, extent of condition, generic implications, and corrective actions) in full. The inspectors determined that CR-2019-11140 fully addressed the performance deficiencies, and therefore, the NRC violations.

The inspectors reviewed objective evidence and verified that all corrective actions were timely and completed as stated. The inspectors verified that there has been no recurrence of the performance deficiencies since the completion of the corrective actions.

Impact of Financial Conditions on Continued Safe Performance

In that the licensee, Susquehanna Nuclear, LLC, and the licensee's parent company, Talen Energy Supply, was under bankruptcy protection/reorganization during the inspection period, NRC Region I conducted reviews of processes at Susquehanna. Using the flexibilities in the baseline inspection program, the inspectors evaluated several aspects of the licensee's operations to assess whether any identified plant performance issues could be related to the station's financial condition. The factors reviewed included: (1) impact on regulatory required plant staffing, (2) corrective maintenance backlog, (3) changes to the planned maintenance schedule, (4) corrective action program implementation, and (5) reduction in outage scope, including risk-significant modifications. In particular, the inspectors verified that licensee personnel continued to identify problems at an appropriate threshold and enter these problems into the corrective action program for resolution. The inspectors also verified that the licensee continued to develop and implement corrective actions commensurate with the safety significance of the problems identified.

The review of processes at Susquehanna included continuous reviews by the resident inspectors, as well as the specialist-led baseline inspections completed during the inspection period - 71124.01 - Radiological Hazard Assessment and Exposure Controls, 71111.08G - Inservice Inspection Activities (BWR), 71124.06 - Radioactive Gaseous and Liquid Effluent Treatment, 71003 - Post-Approval Site Inspection for License Renewal, and 92702 - Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders - which are documented previously in this report.

INSPECTION RESULTS

Licensee-Identified Non-Cited Violation: Inoperability of Computer Room	71153		
Floor Cooling Fan Caused by Extended Operation with Worn Belts Due to			
Less Than Adequate Preventive Maintenance Replacement Interval			
Resulted in a Condition Prohibited by Technical Specifications			

This violation of very low safety significance was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Violation: A Severity Level IV NCV of Units 1 and 2 Technical Specification (TS) 3.0.3 was licensee-identified when both divisions of the control structure ventilation system was inoperable from April 29 to 30, 2021. Specifically, upon station evaluation, it was determined that the inoperable condition existed for longer than allowed by TS Limiting Condition for Operation 3.0.3.

Significance/Severity: Severity Level IV. The Reactor Oversight Process significance determination process does not specifically consider a violation of requirements with no performance deficiency in its assessment of licensee performance. Therefore, it is necessary to address this violation which does not include an identified performance deficiency using traditional enforcement rather than assign a color (e.g., Green).

Section 6.1.d of the NRC Enforcement Policy provides examples of Severity Level IV violations. Section 6.1.d.1 states, in part, that failure to comply with the allowances for limiting condition for operation and surveillance requirement applicabilities in TS Section 3.0 is an example of a Severity Level IV violation.

The condition was documented in the corrective action program under CR-2021-07305 and CR-2021-07509.

The disposition of this violation closes LER 05000387 and 05000388/2021-002-00, "Inoperability of Computer Room Floor Cooling Fan Caused by Extended Operation with Worn Belts Due to Less Than Adequate Preventive Maintenance Replacement Interval."

EXIT MEETINGS AND DEBRIEFS

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

- On April 8, 2022, the inspectors presented the inservice inspection results to David Ambrose, General Manager of Engineering, and other members of the licensee staff.
- On April 8, 2022, the inspectors presented the Phase 1 license renewal inspection results to David Ambrose, General Manager of Engineering, and other members of the licensee staff.
- On April 14, 2022, the inspectors presented the radiological hazards assessment inspection results to Kevin Cimorelli, Site Vice President, and other members of the licensee staff.
- On May 19, 2022, the inspectors presented the radiological effluent technical specification inspection results to David Ambrose, General Manager of Engineering, and other members of the licensee staff.
- On July 28, 2022, the inspectors presented the integrated inspection results to Kevin Cimorelli, Site Vice President, and other members of the licensee staff.

THIRD PARTY REVIEWS

The inspectors reviewed the World Associations of Nuclear Operators report that was issued during the inspection period.

DOCUMENTS REVIEWED

Inspection	Туре	Designation	Description or Title	Revision or
Procedure				Date
71111.08G	Corrective Action	CR-2022-05692		04/05/2022
	Documents			
	Resulting from			
	Inspection			
	Procedures	ISI-LTP4-Plan	SSES Fourth Ten-Year Interval Inservice Inspection (ISI)	Revision 5
			and Third Ten-Year Interval Containment Inspection	
			(IWE/IWL) Program Plan	
71111.19	Work Orders	PCWO 1256448	U1 ESS 480V Transformer 1X240 Replacement	04/07/2022
		PCWO 2420917-0	Evidence of Service Water Pipe Leak in Unit 1 FPC Pump	04/19/2022
			Room	
		PCWO 2541280-0	D MSIV Troubleshooting and Repair	04/25/2022
		PCWO 2545223-0	A-D MSIV Troubleshooting and Repair	04/15/2022
		RACT 1810602	B MSIV Troubleshooting and Repair	04/25/2022
71111.22	Procedures	RTSV 2333239	SE-159-024 LLRT of D MSIV	03/31/2022
		RTSV 2373783	SE-159-022 LLRT of B MSIV	03/31/2022
		RTSV 2379320	SE-159-021 LLRT of A MSIV	03/31/2022
		RTSV 3473784	SE-159-023 LLRT of C MSIV	03/31/2022