

**Flaherty, James R.**

R4-5A36

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**From:** Ridlen, Jodie Y.  
**Sent:** Monday, August 02, 2004 6:32 AM  
**To:** CNS Senior Managers List; CNS Managers List; CNS SUPERVISORS List; CNS Shift Tech. Eng . List  
**Cc:** CNS Licensing List; Maddox, Kimberly  
**Subject:** FW: Update to IR 2004-014 Exit Minutes- Div. 2 SW Gland Water Supply Not Restored Following Maintenance

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**From:** Flaherty, James R.  
**Sent:** Friday, July 30, 2004 3:52 PM  
**To:** Ridlen, Jodie Y.  
**Subject:** FW: Update to IR 2004-014 Exit Minutes- Div. 2 SW Gland Water Supply Not Restored Following Maintenance

Attached below is an update to the minutes sent out earlier today. The updated section is in paragraph 2, sentences 3, 4, and 5 describing the SDP review sequence performed by the SRI and SRA.

Jim Flaherty

-----Original Message-----

**From:** Flaherty, James R.  
**Sent:** Friday, July 30, 2004 9:59 AM  
**To:** Ridlen, Jodie Y.  
**Subject:** IR 2004-014 Exit Minutes- Div. 2 SW Gland Water Supply Not Restored Following Maintenance

The Senior Resident Inspector provided the following characterization of the finding related to the issue on Service Water Gland Water Supply Not Being Restored Following Maintenance. 10CFR50 Appendix B, Criterion V states in part that activities affecting quality shall be prescribed by documented instructions, procedures, and drawings, and shall be accomplished in accordance with these instructions, procedures, or drawings. It also states instructions, procedures, or drawings shall include appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished.

For this condition, restoration of a safety related system is considered an important activity. Therefore, this issue is being proposed as a self-revealing apparent violation of 10CFR50 App. B Criterion V, in that the clearance order used did not provide adequate instructions to ensure the Division 2 service water gland water valve lineup was restored following maintenance. The SRI said the phase 1 SDP identified 2 cornerstones were affected, which led to a phase 2 review. They assumed 21 days for the condition and no credit for Operator recovery, which gave a safety significance result of Yellow. The SRI said that the phase 3 SDP had been performed but was not final as they understood we have vendor information to be considered. The phase 3 SDP performed by the Region 4 SRA determined that the safety significance is >Green, with final significance to be determined. The performance deficiency was the failure to establish appropriate procedure guidance following maintenance. As a result, Division 2 gland water supply from Division 1 caused a co-dependency on Division 1 for operability. It is considered >Minor since it affected the reliability of the service water system.

Loss of Service Water is in both the Initiating Events and Mitigating Systems cornerstones. The SRI said they have not determined which one will be the primary cornerstone for reporting, but it will be treated as a single entry in the PIM, with the primary entry in one cornerstone and by reference in the other one. It will be documented in Inspection Report 2004-014 and covered inspection activities during the period February 11 to July 22, 2004. This is considered to be a separate report, not a special report, in order to expedite resolution of the issue.

Attendees:

NRC- Scott Schwind, Steve Cochrum  
NPPD- Kim Dahlberg, Todd Hottovy, Kent Sutton, Jerry Roberts, Paul Fleming, Kevin Chambliss, Mark Schaible, Roman Estrada, Gary Kline, Jim Flaherty