

Section 3. Minor Questions

A finding should be compared to Appendix E examples to determine if it is similar to a minor example. If not, then answer the following questions to determine if the finding is more than minor.

Is the finding associated with one of the cornerstone attributes listed at the end of this attachment and does the finding affect the associated cornerstone objective?

If so, then the finding is more than minor if any of the following questions are answered in the affirmative.

- 1) Could the finding be reasonably viewed as a precursor to a significant event?
- 2) If left uncorrected would the finding become a more significant safety concern?
- 3) Does the finding relate to a performance indicator (PI) that would have caused the PI to exceed a threshold?
- 4) **For occupational radiation safety cornerstone findings, did the condition actually result in unintended exposure in excess of the planned exposure for the job? Did radiation workers react inappropriately to unexpected indications from personnel dosimetry?**
- 5) Does the finding relate to any of the following maintenance risk assessment and risk management issues?
 - a) Licensee risk assessment failed to consider risk significant SSCs and support systems (included in Table 2 of the plant specific Phase 2 SDP risk informed inspection notebook) that were unavailable during the maintenance.
 - b) Licensee risk assessment failed to consider unavailable SSCs such as Residual Heat Removal Systems (PWR and BWR) that prevent or mitigate Interfacing System LOCAs.
 - c) Licensee risk assessment failed to consider SSCs that prevent containment failure such as containment isolation valves (BWR & PWR), BWR drywell/containment spray/containment flooding systems, and PWR containment sprays and fan coolers.
 - d) Licensee risk assessment failed to consider unusual external conditions that are present or imminent (e.g., severe weather, offsite power instability).
 - e) Licensee risk assessment failed to consider maintenance activities that could increase the likelihood of initiating events such as work in the electrical switchyard (increasing the likelihood of a loss of offsite power) and RPS testing (increasing the likelihood of a reactor trip).
 - f) Licensee risk assessment failed to consider the uncompensated removal or impairment of plant internal and/or external flood barriers.

- g) Licensee risk assessment failed to account for any unavailability of a single train of a system (primary or back-up) that provides a shutdown key safety function.
- h) Licensee's risk assessment has known errors or incorrect assumptions that have the potential to change the outcome of the assessment.
- i) Licensee failed to implement any prescribed significant compensatory measures or failed to effectively manage those measures.