

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION II 245 PEACHTREE CENTER AVENUE NE, SUITE 1200 ATLANTA, GEORGIA 30303-1257

July 25, 2014

Mr. Ernie Kapopoulos, Jr. Vice President Duke Energy Progress, Inc. Shearon Harris Nuclear Power Plant P. O. Box 165, Mail Code: Zone 1 New Hill, NC 27562-0165

SUBJECT: SHEARON HARRIS NUCLEAR POWER PLANT - NRC INTEGRATED

INSPECTION REPORT 05000400/2014003

Dear Mr. Kapopoulos:

On June 30, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Shearon Harris nuclear power plant Unit 1. The enclosed inspection report documents the inspection results which were discussed on July 21, 2014, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

One NRC-identified finding of very low safety significance (Green) was identified during this inspection. This finding did not involve a violation of NRC requirements.

If you contest this finding, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Inspector at Shearon Harris facility.

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 Regional Administrator, Region II; and the NRC Resident Inspector at Shearon Harris facility.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Document Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

George T. Hopper, Chief Reactor Projects Branch 4 Division of Reactor Projects

Docket No.: 50-400 License No.: NPF-63

Enclosure: NRC Inspection Report 05000400/2014003

w/Attachment: Supplemental Information

cc Distribution via ListServ

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Letter to Ernest J. Kapopoulos, Jr. from George T. Hopper dated July 25, 2014.

SUBJECT: SHEARON HARRIS NUCLEAR POWER PLANT - NRC INTEGRATED INSPECTION REPORT 05000400/2014003

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 50-400

License No.: NPF-63

Report No.: 05000400/2014003

Licensee: Duke Energy Progress, Inc.

Shearon Harris Nuclear Power Plant, Unit 1

Facility:

5413 Shearon Harris Road

Location: New Hill, NC 27562

Dates: April 1, 2014 through June 30, 2014

Inspectors: J. Austin, Senior Resident Inspector

P. Lessard, Resident Inspector

S. Sanchez, Senior Emergency Preparedness Inspector (Sections

1EP2, 1EP3, 1EP4, 1EP5, 4OA1, 4OA6)

M. Speck, Senior Emergency Preparedness Inspector (Sections 1EP2,

1EP3, 1EP4, 1EP5, 4OA1, 4OA6)

Approved by: George T. Hopper, Chief

Reactor Projects Branch 4 Division of Reactor Projects

SUMMARY OF FINDINGS

Inspection Reports 05000400/2014-003: Duke Energy Progress, Inc.; April 1, 2014 – June 30, 2014; Shearon Harris Nuclear Power Plant, Unit 1; Plant Modifications.

The report covers a three-month period of inspection by resident inspectors and two emergency preparedness inspectors. One NRC-identified finding of very low safety significance (Green) was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, issued June 19, 2012 "Significance Determination Process" (SDP). The cross-cutting aspects were determined using IMC 0310, "Aspects Within the Cross-Cutting Areas," issued December 19, 2013. All violations of NRC requirements are dispositioned in accordance with the NRC's Enforcement Policy dated January 28, 2013. The NRC's program for overseeing the safe operations of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process", Revision 4.

NRC-Identified and Self-Revealing Findings

Cornerstone: Initiating Events

• Green. The inspectors identified a finding of very low safety significance (Green) when the licensee did not adequately implement the procedural requirements of ADM-NGGC-0106, "Configuration Management Program Implementation," during the installation of a temporary modification to install temporary air compressors on May 31, 2014. The licensee entered the issue into their Corrective Action Program (CAP) as Action Request (AR) #690371 and revised procedure OP-151.01 several times to address the procedural issues.

The inspectors determined that the failure to adequately implement ADM-NGGC-106 was a performance deficiency. This performance deficiency was determined to be more than minor in accordance with IMC 0612, Appendix B, because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, ADM-NGGC-0106, Section 9.2.39A, was not adequately implemented which resulted in OP-151.01, Attachment 7 being inadequate to implement a temporary modification for the use of three temporary air compressors supplying plant air to equipment and components which can cause plant transients. Using IMC 0609, Significance Determination Process, Appendix A, Exhibit 1- Initiating Events Screening Questions, the inspectors determined this finding to be of very low safety significance (Green) because the finding did not involve the complete or partial loss of a support system that contributes to the likelihood of, or cause an initiating event and affected mitigation equipment. The finding had a cross-cutting aspect of Consistent Process, as described in the Human Performance cross-cutting area because the licensee failed to comply with ADM-NGGC-106 and correct the inadequate operating procedure (H.13).

REPORT DETAILS

Summary of Plant Status

Unit 1 was shut down on May 15, 2014, for a planned maintenance outage and restored to rated thermal power (RTP) on May 23, 2014. With that exception, Unit 1 operated at or near RTP for the entire inspection period.

REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection

.1 Offsite and Alternate AC Power Readiness

a. Inspection Scope

The inspectors performed a review of the licensee's preparations for summer weather for selected systems, including conditions that could lead to an extended drought as a result of high temperatures. During the inspection, the inspectors focused on plant specific design features and the licensee's procedures used to mitigate or respond to adverse weather conditions. Additionally, the inspectors reviewed the Updated Final Safety Analysis Report (UFSAR) and performance requirements for systems selected for inspection, and verified that operator actions were appropriate as specified by plant specific procedures. Specific documents reviewed during this inspection are listed in the Attachment. The inspectors also reviewed CAP items to verify that the licensee was identifying adverse weather issues at an appropriate threshold and entering them into their CAP in accordance with station corrective action procedures. The inspectors' reviews focused specifically on the following plant systems:

- Plant Switchyard
- Startup Transformers

The inspectors reviewed the following ARs associated with this area to verify that the licensee identified and implemented appropriate corrective actions:

- AR #689621, Site Vulnerability for NFPA 805 Compliance in Switchyard
- AR #686643, "B" SUT Scheduled Outage Exceeded Estimated Time

b. <u>Findings</u>

No findings were identified.

1R04 Equipment Alignment

.1 Quarterly Partial System Walkdowns

a. Inspection Scope

The inspectors performed three partial system walkdowns of the following risk-significant systems:

- "A" emergency diesel generator (EDG) while the "B" EDG was inoperable due to a planned maintenance outage on April 9, 2014
- The "A" and "B" motor driven auxiliary feedwater (AFW) pump train while the turbine driven AFW pump train was out-of-service for a planned maintenance outage on April 15, 2014
- The "A" and "B" EDG Lube Oil Systems on June 26, 2014

The inspectors selected these systems based on their risk-significance relative to the reactor safety cornerstones at the time they were inspected. The inspectors attempted to identify any discrepancies that could impact the function of the system and, therefore, potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, applicable portions of the UFSAR, Technical Specification (TS) requirements, outstanding work orders, condition reports, and the impact of ongoing work activities on redundant trains of equipment in order to identify conditions that could have rendered the systems incapable of performing their intended functions. The inspectors also walked down accessible portions of the systems to verify system components and support equipment were aligned correctly and operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no obvious deficiencies. The inspectors also verified that the licensee had properly identified and resolved equipment alignment problems that could cause initiating events or impact the capability of mitigating systems or barriers and entered them into the CAP with the appropriate significance characterization. Documents reviewed are listed in the Attachment.

b. Findings

No findings were identified.

1R05 Fire Protection

.1 Quarterly Resident Inspector Tours

a. Inspection Scope

The inspectors conducted five fire protection walkdowns which were focused on availability, accessibility, and the condition of firefighting equipment in the following risk-significant plant areas:

- Reactor Auxiliary Building (RAB), 216' Elevation, Mechanical Penetration Area
- RAB, 236' Elevation, Component Cooling Water and AFW Area
- RAB, Elevation 236', "C" Charging Safety Injection Pump (CSIP) Transfer and CSIP Rooms and Residual Heat Removal Heat Exchanger Rooms
- RAB, Elevation 261', Water Chiller Area A and B
- RAB, Elevation 261', Alternate Seal Injection Pump Room

The inspectors reviewed areas to assess if the licensee had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant, effectively maintained fire detection and suppression capability, maintained passive fire protection features in good material condition, and had implemented adequate compensatory measures for out-of-service, degraded or inoperable fire protection equipment, systems, or features in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall contribution to fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to impact equipment which could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the attachment, the inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use; that fire detectors and sprinklers were unobstructed, that transient material loading was within the analyzed limits; and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's CAP.

The inspectors reviewed the following ARs associated with this area to verify that the licensee identified and implemented appropriate corrective actions:

- AR #653375, Prohibited Transient Combustibles Inside Power Block
- AR #654142, Transient Combustible Controls
- AR #674352, Transient Combustibles And Housekeeping in the RAB
- AR #675036, Nuclear Oversight Finding: Transient Combustible Control

b. <u>Findings</u>

No findings were identified.

.2 Annual Fire Protection Drill Observation

a. Inspection Scope

On April 30, 2014, the inspectors observed fire brigade performance during an announced fire drill which simulated a fire in the Waste Processing Building. The observation was used to determine the readiness of the plant fire brigade to fight fires. The inspectors verified that the licensee staff identified deficiencies; openly discussed them in a self-critical manner at the drill debrief, and took appropriate corrective actions. Specific attributes evaluated were:

- Proper wearing of turnout gear and self-contained breathing apparatus
- Proper use and layout of fire hoses
- Employment of appropriate firefighting techniques
- Sufficient firefighting equipment brought to the scene
- Effectiveness of fire brigade leader communications, command, and control
- Search for victims and propagation of the fire into other plant areas
- Smoke removal operations
- Utilization of preplanned strategies
- Adherence to the preplanned drill scenario
- Fulfillment of drill objectives

b. Findings

No findings were identified.

1R11 Licensed Operator Regualification Program

.1 Quarterly Review

a. <u>Inspection Scope</u>

On June 24, 2014, the inspectors observed a crew of licensed operators in the plant's simulator during licensed operator requalification examinations to verify that operator performance was adequate, evaluators were identifying and documenting crew performance problems and training was being conducted in accordance with licensee procedures. The inspectors evaluated the following areas:

- Licensed operator performance
- Crew's clarity and formality of communications
- Ability to take timely and conservative actions
- Prioritization, interpretation, and verification of annunciator alarms
- Correct use and implementation of abnormal and emergency procedures
- Control board manipulations
- Oversight and direction from supervisors
- Ability to identify and implement appropriate TS actions and emergency plan actions and notifications

The crew's performance in these areas was compared to pre-established operator action expectations and successful critical task completion requirements.

b. Findings

No findings were identified.

.2 Licensed Operator Performance in the Actual Plant/Main Control Room

a. Inspection Scope

On May 21, 2014, the inspectors observed operators in the plant's main control room during a reactor startup after a planned maintenance outage. The inspectors evaluated the following areas:

- Operator compliance and use of plant procedures, including procedure entry and exit, performing procedure steps in the proper sequence, procedure place-keeping; and TS entry and exit
- Control board/in-plant component manipulations
- Communications between crew members
- Use and interpretation of plant instruments, indications, and alarms; diagnosis of plant conditions based on instruments, indications, and alarms
- Use of human error prevention techniques, such as pre-job briefs and peer checking
- Documentation of activities, including initials and sign-offs in procedures, control room logs, TS entry and exit, entry into out-of-service logs
- Management and supervision of activities, including risk management and reactivity management

b. Findings

No findings were identified.

1R12 <u>Maintenance Effectiveness</u>

a. <u>Inspection Scope</u>

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the system. In addition, the inspectors verified maintenance effectiveness issues were entered into the CAP with the appropriate significance characterization. Documents reviewed are listed in the Attachment. The inspectors evaluated degraded performance issues involving the following risk significant components:

- AR #683966, Abnormal Operating Procedure (AOP-12) Partial Loss of Condenser Vacuum was entered when "A" Circulating Water Pump tripped off
- AR #682877, Breaker 1D1-3A (Motor Control Center 1D11 Supply Breaker) failed to open manually

The inspectors focused on the following attributes:

- Implementing appropriate work practices
- Identifying and addressing common cause failures

- Scoping of systems in accordance with 10 CFR 50.65(b) of the maintenance rule
- Characterizing system reliability issues for performance
- Counting unavailability time during performance of maintenance
- Trending key parameters for condition monitoring
- Ensuring 10 CFR 50.65(a)(1) or (a)(2) classification or re-classification
- Verifying appropriate performance criteria for structures, systems, and components (SSCs)/functions classified as (a)(2) are appropriate and adequate goals and corrective actions for systems classified as (a)(1)

b. Findings

No findings were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

The inspectors reviewed the licensee's evaluation and management of plant risk for the maintenance and emergent work activities affecting risk-significant equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- Elevated Green risk during a planned maintenance outage on the "B" EDG on April 9, 2014
- Elevated Green risk during a planned maintenance on the Turbine Driven Auxiliary Feedwater (TDAFW) pump on April 15, 2014
- Elevated Green risk while testing the "B" Solid State Protection System on April 16, 2014
- Yellow risk condition while the "B" feed regulating valve was in manual to support narrow range level testing on the "B" steam generator on April 30, 2014
- Yellow risk condition during the planned reactor plant shutdown that occurred on May 15-16, 2014

These activities were selected based on their potential risk significance relative to the reactor safety cornerstones. As applicable for each activity, the inspectors verified that risk assessments were performed as required by 10 CFR 50.65(a)(4) and were accurate and complete. When emergent work was performed, the inspectors verified that the plant risk was promptly reassessed and managed. The inspectors reviewed the scope of maintenance work, discussed the results of the assessment with the licensee's probabilistic risk analyst or shift technical advisor, and verified plant conditions were consistent with the risk assessment. The inspectors also reviewed TS requirements and walked down portions of redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met.

b. Findings

No findings were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors selected the following five potential operability issues based on the risk significance of the associated components and systems. The inspectors evaluated the technical adequacy of the evaluations to ensure that TS operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the TS and UFSAR to the licensee's evaluations, to determine whether the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations. Additionally, the inspectors also reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations.

- AR #680165, Concerns with Dresser Coupling Gaskets for the "A" EDG
- AR #687795, Dewpoint on "B" EDG Starting Air
- AR #680768, Through Wall Leak on "B" EDG Right Bank Turbo Jacket Water Adapter
- AR #678486, "A" EDG Fuel Oil Supply and Rocker Arm Support Broken Bolt
- AR #689314, 1SW-271 Emergency Service Water (ESW) Leak-by Present during Dynamic Test Header "B" Return to Auxiliary Reservoir

b. <u>Findings</u>

No findings were identified.

1R18 Plant Modifications

a. Inspection Scope

The following engineering design package was reviewed and selected aspects were discussed with engineering personnel:

• Engineering Change (EC) #89462, "C" Air Compressor Replacement

This document and related documentation were reviewed for adequacy of the associated 10 CFR 50.59 safety evaluation screening, consideration of design parameters, implementation of the modification, post-modification testing, and relevant procedures, design, and licensing documents were properly updated. The inspectors

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observed ongoing and completed work activities to verify that installation was consistent with the design control documents. The modification was to replace the existing "C" air compressor with a new compressor.

b. Findings

<u>Introduction</u>: The inspectors identified a finding of very low safety significance (Green) for the licensee's failure to adequately implement the procedural requirements of ADM-NGGC-0106, "Configuration Management Program Implementation," during the installation of a temporary modification to install temporary air compressors on May 31, 2014.

Description: Using the guidance of ADM-NGGC-0106, the licensee developed Engineering Change (EC) 89462 to replace the "C" air compressor. As a part of the configuration management program, ADM-NGGC-0106, Section 9.2.39A, directs "the authorizing procedure shall have been reviewed by Engineering to perform verification of the adequacy of the authorized changes." During the replacement of "C" air compressor, three temporary air compressors were installed to support the permanently installed in-service plant/instrument air systems. During a plant walkdown on May 31, 2014, the inspectors challenged the adequacy of plant procedure OP-151.01, Attachment 7, "Placing Temporary Air Compressor in Service," in support of the modification. Specifically, inspectors determined that the licensee failed to consider the effects of a loss of offsite power relative to compressor response, additional plant risk while temporary compressors are in service, effects on the installed plant air dryers, required operator training, abnormal operating procedures, replenishment of the diesel driven air compressor fuel oil, and emergency response procedures. The licensee installed three temporary air compressors without understanding potential interactions with permanent plant equipment and consequences during transients. ADM-NGGC-0106, Section 9.2.39A, was not adequately implemented prior to the installation of the temporary air compressors. As a result, the licensee failed to make the appropriate changes to OP-151.01, Attachment 7, "Placing Temporary Air Compressor in Service." The licensee entered the issue into their CAP as AR #690371 and then revised OP-151.01 several times to address the procedural issues.

Analysis: The inspectors determined that the failure to adequately implement ADM-NGGC-106 was a performance deficiency. Specifically, ADM-NGGC-106, Section 9.2.39A, states in part, that "the authorizing procedure shall have been reviewed by Engineering to perform verification of the adequacy of the authorized changes." However, the licensee revised OP-151.01 to allow three temporary air compressors without adequately performing the required verification review. The use of plant procedure OP-151.01, Attachment 7 to implement the temporary modification was not implemented as described in procedure ADM-NGGC-106, Section 9.2.39, "Controlled by Adequate Procedure."

The performance deficiency was determined to be more than minor in accordance with IMC 0612, Appendix B, because, if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, ADM-NGGC-0106, Section 9.2.39A, was

not adequately implemented which resulted in OP-151.01, Attachment 7 being inadequate to implement a temporary modification for the use of three temporary air compressors supplying plant air to equipment and components which can cause plant transients. Using IMC 0609, Significance Determination Process, Appendix A, Exhibit 1-Initiating Events Screening Questions, the inspectors determined this finding to be of very low safety significance (Green) because the finding did not involve the complete or partial loss of a support system that contributes to the likelihood of, or cause an initiating event and affected mitigation equipment. The finding had a cross-cutting aspect of Consistent Process, as described in the Human Performance cross-cutting area because the licensee failed to comply with ADM-NGGC-106 and correct the inadequate operating procedure (H.13).

<u>Enforcement</u>: This issue does not involve enforcement action because no violation of a regulatory requirement was identified. The licensee entered these issues into the CAP as AR #693922. Because this performance deficiency does not involve a violation of regulatory requirements and has very low safety significance, it is identified as finding: FIN 05000400/2014003-01, Failure to Adequately Implement a Plant Modification.

1R19 Post Maintenance Testing

a. Inspection Scope

The inspectors reviewed the following five post-maintenance test (PMT) activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

| <u>Procedure</u> | <u>Title</u> | Related Maintenance Activity | <u>Date</u> |
|------------------|--|--|----------------|
| OST-1073 | "B" EDG Operability Test, Monthly Interval, Modes 1-6 | Work Order (WO) #13323656, Minor Fuel Oil Leak/Verify Fuel Oil Pump Discharge Pressure on the "B" EDG | April 10, 2014 |
| OST-1080 | Turbine Driven Auxiliary Feedwater (TDAFW) Pump Full Flow Test Quarterly Interval | WO #1836551, Rebuild Hydramotor Actuator for 1AF-131 (TDAFW Pump Flow Control Valve "C") and Replace Starting Capacitor | April 15, 2014 |
| OP-145 | Component Cooling Water | WO #2170056, Perform PM-E0025: Electrical Preventive Maintenance for 6.9KV Motors | April 23, 2014 |
| OP-138 | Circulating Water | WO #13381748, Remove/Reinstall "A" Circulating Water Pump, following Pump Trip | May 9, 2014 |
| OP-156 | Dedicated Shutdown Diesel Generator | WO #13363139, Remove Ground Fault Caused by Failed Heater Coil EHC-28 | May 19, 2014 |

These activities were selected based upon the structure, system, or component's ability to impact risk. The inspectors evaluated these activities for the following: the effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed; acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate; tests were performed as written in accordance with properly reviewed and approved procedures; equipment was returned to its operational status following testing, and test documentation was properly evaluated. The inspectors evaluated the activities against TS and the UFSAR to ensure that the test results adequately ensured that the equipment met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with post-maintenance tests to determine whether the licensee was identifying problems and entering them in the CAP and that the problems were being corrected commensurate with their importance to safety. Documents reviewed are listed in the Attachment.

b. <u>Findings</u>

No findings were identified.

1R20 Refueling and Outage Activities

For the outage that began on May 15, 2014, and ended on May 23, 2014, the inspectors evaluated licensee outage activities as described below to verify that the licensee considered risk in developing outage schedules, adhered to administrative risk reduction methodologies they developed to control plant configuration, and adhered to operating license and TS requirements that maintained defense-in-depth. The inspectors also verified that the licensee developed mitigation strategies for losses of the following key safety functions:

- Decay heat removal
- Inventory control
- Power availability
- Reactivity control
- Containment integrity

.1 Review of Outage Plan

a. <u>Inspection Scope</u>

Prior to the outage, the inspectors reviewed the outage risk control plan to verify that the licensee had performed adequate risk assessments, and had implemented appropriate risk-management strategies when required by 10 CFR 50.65(a)(4).

b. Findings

No findings were identified.

.2 Monitoring of Shutdown Activities

a. Inspection Scope

The inspectors observed portions of the reactor shutdown to verify that appropriate procedures were followed.

b. Findings

No findings were identified.

.3 <u>Licensee Control of Outage Activities</u>

a. Inspection Scope

During the outage, the inspectors observed the items or activities described below to verify that the licensee maintained defense-in-depth commensurate with the outage risk-control plan for key safety functions and applicable technical specifications when taking equipment out-of-service.

- Clearance Activities
- Reactor Coolant System Instrumentation
- Electrical Power
- Decay Heat Removal (DHR)
- Reactivity Control
- Containment Closure

The inspectors also reviewed responses to emergent work and unexpected conditions to verify that resulting configuration changes were controlled in accordance with the outage risk control plan, and to verify that control room operators were kept cognizant of the plant configuration.

b. Findings

No findings were identified.

.4 Monitoring of Heatup and Startup Activities

a. <u>Inspection Scope</u>

Prior to mode changes and on a sampling basis, the inspectors reviewed system lineups and/or control board indications to verify that TSs, license conditions, and other requirements, commitments, and administrative procedure prerequisites for mode changes were met prior to changing modes or plant configurations.

b. Findings

No findings were identified.

Enclosure

.5 Identification and Resolution of Problems

a. Inspection Scope

Periodically, the inspectors reviewed the items that had been entered into the CAP to verify that the licensee had identified problems related to outage activities at an appropriate threshold and had entered them into the CAP. For selected issues documented in the CAP, inspectors reviewed the results of the investigations to verify that the licensee had determined the appropriate cause and implemented corrective actions, as required by 10 CFR 50, Appendix B, Criterion XVI, Corrective Action.

b. Findings

No findings were identified.

1R22 <u>Surveillance Testing</u>

.1 Routine Surveillance Testing

a. Inspection Scope

For the five surveillance tests below, the inspectors observed the surveillance tests and/or reviewed the test results for the following activities to verify the tests met TS surveillance requirements, UFSAR commitments, in-service testing requirements, and licensee procedural requirements. The inspectors assessed the effectiveness of the tests in demonstrating that the SSCs were operationally capable of performing their intended safety functions.

- RST-209, TS Surveillance of New Diesel Fuel Oil on April 1, 2014
- MST-I0320, Train B Solid State Protection System Actuation Logic and Master Relay Test on April 16, 2014
- OST-1006, Boration System Operability Monthly Interval Modes 1-6
- OST-1021, Daily Surveillance Requirements Daily Interval Mode 1 and 2 on May 8, 2014
- OST-1007, Chemical and Volume Control System/Safety Injection Train "A" Quarterly Interval, Modes 1-4 on May 28, 2014

The inspectors reviewed the following ARs associated with this area to verify that the licensee identified and implemented appropriate corrective actions:

- AR #681197, Non-Compliance with UFSAR for Diesel Fuel Receipt
- AR #689590, Work Activity not Completed by Late Date

b. Findings

No findings were identified.

.2 In service Testing (IST) Surveillance

a. Inspection Scope

The inspectors reviewed the performance of OST-1089, EDG Starting Air Dryer Check Valve Operability Test Quarterly Interval, Modes 1-6 on April 26, 2014, to evaluate the effectiveness of the licensee's American Society of Mechanical Engineers (ASME) Section XI testing program for determining equipment availability and reliability. This surveillance satisfied the IST requirements for the "A" train Starting Air Dryer Check Valves (1EA-4 and 1EA-19). The inspectors evaluated selected portions of the following areas:

- Testing procedures and methods
- Acceptance criteria
- Compliance with the licensee's IST program, TS, selected licensee commitments, and code requirements
- Range and accuracy of test instruments
- Required corrective actions

b. Findings

No findings were identified.

Cornerstone: Emergency Preparedness

1EP2 Alert and Notification System Evaluation

a. Inspection Scope

The inspectors evaluated the adequacy of the licensee's methods for testing the alert and notification system in accordance with NRC Inspection Procedure 71114, Attachment 02, Alert and Notification System (ANS) Testing. The applicable planning standard, 10 CFR 50.47(b)(5) and its related 10 CFR Part 50, Appendix E, Section IV.D requirements were used as reference criteria. The criteria contained in NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Revision 1, were also used as a reference.

The inspectors reviewed various documents which are listed in the Attachment. Inspectors interviewed personnel involved with siren system maintenance. This inspection activity satisfied one inspection sample for the alert and notification system on a biennial basis.

b. Findings

No findings were identified.

1EP3 Emergency Response Organization Staffing and Augmentation System

a. Inspection Scope

The inspectors reviewed the licensee's Emergency Response Organization (ERO) augmentation staffing requirements and process for notifying the ERO to ensure the readiness of key staff for responding to an event and timely facility activation. The qualification records of key position ERO personnel were reviewed to ensure all ERO qualifications were current. A sample of problems identified from augmentation drills or system tests performed since the last inspection was reviewed to assess the effectiveness of corrective actions.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 03, Emergency Response Organization Staffing and Augmentation System. The applicable planning standard, 10 CFR 50.47(b)(2), and its related 10 CFR Part 50, Appendix E requirements were used as reference criteria.

The inspectors reviewed various documents which are listed in the Attachment. This inspection activity satisfied one inspection sample for the ERO staffing and augmentation system on a biennial basis.

b. <u>Findings</u>

No findings were identified.

1EP4 Emergency Action Level and Emergency Plan Changes

a. <u>Inspection Scope</u>

Since the last NRC inspection of this program area, no changes have been made to the Radiological Emergency Plan and one change made to the Emergency Action Levels. The licensee also made several changes to emergency plan implementing procedures and determined that, in accordance with 10 CFR 50.54(q), the changes made in these revisions resulted in no reduction in the effectiveness of the Plan, and that the Plan continued to meet the requirements of 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50. The inspectors conducted a sampling of the implementing procedure changes made between October 1, 2013, and March 31, 2014, to evaluate for potential reductions in the effectiveness of the Plan. However, this review was not documented in a Safety Evaluation Report and does not constitute formal NRC approval of the changes. Therefore, these changes remain subject to future NRC inspection in their entirety. The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, Emergency Action Level and Emergency Plan Changes. The applicable planning standards of 10 CFR 50.47(b), and its related requirements in 10 CFR Part 50, Appendix E, were used as reference criteria.

The inspectors reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the emergency action level and emergency plan changes on an annual basis.

b. Findings

No findings were identified.

1EP5 Maintenance of Emergency Preparedness

a. <u>Inspection Scope</u>

The inspectors reviewed the corrective actions identified through the Emergency Preparedness program to determine the significance of the issues, the completeness and effectiveness of corrective actions, and to determine if issues were recurring. The licensee's post-event action reports, self-assessments, and audits were reviewed to assess the licensee's ability to be self-critical, thus avoiding complacency and degradation of their emergency preparedness program. Inspectors reviewed the licensee's 10 CFR 50.54(q) change process, personnel training, and selected screenings and evaluations to assess adequacy. The inspectors toured facilities and reviewed equipment and facility maintenance records to assess licensee's adequacy in maintaining them. The inspectors evaluated the capabilities of seismic instrumentation to adequately support Emergency Action Level (EAL) declarations.

The inspection was conducted in accordance with NRC Inspection Procedure 71114.05, Maintenance of Emergency Preparedness. The applicable planning standards, related 10 CFR Part 50, Appendix E requirements, and 10 CFR 50.54(q) and (t) were used as reference criteria.

The inspectors reviewed various documents which are listed in the Attachment. This inspection activity satisfied one inspection sample for the maintenance of emergency preparedness on a biennial basis.

b. <u>Findings</u>

No findings were identified.

1EP6 Emergency Planning Drill Evaluation

a. Inspection Scope

The inspectors observed an emergency preparedness drill conducted on June 3, 2014, to verify licensee self-assessment of classification, notification, and protective action recommendation development in accordance with 10 CFR Part 50, Appendix E. This drill tested the licensee's ability to respond to a failed reactor trip followed by a steam generator tube rupture.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

To verify the accuracy of the PI data reported to the NRC, the inspectors compared the licensee's basis in reporting each data element to the PI definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7.

.1 <u>Mitigating Systems Cornerstone</u>

Safety System Functional Failures

The inspectors reviewed licensee submittals for the Safety System Functional Failures performance indicator for the period from the second quarter 2013 through the first quarter 2014. The inspectors reviewed the licensee's operator narrative logs, operability assessments, maintenance rule records, maintenance work orders, issue reports, event reports and NRC Integrated Inspection reports for the period to validate the accuracy of the submittals.

b. <u>Findings</u>

No findings were identified.

.2 <u>Barrier Integrity Cornerstone</u>

Reactor Coolant System (RCS) Specific Activity

The inspectors reviewed licensee submittals for the Reactor Coolant System Specific Activity performance indicator for the period from the second quarter 2013 through the first quarter 2014. The inspectors reviewed the licensee's RCS chemistry samples, TS requirements, issue reports, and event reports for the period to validate the accuracy of the submittals. In addition to record reviews, the inspectors observed a chemistry technician obtain and analyze a reactor coolant system sample.

Reactor Coolant System Leakage

The inspectors sampled licensee submittals for the Reactor Coolant System Leakage performance indicator for the period from the second quarter 2013 through the first quarter 2014. The inspectors reviewed the licensee's operator logs, RCS leakage tracking data, issue reports, and event reports for the period to validate the accuracy of

the submittals.

b. Findings

No findings were identified.

.3 Emergency Preparedness Cornerstone

The inspectors sampled licensee submittals relative to the PIs listed below for the period April 1, 2013, through December 31, 2013. To verify the accuracy of the PI data reported during that period, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, was used to confirm the reporting basis for each data element.

- ERO Drill/Exercise Performance
- ERO Drill Participation
- Alert and Notification System Reliability

For the specified review period, the inspectors examined data reported to the NRC, procedural guidance for reporting PI information, and records used by the licensee to identify potential PI occurrences. The inspectors verified the accuracy of the PI for ERO drill and exercise performance through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for alert and notification system reliability through review of a sample of the licensee's records of periodic system tests. The inspectors also interviewed the licensee personnel who were responsible for collecting and evaluating the PI data. Licensee procedures, records, and other documents reviewed within this inspection area are listed in the Attachment. This inspection satisfied three inspection samples for PI verification on an annual basis.

b. Findings

No findings were identified.

4OA2 Identification and Resolution of Problems

.1 Routine Review of Items Entered Into the Corrective Action Program

a. <u>Inspection Scope</u>

To aid in the identification of repetitive equipment failures or specific human performance issues for follow-up, the inspectors performed frequent screenings of items entered into the licensee's CAP. The review was accomplished by reviewing daily AR reports.

b. Findings

No findings were identified.

.2 Semi-Annual Trend Review

a. Inspection Scope

The inspectors performed a review of the licensee's CAP and associated documents to identify trends that could indicate the existence of a more significant safety issue. The inspectors' review was focused on repetitive equipment issues, but also considered the results of daily inspector CAP item screening discussed in Section 4OA2.1 above, licensee trending efforts, and licensee human performance results. The inspectors' review nominally considered the six month period of January 1, 2014, through June 30, 2014, although some examples expanded beyond those dates where the scope of the trend warranted.

The review also included issues documented outside the normal CAP in major equipment problem lists, repetitive and/or reworks maintenance lists, departmental problem/challenges lists, system health reports, quality assurance audit/surveillance reports, self-assessment reports, and maintenance rule assessments. The inspectors compared and contrasted their results with the results contained in the licensee's CAP trending reports. Corrective actions associated with a sample of the issues identified in the licensee's trending reports were reviewed for adequacy.

b. <u>Findings</u>

No findings were identified.

The inspectors identified that an adverse trend exists associated with the licensee's surveillance test program. Specifically, the failure to adequately implement surveillance tests as required by TS has resulted in several adverse issues. The following items are examples of this trend:

- AR # 648982, Unidentified Failure of RST-202, Hydrogen and Oxygen Surveillance of the Waste Gas System
- AR # 665844, Evaluate Enhancement to OST-1023, Off-Site Power Availability Verification and OST-1024, On-Site Power Distribution Verification
- AR # 673961, Missed Surveillance EDG New Fuel Receipt
- AR #630080, MST-I0147, Containment Ventilation Isolation Area Radiation Monitors Relay Actuation Logic Test, not Completed by Past Due Date

This trend was entered into the licensee's CAP as AR #695226.

.3 Selected Issue Follow-up Inspection: Non-Safety Electrical Bus Functionality

a. Inspection Scope

The inspectors selected AR #670076, Non-Safety Electrical Bus Functionality for detailed review. This AR was associated with a functionality assessment that was performed in response to multiple grounds and elevated voltages identified on non-safety electrical buses. The inspectors reviewed this report to verify that the licensee identified the full extent of the issue, performed an appropriate evaluation, and specified and prioritized appropriate corrective actions. The inspectors evaluated the report against the requirements of the licensee's CAP as delineated in corporate procedure CAP-NGGC-0200, Condition Identification and Screening Process, and 10 CFR Part 50, Appendix B.

b. Findings

No findings were identified.

4OA3 Follow-up of Events

(Closed) LER 05000400/2013-004-0 and LER 05000400/2013-004-01; Operation Prohibited by Technical Specification Due to Exceeding Hydrogen and Oxygen Concentrations in the Waste Gas System

On November 8, 2013, during shutdown plant operations, the licensee identified oxygen concentrations in the Gaseous Radwaste Treatment system of greater than two percent oxygen, hydrogen greater than four percent and did not take the actions of TS LCO 3.11.2.5. This issue is discussed in more detail with an associated finding in NRC Integrated Inspection Report 05000400/2014002, Section 40A2. This LER is closed.

4OA6 Management Meetings

.1 <u>Exit Meeting Summary</u>

On July 21, 2014, the inspector presented the inspection results to Mr. E. Kapopoulos, and other members of the licensee staff. The inspectors confirmed that proprietary information was not provided or examined during the inspection period.

On April 10, 2014, the lead Emergency Preparedness inspector presented the inspection results to Mr. Kapopoulos, and other members of the licensee staff. The inspectors confirmed that proprietary information was not provided or reviewed during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

- M. Austin, Emergency Preparedness Corporate Functional Area Manager
- D. Corlett, Supervisor, Licensing/Regulatory Programs
- J. Dufner, Plant Manager
- D. Griffith, Training Manager
- R. Howard, Senior Mechanic
- L. Hughes, Superintendent, Environmental and Chemistry
- E. Kapopoulos, Vice President Harris Plant
- C. Kidd, Manager, Nuclear Oversight
- T. McDowell, EP Specialist
- S. O'Connor, Director, Engineering
- M. Parker, Superintendent, Radiation Control
- G. Simmons, EP Supervisor
- T. Slake, Manager, Security
- M. Wallace, Senior Licensing Specialist
- J. Warner, Manager, Outage and Scheduling
- J. White, EP Specialist
- F. Womack, Manager, Operations

NRC Personnel

G. Hopper, Chief, Reactor Projects Branch 4, Division of Reactor Projects, Region II

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

Failure to Adequately Implement a Plant Modification 05000400/2014003-01 FIN (Section 1R18)

Closed

05000400/2013-004-00 and LER Operation Prohibited by Technical Specification Due to Exceeding Hydrogen and Oxygen Concentrations in 05000400/2013-004-01

the Waste Gas System (Section 4OA3)

LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

Procedures

ORT-1415, Electric Unit Heater Check Monthly Interval

OP-161.01, Operations Freeze Protection and Temperature Maintenance Systems

AP-300, Severe Weather

AP-301, Seasonal Weather Preparations and Monitoring

AOP-028, Grid Instability

NGGM-IA-0003, Transmission Interface Agreement

UFSAR 8.2, Offsite Power System

UFSAR 8.3, Onsite Power System

Work Orders

WO #2028834, String 230kV "A" SUT Overhead Lines WO #13360167, "B" SUT, HYDRAN Reading Low

Section 1R04: Equipment Alignment

Partial System Walkdown

Emergency Diesel Generator system:

Procedure OP-155 Emergency Diesel Generator,

UFSAR 9.5.6, Diesel Generator Air Starting System

UFSAR 9.5.5, Diesel Generator Cooling Water System

Auxiliary Feedwater system:

Procedure OP-137, Auxiliary Feedwater System,

Drawing 2165-S-0544, Simplified Flow Diagram Auxiliary Feedwater Systems

UFSAR 10.4.9, Auxiliary Feedwater

Section 1R05: Fire Protection

FPP-001 Fire Protection Program Manual

FIR-NGGC-0009, NFPA 805 Transient Combustibles And Ignition Source Controls Program

Fire Drill Scenario: Waste Processing Building 236' Tool Room Fire

FPP-013, Fire Protection – Minimum Requirements, Mitigating Actions and Surveillance Requirements

FPP-012-02-RAB261, Reactor Auxiliary Building Elevation 261 Fire Pre-Plan

FPP-012-02-RAB 236, Reactor Auxiliary Building Elevation 236 Fire Pre-Plan

FPP-012-02-190-216, Reactor Auxiliary Building Elevations 190 and 216 Fire Pre-Plan

Section 1R11: Licensed Operator Requalification Program

Benchmark Tests

SST-001, "Steady State Accuracy and Stability Test", Performed 11/16/09, 12/15/10

SST-002, "Steady State Accuracy and Stability Test", Performed 11/16/09, 12/15/10

SST-003, "Steady State Accuracy Test", Performed 11/16/09, 12/15/10

TT-001, "Reactor Trip", Performed 10/10

Job Performance Measure (JPM) Packages

Transfer Control to the ACP

Reset Turbine Driven Aux Feedwater Pump

Isolate Ruptured SG – MSIV Will Not Close

Place Containment Cooling in the Maximum Cooling Mode

Classify an Event - ALERT

General Documentation Reviewed

Biennial written examination for 2010 – weeks 1 through 5

Calculation E-5525, Safe Shutdown in Case of Fire

Remedial Action Plan – 2009 – 2010

Requal attendance records 2009-2010

EOP-User's Guide, Part 4, Rev 29

LERs 2009 to 2010

<u>Procedures</u>

OSP-NGGC-1000, Fleet Conduct of Operations, Revision 3

Operations Management Manual, OMM-001, Operations Administrative Requirements, Rev 92

Training Administrative Procedure (TAP) -403, Examination and Testing, Rev 19

TAP 410, NRC License Examination Security Program, Rev 15

TAP-412, Simulator Operations, Maintenance and Testing, Rev 8

Training Program Procedure (TPP)-206 Training Program Procedure-Simulator Rev 10

TPP- 306, Licensed Operator Continuing Training Program, Revision 20

TRN-NGGC-0002, Performance Review and Remedial Training, Rev 0

TRN-NGGC-0420, Conduct of Simulator Training and Evaluation, Rev 0,

TRN-NGGC-0440. Rev 0

TRN-NGGC-1000, Conduct of Training, Rev 3

AOP- 004, Remote Shutdown

HNP-E/ELEC-0001 Appendix 1 Compliance Assessment by Scenario

TRN-NGGC-1000, Conduct of Training, Rev 3

Section 1R12: Maintenance Effectiveness

NUMARC 93-01, Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants

ADM-NGGC-0101, Maintenance Rule Program

Section 1R13: Maintenance Risk Assessments and Emergent Work Evaluation

OMP-003, Outage Shutdown Risk Management

OMM-001, Conduct of Operations

WCP-NGGC-1000, Conduct of On-Line Work Management

OPS-NGGC-1311, Protected Equipment

WCM-001, On-line Maintenance

ADM-NGGC-0006, Online Equipment Out-of-Service (EOOS) Models for Risk Assessment

Section 1R15: Operability Evaluations

OPS-NGGC-1305, Operability Determinations

Section 1EP2: Alert and Notification System Evaluation

Procedures and Reports

EPM-400, Public Notification and Alerting System, Rev. 16 EPM-500, Public Education and Information Program, Rev. 1 HNP Siren System Design Report (full), dated 12/8/12

Records and Data

2013 Tone Alert Weather Radio Survey, dated 11/22/13
EPZ Newsletters, Harris View, Summer-Fall 2013
2011 Tone Alert Radio Brochure
Harris Nuclear Plant Safety Information, Public Mailer for 2013
Student Brochure, Student Safety Information, School Years 2013-2014

Corrective Action Documents

CR 620812; ANS Key Performance Indicator Yellow CR 655542; Siren W-05 shot

<u>Section 1EP3: Emergency Preparedness Organization Staffing and Augmentation</u> System

Procedures

EMG-NGGC-1000, Fleet Conduct of Emergency Preparedness, Rev. 6

EPL-001, Emergency Phone List, Harris Plant, Rev. 86

EPM-200, ERO Training Program, Rev. 17

EPM-201, EP Staff Training Program, Rev. 7

PEP-230, Control Room Operations, Rev. 23

PEP-240, Activation and Operation of the Technical Support Center, Rev. 17

PEP-260, Activation and Operation of the Operations Support Center, Rev. 13

PEP-270, Activation and Operation of the Emergency Offsite Facility, Rev. 28

PEP-310, Notifications and Communications, Rev. 30

PEP-330, Radiological Consequences, Rev. 12

PEP-350, Protective Actions, Rev. 9

Records and Data

Selected Qualification Records for Key Position ERO Personnel 2013 ERO Augmentation Testing Results

Corrective Action Documents

CR 591530; On-duty minimum ERO staff call-in drill failure

CR 621519; ERO member did not have access to ERF for Alert on 8/8/13

CR 601470; ERO key position drill participation credit

CR 652534; Incorrect procedure revisions in ERO position books

Section 1EP4: Emergency Action Level and Emergency Plan Changes

<u>Procedures</u>

EMG-NGGC-0010, Emergency Plan Change Screening and Evaluation 10CFR50.54(q), Rev. 4 REG-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews, Rev. 21 PLP-201, Emergency Plan, Revision 61

Change Packages

EP-EAL, Emergency Action Levels (EALs), Revision 12

PEP-270, Activation and Operation of the Emergency Operations Facility, Rev. 29

PEP-500, Recovery, Rev. 14

Corrective Action Documents

CR 663324; 1D2 Transformer Failure Root Cause Evaluation

CR 664102; EAL wording deviates from SER

<u>Section 1EP5: Maintenance of Emergency Preparedness</u>

Procedures

AD-EP-ALL-0001, Emergency Preparedness Key Performance Indicators, Rev. 0

AD-PI-ALL-0300, Self-Assessment and Benchmarking Programs, Rev. 0

EMG-NGGC-0010, Emergency Plan Change Screening and Evaluation 10CFR50.54(q) Rev. 4

EPM-100, EP Program Administration, Rev. 9

EPM-201, EP Staff Training Program Rev. 7

EPM-410, Communication and Facility Performance Tests, Rev. 11

EPM-420, Emergency Equipment Inventory, Rev. 12

EPM-500, Public Education and Information Program, Rev. 1

Records and Data

Emergency Plan Activation Summary and Critiques, Alert declarations dated August 8, 2013 and January 18, 2014

Drill critiques for 2012 and 2013

H-EP-12-03, Harris Nuclear Plant Emergency Preparedness Assessment, Feb. 1, 2013

H-EP-13-01, Harris NOS Emergency Preparedness Mid-Cycle Review, 12/5/13

Assessment 504587-09, ERO Qualifications, Dec 2011-Jan 2012

Assessment 569001, Preparation for NRC Exercise Inspection, 2/11/13-2/14/13

Assessment 611885, 2012 HNP Strategic Improvement Plan, 6/28/2013

Assessment 631224, 2014 NRC Inspection Preparation, 2/10-20/2014

Corrective Action Documents

551315: Inaccurate PARS

622354; Handling PARS with shifting winds

633855; NOS - 50.54(t) audits lack objective evidence of state/local interface assessment

652716; Toxic Gas EAL threshold guidance

647078; EPIPs not clearly flagged requiring 5054q reviews when changing

663327; TSC rad monitor out-of-service

665969; EOF HVAC system air leak

679255; Seismic switch setpoints possibly greater than OBE

Section 40A1: Performance Indicator Verification

NEI 99-02, Regulatory Assessment Performance Indicator Guideline

Calculation HNP-F/PSA-0068, NRC Mitigating System Performance Index Basis Document for Harris Nuclear Plant

Procedures

AD-EP-ALL-0001, Emergency Preparedness Key Performance Indicators, Rev. 0

AD-EP-ALL-0002, NRC Regulatory Assessment PI Guideline EP Cornerstone, Rev. 0

NRC Regulatory Assessment Performance Indicator Guideline – EP Cornerstone, Rev. 0

PLP-201, Emergency Plan, Rev. 61

PLP-717, Equipment Important to EP and ERO Response, Rev. 11

EP-EAL, Emergency Action Levels (EALs), Revision 12

EPM-210, EP Drill and Exercise Program, Rev. 18

REG-NGGC-0009, NRC Performance Indicators and Monthly Operating Report Data, Rev. 12

CAP-NGGC-0200, Condition Identification and Screening Process, Rev. 38

Records and Data

Documentation of DEP opportunities April 1 to December 31, 2013

Documentation of ANS tests April 1 to December 31, 2013

Documentation of drill and exercise participation for April 1 to December 31, 2013

Various ERO Personnel Qualification and Participation records

Corrective Action Documents

CR 608234; NRC event notification delta

CR 621577; Incorrect information in event notification

CR 621585; SP-015 roster verification for Alert on 8/8/13

Section 4OA2: Identification and Resolution of Problems

CAP-NGGC-0200, Condition Identification and Screening Process

CAP-NGGC-0205, Condition Evaluation and Corrective Action Process

CAP-NGGC-0206, Performance Assessment and Trending