



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

July 23, 2018

EA-18-080

William R. Gideon
Site Vice President
Brunswick Steam Electric Plant
8470 River Rd. SE (M/C BNP001)
Southport, NC 28461

**SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT – NUCLEAR REGULATORY
COMMISSION INTEGRATED INSPECTION REPORT 05000325/2018002 AND
05000324/2018002 AND EXERCISE OF ENFORCEMENT DISCRETION**

Dear Mr. Gideon:

On June 30, 2018, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Brunswick Steam Electric Plant, Units 1 and 2 facilities. On July 19, 2018, the NRC inspectors discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

NRC inspectors documented one finding of very low safety significance (Green) in this report. This finding did not involve a violation of NRC requirements.

A violation of Technical Specification 3.6.4.1, Secondary Containment, was identified. Because the violation was identified during the discretion period described in Enforcement Guidance Memorandum 11-003, Revision 3, the NRC is exercising enforcement discretion in accordance with Section 3.5, "Violations Involving Special Circumstances," of the NRC Enforcement Policy and, therefore, will not issue enforcement action for this violation, subject to the license amendment request submitted on June 29, 2017.

If you disagree with the cross-cutting aspect assignment or the finding not associated with a regulatory requirement 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 U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; and the NRC resident inspector at the Brunswick Steam Electric Plant.

W. Gideon

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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 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Steven D. Rose, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Docket Nos.: 50-325, 50-324
License Nos.: DPR-71, DPR-62

Enclosure:
IR 05000325/2018002 and
05000324/2018002

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SUBJECT: BRUNSWICK STEAM ELECTRIC PLANT – NUCLEAR REGULATORY
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July 23, 2018

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 50-325, 50-324

License Numbers: DPR-71, DPR-62

Report Numbers: 05000325/2018002, 05000324/2018002

Enterprise Identifier: EPID: I-2018-002-0041

Licensee: Duke Energy Progress, LLC

Facility: Brunswick Steam Electric Plant, Units 1 and 2

Location: Southport, NC

Inspection Dates: April 1, 2018 to June 30, 2018

Inspectors: G. Smith, Senior Resident Inspector
J. Steward, Resident Inspector
W. Loo, Senior Health Physicist
J. Panfel, Health Physicist

Approved By: S. Rose, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Enclosure

SUMMARY

The NRC continued monitoring licensee's performance by conducting a quarterly integrated inspection at Brunswick Steam Electric Plant, 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 <http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html> for more information. Any NRC and self-revealed findings, violations, and additional items are summarized in the table below.

List of Findings and Violations

Automatic Reactor Trip due to Perceived Loss of Stator Cooling Water			
Cornerstone	Significance	Cross-cutting Aspect	Report Section
Initiating Events	Green Finding 05000325/2018002-01 Opened/Closed	H.3 - Change Management	71153
A self-revealing Green finding (FIN) was identified for the failure to properly implement a modification to the turbine control system (TCS). The modification ultimately resulted in an automatic reactor trip on April 7, 2018, due to a turbine trip caused by a perceived loss of stator cooling water. The TCS system improperly generated a loss of stator cooling turbine trip when the TCS measured higher than expected stator cooling water flow rates.			

Additional Tracking Items

Type	Issue number	Title	Report Section	Status
LER	05000325/2018-001-00	Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3	71153	Closed
LER	05000325/2018-002-00	Automatic Reactor Trip During Stator Cooling System Realignment	71153	Closed

PLANT STATUS

Unit 1 began the inspection period in mode 4, undergoing a refueling outage, B1R22. On April 2, 2018, the reactor was taken critical. The output breaker was closed on April 3, and power ascension was commenced. On April 7, the unit was automatically tripped from 100 percent rated thermal power (RTP) due to turbine trip (See section 71153). Following repairs to the turbine control system (TCS), the unit was taken critical and synched to the grid on April 9. Maximum achievable power was attained on April 10. Between April 11 and April 18, three separate downpowers were performed for control rod improvements to 76, 88, and 98 percent RTP on April 11, April 13 and April 18, respectively. On April 19, the unit was returned to 100 percent RTP. On May 31, the unit was reduced to 50 percent RTP due to a suspected leak in the 'A' condenser water box. Following repairs to the condenser water box, the unit was returned to maximum achievable power on June 5. Between June 5 and June 9, three separate downpowers were performed for control rod improvements to 62, 82, and 97 percent RTP on June 6, June 8 and June 9, respectively. On June 10, the unit was returned to 100 percent power, where it continued to operate for the remainder of the inspection period.

Unit 2 began the period at 100 percent rated thermal power and operated there until April 17, 2018, when the unit was downpowered to 85 percent RTP in order to effect maintenance on a 230KV line in the switchyard. Following repairs, the unit was returned to 100 percent RTP on April 19, 2018, and essentially operated at this level until June 9, when power was reduced to 62 percent RTP for a control rod sequence exchange. Between June 11 and June 16, two separate downpowers were performed for control rod improvements to 83 and 85 percent RTP on June 13 and June 15, respectively. Following the control rod improvements, power was returned to 100 percent RTP on June 16, where the unit continued to operate until June 22, when the unit was taken offline for a forced outage to effect repairs to a leaking safety relief valve (SRV). Following replacement of the SRV, the reactor was taken critical on June 27. Following synchronizing to the grid on June 28, a power ascension was commenced. At the end of the inspection period, on June 30, the unit reached approximately 82 percent RTP.

INSPECTION SCOPES

Inspections were conducted using the inspection procedure (IP) 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-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met. The inspectors performed plant status activities described in Inspection Manual Chapter (IMC) 2515 Appendix D, "Plant Status," and conducted routine reviews using IP 71152, "Problem Identification and Resolution." The inspectors used the Commission's rules and regulations as the criteria for determining compliance along with established licensee standards as the criteria for assessing licensee performance.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Summer Readiness (1 Sample)

The inspectors completed an evaluation of summer readiness of offsite and alternate alternating current (AC) power systems on June 8, 2018.

Seasonal Extreme Weather (1 Sample)

The inspectors completed an evaluation of readiness for seasonal extreme weather conditions prior to the onset of seasonal hot temperatures on June 22, 2018.

71111.04 - Equipment Alignment

Partial Walkdown (5 Samples)

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

- (1) Unit 2 'A' and 'B' trains of Convention Service Water (CSW) while the unit 2 'C' CSW pump was out-of-service (OOS) for planned maintenance on April 24, 2018.
- (2) 'C' and 'E' Control Building compressors while 'D' was OOS for planned maintenance on May 8, 2018.
- (3) Unit 1 Reactor Core Isolation Cooling (RCIC) system while Unit 1 High Pressure Coolant Injection (HPCI) was OOS for planned maintenance on May 9, 2018.
- (4) Unit 1 'A' Loop Residual Heat Removal (RHR) following alignment from maintenance on June 1, 2018.
- (5) Emergency Diesel Generator (EDG)-1 while EDG-2 was OOS for scheduled maintenance on June 6, 2018.

71111.05AQ - Fire Protection Annual/Quarterly

Quarterly Inspection - 71111.05Q (5 Samples)

The inspectors evaluated fire protection program implementation in the following selected areas:

- (1) Unit 1 Reactor Building 20' elevation on April 13, 2018.
- (2) Unit 1 Reactor Building 50' elevation on April 13, 2018.
- (3) Unit 1 Reactor Building 80' elevation on April 13, 2018.
- (4) Unit 2 Battery Room 2A Control Building 23' elevation on May 8, 2018.
- (5) Unit 2 Cable Spreading Room Control Building 23' elevation on May 8, 2018.

Annual Inspection - 71111.05A (1 Sample)

Fire drill in the Unit 2 Reactor Building health physics office, 20' elevation on April 30, 2018.

71111.06 - Flood Protection Measures

Internal Flooding (1 Sample)

The inspectors completed an evaluation of internal flood mitigation protections in the EDG fuel oil storage vault on June 29, 2018.

Cables (1 Sample)

The inspectors evaluated cable submergence protection by inspecting the below-listed cable vaults:

- (1) Manhole 2-MH-MW2 on April 4, 2018.
- (2) Manhole 2-MH-6NW on May 21, 2018.
- (3) Manhole 2-MH-2SE on May 21, 2018.

71111.11 - Licensed Operator Requalification Program and Licensed Operator Performance

Operator Requalification (1 Sample)

The inspectors observed and evaluated a simulator scenario conducted for requalification training of an operating crew on May 25, 2018.

Operator Performance (1 Samples)

- (1) On May 31, 2018, the inspectors observed and evaluated Unit 1 downpower from 100 to 50 percent power as a result of high conductivity in the hotwell from a suspected main condenser water box leak.
- (2) On June 22, 2018, the inspectors observed and evaluated Unit 2 down power from 100 percent to 18 percent power, commencing forced outage, B2F23A, to repair source of drywell floor drain leakage suspected to be 'E' safety relief valve (SRV) and associated vacuum breaker.

71111.12 - Maintenance Effectiveness

Routine Maintenance Effectiveness (2 Samples)

The inspectors evaluated maintenance activities associated with the following equipment performance issues:

- (1) NCR 2185263 – Forced shutdown due to elevated temperatures on the 'A' phase no load disconnect on June 22, 2018.
- (2) NCR 2191991 – Recirculation seal injection valve failed Local Leak Rate Testing (LLRT) on June 28, 2018.

71111.13 - Maintenance Risk Assessments and Emergent Work Control (5 Samples)

The inspectors evaluated the risk assessments for the following planned and emergent work activities:

- (1) Conventional SW pump 2C outage on April 25, 2018.
- (2) Unit 1 HPCI outage on May 10, 2018.
- (3) Unit 1 'A' train RHR outage on May 31, 2018.
- (4) EDG-2 outage on June 6, 2018.
- (5) Unit 1 'A' Core Spray pump outage on June 27, 2018.

71111.15 - Operability Determinations and Functionality Assessments (5 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

- (1) NCR 2174081 - Inspection of Independent Spent Fuel Storage Installation (ISFSI) on May 1, 2018.
- (2) NCR 2177656 - Two indications on weld 2-E51-246 on May 3, 2018.
- (3) NCR 2178898 - Program logic relay installed in EDGs on May 7, 2018.
- (4) NCR 2190611 - Nozzle weld flaw 1B21N4A on May 11, 2018.
- (5) NCR 2190188 - 1B1 Battery unsatisfactory performance on June 7, 2018.

71111.19 - Post Maintenance Testing (3 Samples)

The inspectors evaluated the following post-maintenance tests:

- (1) OPT-07.2.4A, "Core Spray System Operability Test – Loop A," Revision 83, after repair/replacement of the 1A Core Spray 4160 volt cable.
- (2) OPT-09.2, "HPCI System Operability Test," Revision 151 after planned inspection of valve 1E41-V8, "HPCI trip and throttle valve."
- (3) OPT-09.7, "HPCI Valve Operability Test," Revision 36, after planned maintenance on valve 1-E41-F004, "CST Suction Valve."

71111.20 - Refueling and Other Outage Activities

Refueling Outage (1 sample – counted in 1st quarter)

The inspectors completed an evaluation of the Unit 1 refueling outage B1R22 from April 1, 2018 to April 10, 2018.

Forced Outage (1 sample)

The inspectors evaluated activities associated with a Unit 2 forced outage from June 22, 2018 to June 28, 2018.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests on the dates indicated below:

Routine (2 Samples)

- (1) 1PT-01.7, "Heatup/Cooldown Monitoring," Rev. 10, on April 5, 2018
- (2) 0PT-20.3C, "Personnel Airlock Interior and Exterior Doors Leak Rate Test," Rev. 12, on June 29, 2018

In-service (1 Sample)

- (1) 0PT-08.2.2B, "LPCI/RHR System Operability Test," Rev. 105, on June 27, 2018

71114.06 - Drill Evaluation

Emergency Planning Drill (1 sample)

The inspectors evaluated an emergency planning drill conducted on April 25, 2018. This drill involved an activation of the technical support center and the operational support center.

Drill/Training Evolution (1 sample)

The inspectors evaluated a licensed operator requalification training (simulator) evolution on May 25, 2018. The inspectors noted that this training evolution was predetermined to be included as a drill and exercise performance (DEP) performance indicator (PI) as delineated in NEI 99-02, "Regulatory Assessment Performance Indicator guideline."

RADIATION SAFETY

71124.06 - Radioactive Gaseous and Liquid Effluent Treatment

Walk Downs and Observations (1 Sample)

The inspectors evaluated the licensee's radioactive gaseous and liquid effluent treatment systems during plant walkdowns.

Calibration and Testing Program (Process and Effluent Monitors) (1 Sample)

The inspectors evaluated the licensee's gaseous and liquid effluent monitor instrument calibration and testing.

Sampling and Analyses (1 Sample)

The inspectors evaluated radioactive effluent sampling and analysis activities.

Instrumentation and Equipment (1 Sample)

The inspectors evaluated radioactive effluent instrumentation and equipment.

Dose Calculations (1 Sample)

The inspectors evaluated dose calculations.

71124.07 - Radiological Environmental Monitoring ProgramSite Inspection (1 Sample)

The inspectors evaluated the licensee's radiological environmental monitoring program.

Groundwater Protection Initiative Implementation (1 Sample)

The inspectors evaluated the licensee's groundwater monitoring program.

OTHER ACTIVITIES – BASELINE71151 - Performance Indicator Verification

On June 29, 2018, the inspectors verified licensee performance indicators submittals listed below for the period from April 1, 2017, through March 30, 2018. (8 Samples)

- (1) Unit 1 Safety System Functional Failures (SSFF)
- (2) Unit 2 SSFF
- (3) Unit 1 Emergency AC Power
- (4) Unit 2 Emergency AC Power
- (5) Unit 1 Cooling Water Support Systems
- (6) Unit 2 Cooling Water Support Systems
- (7) OR01: Occupational Exposure Control Effectiveness (1 Sample)
- (8) PR01: Radiological Effluent Technical Specifications/Offsite Dose Calculation
Manual Radiological Effluent Occurrences (RETS/ODCM) Radiological Effluent
Occurrences (1 Sample)

71152 - Problem Identification and ResolutionSemiannual Trend Review (1 Sample)

On June 29, 2018, the inspectors completed a review of the licensee's corrective action program for trends that might be indicative of a more significant safety issue.

Annual Follow-up of Selected Issues (1 Sample)

On June 22, 2018, the inspectors completed a review the licensee's implementation of its corrective action program related to the following issue:

- (1) NCR 2172700 – Unit 2 HPCI steam supply packing failure.

71153 - Follow-up of Events and Notices of Enforcement DiscretionLicensee Event Reports (2 Samples)

The inspectors evaluated the following licensee event reports which can be accessed at <https://lersearch.inl.gov/LERSearchCriteria.aspx>:

1. Licensee Event Report (LER) 1-2018-001, "Implementation of Enforcement Guidance Memorandum (EGM) 11-003," issued on May 7, 2018.
2. LER 1-2018-002, "Automatic Reactor Trip during Stator Coolant System Realignment," issued on June 5, 2018.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

60855.1 - Operation of an Independent Spent Fuel Storage Installation

The inspectors evaluated the licensee’s independent spent fuel storage installation cask loadings on June 22, 2018.

INSPECTION RESULTS

Observation	71152
<u>Annual Follow-up of Selected Issues: Packing leak from HPCI Steam Supply Valve</u>	
<p>The inspectors conducted a detailed review of NCR 2172700, "Unit 2 HPCI steam supply packing failure." The inspectors selected this issue due to the potential of the leak to affect the safety function of the HPCI system.</p>	

Observation	71152
<u>Semi Annual Trend Review:</u>	
<p>The inspectors performed a trend analysis on the licensee’s corrective action program in order to identify trends that could indicate the existence of a more significant safety issue. The inspectors focused their review on human performance trends, but also considered the results of inspector daily condition report screenings, licensee trending efforts, and licensee human performance results. The review nominally considered the 6-month period of January 2018 through June 2018, although some examples extended beyond those dates when the scope of the trend warranted. The inspectors compared their results with the licensee’s analysis of trends. Additionally, the inspectors reviewed the adequacy of corrective actions associated with a sample of the issues identified in the licensee’s trend reports. The inspectors also reviewed corrective action documents that were processed by the licensee to identify potential adverse trends in the condition of structures, systems, and/or components as evidenced by acceptance of long-standing non-conforming or degraded conditions.</p> <p>The inspectors noted a negative human performance trend for the last six months where the licensee was challenged by foreign material exclusion (FME) events were caused by human performance errors. The examples below exhibited gaps in licensee performance with respect to adequately preventing FME from interacting with safety related equipment or equipment covered under the maintenance rule. The inspectors discussed this negative trend with the licensee and the weaknesses were acknowledged by the licensee.</p>	

- CR 2176522 Reactor Fuel pin leak due to suspected FME
- CR 2210382 - FME Found in Unit 1 'A' North Inlet Water box
- CR 2190479 - Legacy FME found near Jet Pump #14
- CR 2216279 - FME in Unit 1 MLO sump
- CR 2135419 - FME found in Station Battery
- CR 2192000 - QC Identified FME inside 1-SW-V22 Inspection
- CR 2194049 - Legacy FME discovered in Unit 1 Main Turbine Drain Line
- CR 2138273 – Floor Drains Clogged -17' Reactor Building

The inspectors discussed this observation with the licensee.

Automatic Reactor Trip due to Perceived Loss of Stator Cooling Water

Cornerstone	Significance	Cross-cutting Aspect	Report Section
Initiating Events	Green FIN 05000325/2018002-01 Opened/Closed	H.3 – Change Management	71153

Introduction: A self-revealing Green finding was identified for the licensee’s failure to properly implement plant modification EC 287401, which installed the turbine control system (TCS) on Unit 1 during the spring 2018 refueling outage (B1R22). The modification error resulted in an automatic reactor trip on April 7, 2018, during routine testing of the stator cooling water system. The licensee failed to meet their own modification standard by adequately testing the modification.

Description: On April 7, 2018, at 0832, the licensee began routine testing of the stator cooling water system using procedure OPT-36.1, “Stator Cooling System.” As part of the procedure, the operators are required to start a second stator cooling pump. Upon start of the second pump, several annunciators were received which appeared to indicate to the operators that no stator cooling water was available. There also appeared to be no anomalous temperature indications associated with the main generator stator. Operators began to troubleshoot the indications and noted that there was more than adequate cooling water flow indicated. After approximately two minutes, an automatic turbine trip was automatically initiated by the TCS and followed by the expected automatic reactor trip. The operators quickly stabilized the plant in Mode 3.

Subsequent troubleshooting revealed that the recently installed TCS had replaced the analog turbine trip logic for low stator water flow with a digital version. The digital version included a special feature that would address failed instruments. If any instrument were to fail high or low, then the TCS would throw out the failed instrument input to the trip logic and only consider the remaining two. However, if all three were to fail then the TCS would generate an automatic turbine trip. When the second stator cooling water pump was started, the resultant flow was approximately 612 gallons per minute (gpm). The system considered this value as beyond the range of the instrument, which was set at 600 gpm. This out of range flow was sensed on all three channels. The TCS system was programmed to “throw out” all three values and generated the turbine trip signal. The licensee failed to account for this situation and an unnecessary turbine/reactor trip was initiated.

Corrective Actions: The licensee modified the software to remove the automatic bypass feature associated with a failed high stator cooling water flow instrument.

Corrective Action Reference: NCR 2196899

Performance Assessment:

Performance Deficiency: The licensee's failure to account for valid flows above 600 gpm, in this plant modification which would be encountered during routine surveillances, was a performance deficiency (PD). This design control PD resulted in a condition that upset plant stability to cause an unnecessary turbine/reactor trip. The performance standard not met was licensee's modification program as described in PD-EG-ALL-1130, "Engineering Change Program," Rev. 0. Specifically, the licensee did not implement the testing phase of the TCS modification in a manner that would have precluded a reactor trip.

Screening: Since the plant modification indirectly resulted in a reactor trip transient, the inspectors determined the performance deficiency was more than minor because it adversely affected the "design control" attribute of the initiating events cornerstone and its objective to limit events that upset plant stability during power operation.

Significance: The inspectors assessed the significance of the finding using Manual Chapter 0609, "Significance Determination Process (SDP)," Attachment 0609.04, "Initial Characterization of Findings," and Appendix 'A', "The SDP process for Findings At-Power." Specifically, using Attachment 0609.04, the finding was determined to adversely affect the Initiating Events cornerstone since the finding was related to an automatic reactor trip and thus was a transient initiator contributor. Using Table 3 of Attachment 0609.04, the finding was required to be further evaluated using Appendix A since the finding was related to initiating events and was not related to shutdown operations, licensed operator requalification, maintenance rule risk assessments, fire protection, etc. Using Appendix 'A' (Exhibit 1), the finding was determined to be of very low safety significance (Green) since the finding was not related to a Loss Of Coolant Accident (LOCA), support system, steam generator tube rupture, or external events initiators. Although the finding did cause a reactor trip, it did not cause or result in the loss of mitigation equipment relied upon to place the plant in a stable shutdown condition.

Cross-cutting Aspect: This finding has a cross-cutting aspect in the change management component of human performance (H.3) since the organization did not fully evaluate the effects of converting the stator cooling water trip function from an analog logic to a digital logic. Specifically, the licensee did not evaluate the potential effects that running two stator cooling water pumps would have on the system when implementing the plant modification.

Enforcement: Inspectors did not identify a violation of regulatory requirements associated with this finding.

Enforcement Discretion	Enforcement Action 18-080: Implementation of EGM 11-003, Revision 3, Enforcement Guidance Memorandum on Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel (OPDRV)	71153
<p><u>Description:</u> During the Unit 1 spring 2018 refueling outage, the OPDRVs activities are listed below:</p> <ul style="list-style-type: none"> • March 7, 2018: 148 gallons per minute (gpm) leakage associated with local leak rate testing (LLRT) of valves 1-G31-F001 and -F004. • March 8, 2018: 82 gpm leakage for 'A' RHR loop draining to support maintenance. • March 12, 2018: 81.2 gpm leakage to replace the local power range monitors and intermediate power range dry tubes. • March 14, 2018: 71.2 gpm leakage to replace the local power range monitors. • March 15, 2018: 25 gpm leakage to replace 'A' recirculation pump seal package. • March 22, 2018: 25 gpm leakage to replace 'A' recirculation pump seal package. • March 27, 2018: 164 gpm leakage to facilitate control rod drive system venting. • March 28, 2018: 288 gpm leakage to account for leakage past scram discharge and vent valves during testing. <p>These activities took place without secondary containment being operable.</p> <p>Corrective Actions: EGM 11-003 allows enforcement discretion regarding secondary containment operability during Mode 5 OPDRV activities provided the licensee meets certain requirements. The licensee met the stipulations of the EGM by executing their procedure 1SP-16-100, "EGM 11-003 OPDRV Activities," Rev 001, for each OPDRV activity during the Unit 1 Spring 2018 refueling outage. Additionally, as required by the EGM, the licensee submitted a license amendment request (BSEP 17-0060) on June 29, 2017. The amendment was approved on April 13, 2018, and will be implemented prior to the 2019 Unit 2 spring refueling outage.</p> <p>Corrective Action Reference: The issue was entered into the licensee's corrective action program as NCR 2189536.</p> <p>Violation: TS 3.6.4.1, Secondary Containment, requires that secondary containment be operable and is applicable during OPDRVs. The required action if secondary containment is inoperable in this condition is to initiate actions to suspend OPDRVs immediately. Contrary to the above, on activities listed above, the licensee failed to maintain secondary containment operable while performing OPDRVs on Unit 1.</p> <p>Severity/Significance: According to EGM 11-003, the NRC considers enforcement discretion related to secondary containment operability during Mode 5 OPDRV activities provided the licensee meets certain requirements such as monitoring vessel level, maintaining capability to isolate leakage paths, providing minimum makeup flow rate, etc. These requirements provide a reasonable assurance of public health and safety during draining activities in Mode 5 while the secondary containment is inoperable.</p>		

Discretion Basis: The NRC exercised enforcement discretion in accordance with Section 3.5, "Violations Involving Special Circumstances," of the NRC Enforcement Policy and, therefore, will not issue enforcement action for this violation. These violations were identified during the discretion period described in EGM 11-003, Revision 3, and the licensee met the criteria established in the EGM prior to and during these activities.

EXIT MEETINGS AND DEBRIEFS

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

- On July 19, 2018, the inspectors presented the quarterly resident inspector inspection results to Mr. Randy Gideon and other members of the licensee staff.

DOCUMENTS REVIEWED

Common Documents Reviewed

Updated Final Safety Analysis Report
 Individual Plant Examination
 Individual Plant Examination of External Events
 Technical Specifications and Bases
 Technical Requirements Manual
 Control Room Narrative Logs
 Plan of the Day
 Daily EOOS Risk Profile

71111.01: Adverse Weather Protection

Procedures

0AP-025, BNP Integrated Scheduling, Rev. 56
 0OI-01.03, Non-Routine Activities, Rev. 70
 0AP-062, Seasonal Preparations, Rev. 6
 SD-50, 230 KV Electric Distribution System, Rev. 23
 AD-EG-ALL-2000, Controlling Procedure for Nuclear Switchyard Interface, Rev. 0
 1OP-44, Turbine Building Closed Cooling Water System Operating Procedure, Rev.49
 1OP-21, Reactor Building Closed Cooling Water System Operating Procedure, Rev.78
 2OP-43, Service Water System Operating Procedure, Rev. 167
 AD-WC-ALL-0230, Seasonal Readiness, Rev. 0

Work Orders

20130497-01
 20159966-02
 20180091-01

71111.04: Equipment Alignment

Procedures

0OP-37, Control Bldg Ventilation System Operating Procedure, Rev. 64
 Updated Final Safety Analysis Report, Section 9.4.1, Control Bldg Ventilation System, Rev. 25
 SD-37, Control Bldg Heating, Ventilation and Air Conditioning System, Rev. 16
 1OP-17, RHR System Operating Procedure, Rev. 132
 Updated Final Safety Analysis Report, Section 5.4.7, Residual Heat Removal System, Rev. 25
 SD-17, Residual Heat Removal System, Rev. 19
 0OP-39, Diesel Generator Operating Procedure, Rev. 190
 Updated Final Safety Analysis Report, Section 8.3.1.1.6, Standby Alternating Current Power
 Supply and Distribution, Rev. 25
 2PFP-CB-06 Attachment 4 of CSD-BNP-PFP-0CB, Rev. 1
 2PFP-CB-09 Attachment 7 of CSD-BNP-PFP-0CB, Rev. 1

Drawings

F-04080, sheet 001, U1 and U2 Control Bldg Air Flow Diagram, Rev. 17
 F-04080, sheet 002, U1 and U2 Control Bldg Air Flow Diagram, Rev. 5
 F-04081, Control Bldg Air Conditioning and Ventilation Plan, Elevation 23' and 49', Rev. 23
 F-04082, Control Bldg Air Conditioning and Ventilation Mechanical Room, Elevation 70' Plan
 and Sections, Rev. 30.
 D-25025, sheet 1A, RB RHR System Piping Diagram, Rev. 58

D-25025, sheet 1B, RB RHR System Piping Diagram, Rev. 74
 D-02270, sheet 1A, Diesel Generator Lube Oil System Piping Diagram, Rev. 24
 D-02265, sheet 1A, Starting Air for Diesel Generators Piping Diagram, Rev. 29
 D-02272, sheet 1A, Diesel Generator Jacket Water System Piping Diagram, Rev. 15
 D-02268, sheet 1A, Fuel Oil Diesel Generators Piping Diagram Unit 1 & 2, Rev. 31
 D-02267, sheet 1, Diesel Generator Air Intake Exhaust & Crankcase Vacuum System Piping Diagram, Rev. 13

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