Inspection Procedure (IP): 71111.13,"Maintenance Risk Assessments and Emergent Work Control"
Inspector Procedure Lead: Ami Agrawal
Estimated Hours to Complete Review: 4 hours
Date Review Completed: August, 2018

1. Results and assessment of review of IMC 0308, ROP basis document review

IP 71111.13 was last issued on December 20, 2017. Review complete, no issues noted.

Verbiage in the bases section of the IP will be removed and a reference to IMC 0308 will be incorporated.

2. Results and assessment of review of any applicable changes to PIs

A three year review by the PI lead did not identify any significant changes to PIs that would result in a reduction or unintended gap in the key safety attributes of each safety cornerstone.

3. Results and assessment of review of any applicable changes to Rules and STSs

Revisions to rules and Standard Technical Specifications within the last three years did not indicate a need for revision.

4. Results and assessment of review of recent Operating Experience

Operating Experience Note 2017-8: A high energy arc flash occurred at Turkey Point on March 18, 2018 was caused by residual mesh lagging material debris from the installation of Thermo-Lag insulation on the cable trays. The mesh, a light-weight, carbon-fiber material, is conductive and came in contact with the reactor coil, an inductor-type protection device between the high and low voltage sides of the switchgear. The pressure wave from the explosion also damaged the fire door that forms part of the credited fire barrier. The design requirements for the fire door between the two switchgear rooms and determined that it met fire protection requirements as a fire barrier, and is not required to be blast resistant.

A Feedback Form may be initiated to reference these Operating Experience notes.

5. Results and assessment of review based on RRPS data (see separate IP 71111.13 Assessment Data file for details of RRPS data)

Adverse trends or outliers noted: No

<u>Assessment:</u>

- From 2015 through 2017, the total number of Findings decreased by 18.6 percent (page 1 of 10 of IP 28). Since IP inception, the trend line depicts a slight decrease in Findings per year. This is consistent with 2013, the trend line shows a modest decrease in Findings per year.
- For "3 Year Findings/1000 hrs", Region 4 had the most at 5.7 and Region 2 had the least at 2.5 (page 3 of 10 of IP 28).
- From 2015 to 2017, the average hours per sample among the four regions is 4.6, where Region 4 had the highest at 5.3 and Region 1 had the lowest at 4.1. The Budgeted

range for IP 71111.13 is 80 to 100 hours and 14-24 samples per year/per site. Average hour/sample/site is 4.96. It appears that the actual hours charged are within the budgeted amount and no adjustments are required.

6. Feedback Forms

FBFs Closed Last three years

There were three Feedback Forms closed in the last three years:

- Approved FBF 71111.13-1951 (ML16033A375) recommended the IP be revised to reflect the current guidance in NUMARC 93-01, "Industry Guide for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants,"
- Denied FBF 71111.13-2135 (ML16033A384) recommended the IP be revised to conform with risk-informed STS 3.0.8 to evaluate risk for snubbers.
- Approved FBF 71111.13-2261 (ML17205A261) recommended the IP be revised to include inspection objectives and requirements relating to oversight of licensing implementation of risk management technical specifications, specifically risk-informed completion times.

Open FBFs

Currently, there is one open Feedback Form.

- 71111.13-2326: recommends eliminating vertical slice inspections

7. Other Considerations

None

8. Results of discussions with regions

On Monday October 1st, the results of the assessment were discussed with the regions, no changes to the inspection procedure was recommended.

Recommendations

No recommendations