UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

May 13, 2019

Mr. Mano Nazar
President and Chief Nuclear Officer,
Nuclear Division
NextEra Energy Seabrook, LLC
Mail Stop: EX/JB
700 Universe Blvd.
Juno Beach, FL 33408

SUBJECT: SEABROOK STATION, UNIT NO. 1 - INTEGRATED INSPECTION REPORT 05000443/2019001

Dear Mr. Nazar:

On March 31, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Seabrook Unit 1. On April 18, 2019 the NRC inspectors discussed the results of this inspection with Mr. Eric McCartney, Site Vice President and other members of your staff. The results of this inspection are documented in the enclosed report.

NRC inspectors documented two self-revealing Severity Level IV violations with no associated finding. The NRC is treating these violations as a non-cited violations (NCVs) consistent with Section 2.3.2.a of the Enforcement Policy.

If you contest the violations or significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement; and the NRC resident inspector at Seabrook.

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/

Brice A. Bickett, Chief
Reactor Projects Branch 3
Division of Reactor Projects

Docket No.: 50-443
License No.: NPF-86

Enclosure:
Inspection Report 05000443/2019001

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SUBJECT: SEABROOK STATION, UNIT NO. 1 – INTEGRATED INSPECTION REPORT 05000443/2019001 DATED MAY 13, 2019

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	05000443
License Number:	NPF-86
Report Number:	05000443/2019001
Enterprise Identifier:	I-2019-001-0041
Licensee:	NextEra Energy Seabrook, LLC (NextEra)
Facility:	Seabrook Station, Unit No. 1 (Seabrook)
Location:	Seabrook, NH
Inspection Dates:	January 1, 2019, to March 31, 2019
Inspectors:	P. Cataldo, Senior Resident Inspector E. Allen, Resident Inspector J. Furia, Senior Health Physicist
Approved By:	Brice A. Bickett, Chief Reactor Projects Branch 3 Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring NextEra's performance at Seabrook by conducting the baseline inspections described in this report 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 https://www.nrc.gov/reactors/operating/oversight.html for more information. NRC-identified and self-revealing findings, violations, and additional items are summarized in the table below.

List of Findings and Violations

Reactor Coolant Loop 4 Overpower Delta Temperature Instrument Setpoint Exceeded Allowable Value Resulting in a Condition Prohibited by Technical Specifications			
Cornerstone	Significance	Cross-cutting Aspect	Report Section
Not Applicable	Severity Level IV NCV 05000443/2019001-01 Open/Closed	Not Applicable	71153
The inspectors identified a self-revealing, Severity Level IV, non-cited violation of Technical Specification 2.2.1, "Reactor Trip System Instrumentation Setpoints," following the likely intermittent failure of a printed circuit card in the Westinghouse 7300 portion of the reactor protection system. This failure resulted in a calculated setpoint value greater than the Technical Specification allowable valve for approximately 38 hours in September 2018.			

Inoperable Charging System Valve Resulting in a Condition Prohibited by Technical Specifications			
Cornerstone	Significance	Cross-cutting Aspect	Report Section
Not Applicable	Severity Level IV NCV 05000443/2019001-02 Open/Closed	Not Applicable	71153
The inspectors identified a self-revealing, Severity Level IV, non-cited violation of Technical Specification 3.5.2, "Emergency Core Cooling Systems," which occurred when two centrifugal charging pump emergency core cooling system subsystems were inoperable. Specifically, the 'B' centrifugal charging pump had been out of service for more than 12 hours for maintenance when it was discovered that the 'A' centrifugal charging pump's minimum flow isolation valve would not automatically close.			

Additional Tracking Items

Type	Issue number	Title	Report Section	Status
LER	05000443/2018-002-00	Automatic Valve in Emergency Core Cooling System Inoperable	71153	Closed
LER	05000443/2018-003-00	Overpower Delta T Setpoint Exceeded Allowable Value for Time Longer than Permitted by the Technical Specifications	71153	Closed

PLANT STATUS

Seabrook Station began the inspection period operating at 100 percent rated thermal power. There were no operational power changes of regulatory significance for the remainder of the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) 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 consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed plant status activities described in IMC 2515 Appendix D, "Plant Status" and conducted routine reviews using IP 71152, "Problem Identification and Resolution." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Impending Severe Weather Sample (IP Section 03.03) (1 Sample)

(1) The inspectors evaluated readiness for impending adverse weather conditions for winter storm preparations on January 19-20

71111.04 - Equipment Alignment

Partial Walkdown (IP Section 03.01) (4 Samples)

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

(1) Service water vacuum breaker monthly exercise on January 7
(2) 'A' residual heat removal testing on January 16
(3) 1D battery replacement on January 31
(4) 'B' service water ocean and cooling tower return-to-service on March 1

71111.05A - Fire Protection (Annual)

Annual Inspection (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated fire brigade performance on February 7

71111.05Q - Fire Protection

Quarterly Inspection (IP Section 03.01) (5 Samples)

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

(1) Circulating water pump room (SW-F-1A-Z) on March 25
(2) 'A' train MCC room (SW-F-1B-A) on March 25
(3) 'B' train MCC room (SW-F-1C-A) on March 25
(4) HVAC room (SW-F-1D-A) on March 25
(5) Service water pump room (SW-F-1E-Z) on March 25

71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 02.02a.) (1 Sample)

The inspectors evaluated internal flooding mitigation protections in the following area:

(1) Turbine building sump in March 2019

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

The inspectors observed and evaluated the following performance activities in the main control room:

(1) 'B' emergency diesel generator fast start on January 28
(2) Turbine control valve testing on February 8
(3) Ocean/cooling tower service water alignment on February 28

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

The inspectors observed and evaluated a licensed operator requalification examination in the simulator on January 28, 2019. This examination involved simulated multiple failures and events, including: loss of a charging pump, turbine building flooding, a reactor trip complicated by safety valve failures on the 'D' steam generator that required demonstration of faulted steam generator emergency operating procedure actions, coupled with recovery from a loss of all electrical power.

71111.12 - Maintenance Effectiveness

Routine Maintenance Effectiveness Inspection (IP Section 02.01) (2 Samples)

The inspectors evaluated the effectiveness of routine maintenance activities associated with the following equipment and/or safety significant functions:

(1) Fire seal maintenance and inspections in January 2019
(2) Recurrent radiation monitoring instrumentation deficiencies on March 26

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (5 Samples)

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

(1) Service water system alignment during transfer from the cooling tower to the ocean on January 17
(2) Safety-related 'D' battery replacement on February 13
(3) Service water alignment and switchyard maintenance on March 8
(4) 'A' emergency diesel generator surveillance and switchyard maintenance on March 11
(5) Switchyard activities including breaker 294 and emergency feedwater pump testing on March 20

71111.15 - Operability Determinations and Functionality Assessments

Sample Selection (IP Section 02.02) (4 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

(1) Corrosion of service water temperature element flange bolts on January 29
(2) 'B' emergency diesel generator cumulative oil leaks in March 2019
(3) Corrosion evaluation for emergency diesel generator fuel oil transfer piping in March 2019
(4) 'B' service water pressure transmitter corrosion on March 22

71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following permanent modification:

(1) Service water discharge flow transmitter replacement (EC 292323) on March 1

71111.19 - Post Maintenance Testing

Post Maintenance Test Sample (IP Section 03.01) (6 Samples)

The inspectors evaluated the following post maintenance tests:

(1) 'B' main steam radiation monitor replacement on January 2
(2) Battery charger 2P relay replacement on January 9
(3) Fire pump 20B annual maintenance on January 14
(4) 'B' emergency diesel generator air start compressor swap out on February 1
(5) Enclosure air handling fan 5A maintenance on February 19
(6) Primary component cooling water flange fastener corrosion repair on March 4

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

In Service Testing (IST) (IP Section 03.01) (1 Sample)

(1) Turbine-driven emergency feedwater pump and associated main steam valve timing tests on March 20

Surveillance Testing (IP Section 03.01) (4 Samples)

(1) 'A' atmospheric steam dump valve operability test on January 4
(2) 'C' steam generator FW-P-535 channel calibration on January 24
(3) Quarterly control rod operability surveillance on February 1
(4) Reactor coolant system sampling activities on March 5

71114.06 - Drill Evaluation

Drill and/or Simulator-Based Licensed Operator Requalification Training (IP Section 02.01) (1 Sample)

The inspectors evaluated the emergency planning aspects of a licensed operator annual simulator evaluation conducted in the Unit 1 plant-reference simulator on January 28. This evaluation included the initiation conditions and reporting requirements that resulted in associated emergency classification and notifications in accordance with prescribed procedures of the NextEra emergency plan.

Emergency Preparedness (EP) Drill (IP Section 02.01) (1 Sample)

The inspectors evaluated the conduct of a routine, full participation emergency planning drill No. 19-01 on March 13.

RADIATION SAFETY

71124.06 - Radioactive Gaseous and Liquid Effluent Treatment

Calibration and Testing Program (Process & Effluent Monitors) (IP Section 02.02) (1 Sample)

The inspectors reviewed gaseous and liquid effluent monitor instrument calibration, functional test results, and alarm set-points based on National Institute of Standards and Technology calibration traceability and offsite dose calculation manual specifications.

Dose Calculations (IP Section 02.05) (1 Sample)

The inspectors reviewed changes in reported dose values from the previous annual radioactive effluent release reports, several liquid and gaseous radioactive waste discharge permits, the scaling method for hard-to-detect radionuclides, offsite dose calculation manual changes, land use census changes, public dose calculations (monthly, quarterly, annual), and records of abnormal gaseous or liquid radioactive releases.

Instrumentation and Equipment (IP Section 02.04) (1 Sample)

The inspectors reviewed the methodology used to determine the radioactive effluent stack and vent flow rates to verify that the flow rates were consistent with Technical Specifications, Offsite Dose Calculation Manual and Updated Final Safety Analysis Report values. The inspectors reviewed radioactive effluent discharge system surveillance test results based on technical specification acceptance criteria.

Sampling and Analysis (IP Section 02.03) (1 Sample)

The inspectors reviewed radioactive effluent sampling activities, representative sampling requirements, compensatory measures taken during effluent discharges with inoperable effluent radiation monitoring instrumentation, the use of compensatory radioactive effluent sampling, and the results of the inter-laboratory and intra-laboratory comparison program including scaling of hard-to-detect isotopes.

Walk Downs and Observations (IP Section 02.01) (1 Sample)

The inspectors walked down the gaseous and liquid radioactive effluent monitoring and filtered ventilation systems to assess the material condition and verify proper alignment according to plant design.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

IE01: Unplanned Scrams per 7000 Critical Hours (IP Section 02.01) (1 Sample)

For the period January 1, 2018, through December 31, 2018

IE03: Unplanned Power Changes per 7000 Critical Hours (IP Section 02.02) (1 Sample)

For the period January 1, 2018, through December 31, 2018

IE04: Unplanned Scrams with Complications (IP Section 02.03) (1 Sample)

For the period January 1, 2018, through December 31, 2018

71153 – Follow-up of Events and Notices of Enforcement Discretion

Event Report (IP Section 03.02) (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 05000443/2018-002-00, Automatic Valve in Emergency Core Cooling System Inoperable (ADAMS accession: ML18262A408). The circumstances surrounding this licensee event report are documented in the Inspection Results section of the report.

(2) Licensee Event Report 05000443/2018-003-00, Overpower Delta T Setpoint Exceeded Allowable Value for Time Longer than Permitted by the Technical Specifications (ADAMS accession: ML18330A208). The circumstances surrounding this licensee event report are documented in the Inspection Results section of the report.

INSPECTION RESULTS

Reactor Coolant Loop 4 Overpower Delta Temperature Instrument Setpoint Exceeded Allowable Value Resulting in a Condition Prohibited by Technical Specifications			
Cornerstone	Severity	Cross-cutting Aspect	Report Section
Not Applicable	Severity Level IV NCV 05000443/2019001-01 Open/Closed	Not Applicable	71153

The inspectors identified a self-revealing, Severity Level IV, non-cited violation of Technical Specification 2.2.1, “Reactor Trip System Instrumentation Setpoints,” following the likely intermittent failure of a printed circuit card in the Westinghouse 7300 portion of the reactor protection system. This failure resulted in a calculated setpoint value greater than the Technical Specification allowable valve for approximately 38 hours in September 2018.

Description: During a parameter trend review on September 27, 2018, control room operators discovered elevated readings associated with the loop 4 overpower delta temperature instrument setpoint values for approximately 38 hours between September 25 and September 26. Troubleshooting activities narrowed the cause of the elevated setpoint value to four printed circuit boards within the Westinghouse 7300 portion of the reactor protection system. The licensee reported this to the NRC via Licensee Event Report 2018-003-0 on November 26, 2018, in accordance with 10 CFR 50.73 requirements.

Inspectors reviewed the printed circuit board failure history for the types associated with the setpoint vales, which included internal Seabrook Station histories, as well as applicable industry failure rates for those circuit board types installed at several nuclear plants currently in operation. The inspectors did not identify any trend of circuit board failures for the types attributable to the setpoint exceedance that would be indicative of a performance-based trend that would have been reasonably within the licensee’s ability to foresee and predict.

The inspectors also reviewed the licensee's implementation of the 7300 system printed circuit board replacement program. This program is risk-ranked and applies reasonable priorities on highly risk-significant and single-point vulnerabilities associated with safety-related aspects of plant operation and reactor protection. The replacement program is well underway and the inspectors determined the prioritization of the cards in the system to reasonable.

The inspectors also noted that the initial troubleshooting performed as a result of the elevated readings, were isolated to four, specific printed circuit boards, based on their unique function within the circuit loop. Moreover, these circuit cards were tested under the normal analog channel operational testing procedures, and the source of the elevated readings could not be identified as the boards test results were satisfactory.

Corrective Actions: The licensee performed an operational test of the affected channel on September 27, 2018, and identified no issues. Subsequently, during the refueling outage on October 21, 2018, the licensee proactively replaced the four printed circuit boards that were considered relevant to the setpoint value exceedance that existed for those approximate 38 hours in September.

In addition, the licensee enhanced the instrument trend review to ensure timely identification of this potential "silent failure" to ensure future failures or erratic operation of circuit boards can be addressed appropriately, for these important technical specification and reactor protection systems.

Corrective Action Reference: Action Request 02282344

Performance Assessment: The NRC determined this violation was not reasonably foreseeable and preventable by the licensee and therefore is not a performance deficiency. Specifically, the inspectors noted that there were no significant failures or intermittent failures in the industry of the specific type of printed circuit boards that would have warranted replacement prior to the occurrence in September 2018. Moreover, the inspectors also noted the licensee had established a circuit card replacement program, which contained reasonable single point vulnerability and risk prioritization attributes to drive decision-making on card status.

Enforcement: The ROP's significance determination process does not specifically consider a violation without a finding in its assessment of licensee performance. Therefore, it is necessary to address this violation using traditional enforcement to adequately deter non-compliance.

Severity: The inspectors determined that the violation was a condition prohibited by Technical Specifications of very low safety significance, and consistent with Enforcement Policy Section 2.2.2.d, a Severity Level IV violation.

Violation: Technical Specification 2.2.1, "Reactor Trip System Instrumentation Setpoints," requires that reactor trip system instrumentation and interlock setpoints shall be consistent with the trip setpoint values shown in Technical Specification 2.2.1. In addition, Table 2.2-1, item 8, notes 3 and 4, refer to calculations and values that also reference allowable values contained in the cycle dependent Core Operating Limits Report. Technical Specification 2.2.1.b further states that with setpoints less conservative than the values shown in TS Table 2.2-1, either adjust the setpoint consistent with the setpoint value in Table 2.2-1, or declare the channel inoperable until the channel is restored to operable status.

Contrary to the above, the applicable channel of overpower delta temperature exceeded the technical specification allowable value for approximately 38 hours between September 25 and September 26, without taking the applicable actions to place the channel in the tripped condition in 6 hours consistent with Technical Specification 2.2.1.b.2.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

The disposition of this violation closes Licensee Event Report 2018-003-00.

Inoperable Charging System Valve Resulting in a Condition Prohibited by Technical Specifications			
Cornerstone	Severity	Cross-cutting Aspect	Report Section
Not Applicable	Severity Level IV NCV 05000443/2019001-02 Open/Closed	Not Applicable	71153

The inspectors identified a self-revealing, Severity Level IV, non-cited violation of Technical Specification 3.5.2, “Emergency Core Cooling Systems,” which occurred when two centrifugal charging pump emergency core cooling system subsystems were inoperable. Specifically, the 'B' centrifugal charging pump had been out of service for more than 12 hours for maintenance when it was discovered that the 'A' centrifugal charging pump's minimum flow isolation valve would not automatically close.

Description: On July 25, 2018, 'B' train centrifugal charging pump was tagged out of service for maintenance in accordance with “Charging Pump A & B Quarterly Flow and Valve Stroke Test.” The 'B' charging pump had been out of service for more than 12 hours when it was discovered that the 'A' centrifugal charging pump minimum flow isolation valve would not automatically close.

The purpose of the minimum flow bypass line is to recirculate discharge flow from the centrifugal charging pump to the pump suction after cooling via the seal water heat exchanger. In the event of an accident, the centrifugal charging pump's minimum flow isolation valve is designed to automatically close. When the minimum flow isolation valve closes, the centrifugal charging pump's total flow is directed to the emergency core cooling system.

The licensee identified that a Westinghouse 7300 printed circuit board responsible for providing signals to the 'A' minimum flow isolation valve had experienced a silent failure. Although the board was energized, the nature of the failure prevented both an output signal to reposition the valve and indication of failure. Technical Specification 3.5.2 requires two independent emergency core cooling systems with one operable centrifugal charging pump and its operable flow path. The combination of the inoperable valve and inoperable charging pump caused a condition prohibited by technical specifications, because the ‘A' train did not have an operable flow path and 'B' train did not have an operable charging pump. The licensee reported this to the NRC via Licensee Event Report 2018-002-00 on September 19, 2018, in accordance with 10 CFR 50.73 requirements.

Corrective Actions: The licensee identified the faulty printed circuit board, replaced it, and performed a successful retest on July 26, 2018. The licensee investigated the cause of failure and determined the valve had failed open on July 8, 2018, and had been inoperable for 17 days. The licensee entered the issue into the corrective action program, and performed a past operability/functionality review that determined the 'A' charging pump would perform its emergency core cooling system safety function with the inoperable valve in the open position.

Corrective Action Reference: Action Request 02273539

Performance Assessment: The NRC determined this violation was not reasonably foreseeable and preventable by the licensee and therefore is not a performance deficiency. Specifically, the inspectors noted that there were no significant failures or intermittent failures in the industry of the specific type of printed circuit boards that would have warranted replacement prior to the occurrence in July 2018. Moreover, the inspectors also noted the

licensee had established a printed circuit board replacement program, which contained reasonable single point vulnerability and risk prioritization attributes to drive decision-making on card status. While these circuit boards have been known to fail on occasion, the inspectors determined, because this was a random circuit board failure, the large population of circuit boards in various protection and control systems, the existence of the proactive replacement program, and that the board in question experienced a silent failure that was not readily identifiable, it was reasonable to conclude the issue was not foreseeable and preventable, and therefore, there is no performance deficiency.

Enforcement: The ROP's significance determination process does not specifically consider a violation without a finding in its assessment of licensee performance. Therefore, it is necessary to address this violation using traditional enforcement to adequately deter non-compliance.

Severity: The inspectors determined that the violation was a condition prohibited by Technical Specifications of very low safety significance, and consistent with Enforcement Policy Section 2.2.2.d, a Severity Level IV violation.

Violation: Technical Specification 3.5.2 "Emergency Core Cooling Systems," requires two independent emergency core cooling system subsystems to be operable, which includes one operable centrifugal charging pump, and an operable flow path capable of taking suction from the refueling water storage tank on a safety injection signal and automatically transferring suction to the containment sump during the recirculation phase of operation. The associated action requirement (a) allows a single system to be inoperable for 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

TS 3.0.3 requires that when an LCO is not met, within 1 hour action shall be initiated to place in the unit in a MODE in which the specification does not apply. It further requires that the unit be placed in hot standby within the next 6 hours.

Contrary to the above, on July 25, 2018, the licensee was in Mode 1 "Power Operation" while the 'A' flow path had been inoperable for 17 days. This exceeded the 7 day allowed outage time by approximately 10 days for TS 3.5.2. Further, the inoperability of both emergency core cooling system subsystems for over 12 hours exceeded the allowable timeframe in TS 3.0.3.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

The disposition of this violation closes Licensee Event Report 2018-002-00.

EXIT MEETINGS AND DEBRIEFS

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

- On April 18, 2019, the inspector presented the quarterly resident inspector inspection results inspection results to Mr. Eric McCartney, Site Vice President and other members of the licensee staff.
- On January 31, 2019, the inspector presented the radiation safety inspection results to Ms. Teri Smith and other members of the licensee staff.