

# Brunswick 2

## 1Q/2007 Plant Inspection Findings

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### Initiating Events

**Significance:**  Mar 31, 2007

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Incorrect Fuel Assembly Moved to Core**

A self-revealing non-cited violation of Technical Specification 5.4.1, Administrative Controls (Procedures) was identified for failing to follow the Core Component Sequence Sheet for Refueling Outage B218R1 during fuel movement on Unit 2. This resulted in the incorrect fuel assembly being loaded in core location 11-14 which caused an unanalyzed change in core shutdown margin. This issue was entered into the corrective action program for resolution.

The finding was more than minor because it was associated with configuration control of Unit 2 core and affected the Initiating Events Cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety function during shutdown as well as power operations. The finding was assessed using the Significance Determination Process for Reactor Inspection Findings for Shutdown Operations and determined to be of very low safety significance (Green) because it did not contribute to a loss of decay heat removal or a loss of reactor coolant system inventory. This finding has a crosscutting aspect of Human Performance, Work Practices, because the incorrect fuel movement was the result of a human error which was not prevented by the use of self and peer checking human error prevention techniques (Section 1R20).

Inspection Report# : [2007002](#) (*pdf*)

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### Mitigating Systems

**Significance:**  Feb 23, 2007

Identified By: NRC

Item Type: FIN Finding

#### **Failure to Adequately Evaluate and Correct Condition Adverse to Quality Resulting in 2C CSW Pump Failure**

A self-revealing, non-cited violation of 10CFR50, Appendix B, Criteria XVI, "Corrective Action," was identified for the failure to take adequate corrective actions to prevent a failure of the 2C Conventional Service Water (CSW) pump on July 26, 2006, due to corrosion of the pump shaft coupling. Specifically, the licensee failed to implement timely preventive maintenance to inspect the condition of pump shaft based on previous indications of pump shaft corrosion. The licensee entered the deficiency into their corrective action program as Action Request 201240 and completed inspections of the remaining pumps susceptible to similar corrosion.

The finding is more than minor because it was associated with the equipment performance attribute of the mitigating systems cornerstone and affects the cornerstone objective of ensuring the availability of systems that respond to initiating events. The failure of the 2C CSW pump shaft coupling affected the availability of the CSW system. Using the Phase 1 worksheet in Manual Chapter 0609, "Significance Determination Process," the finding is determined to be of very low safety significance because it is not a design or qualification deficiency, does not result in an actual loss of service water safety function, and does not screen as potentially risk significant for external events. The contributing cause of this finding involved the appropriate and timely corrective actions aspect of the Problem Identification and Resolution cross-cutting cornerstone (4OA2.a.(3)(i)).

Inspection Report# : [2007007](#) (*pdf*)

**G****Significance:** Dec 31, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Periodically Calibrate Service Water Pump Discharge Pressure Gages**

An NRC-identified non-cited violation of 10CFR50, Appendix B, Criteria XII, Control of Measuring and Test Equipment, was identified for failing to periodically calibrate the Units 1 and 2 service water pump discharge pressure gages. As a result, the quality of the test data collected from the gages, used to satisfy ASME Section XI in-service test requirements and performed to demonstrate pump operability, was compromised. This issue was entered into the corrective action program for resolution.

The finding was more than minor because it was associated with service water pump equipment performance and affected the Mitigating System Cornerstone objective to ensure the capability of system that respond to initiating events to prevent undesirable consequences. In addition, if left uncorrected the finding could potentially become a more significant safety concern because the issue affected all the site's service water pumps and degraded pump performance could go undetected. The finding was determined to be of very low safety significance (Green) because it did not result in the loss of safety function of a service water pump (Section 1R22.2).

Inspection Report# : [2006005](#) (*pdf*)**Significance:** N/A Jul 05, 2006

Identified By: NRC

Item Type: FIN Finding

**95001 Supplemental Inspection**

This supplemental inspection was conducted in accordance with Inspection Procedure 95001, to assess the licensee's evaluation associated with a Unit 2 performance indicator in the initiating events cornerstone. The Unplanned Power Changes per 7000 Critical Hours Performance Indicator crossed the threshold from Green (very-low risk significance) to White (low-to-moderate risk significance) in the fourth quarter of 2005. Specifically, the licensee experienced two unplanned power changes in the second quarter of 2005, one unplanned power change in the third quarter of 2005, and four unplanned power changes in the fourth quarter of 2005. The first unplanned power change, which occurred on April 20, was the result of a downpower initiated to remove the 2B reactor feed pump from service following an impeller failure which occurred on April 19. The second unplanned power change, which occurred on June 25, was the result of a downpower initiated to stabilize condenser vacuum following the trip of the 2B circulating water pump. The third unplanned power change, which occurred on August 5, was the result of placing Unit 2 in cold shutdown due to declaring all site emergency diesel generators (EDGs) inoperable. The fourth, fifth and sixth unplanned power changes, which occurred on November 8, 14, and 25, respectively, were the result of downpowers initiated to effect repairs on condenser tube leaks. The seventh unplanned power change, which occurred on December 13, was the result of a downpower caused by tripping of the 2B recirculation pump.

The licensee's problem identification, root cause and extent-of-condition evaluations, and corrective actions for the seven downpowers were adequate.

Inspection Report# : [2006007](#) (*pdf*)**G****Significance:** Jun 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Follow Engineering Change Procedure Resulting in Inoperable Reactor Core Isolation Cooling System**

An NRC-identified non-cited violation was identified for failure to meet Technical Specification (TS) 5.4.1, Procedures. Specifically, the temporary modification process was not followed when implementing a temporary change to the Unit 2 reactor core isolation cooling keepfill system. As a result, appropriate reviews of the impact on reactor core isolation cooling system operability were not performed. This resulted in the Unit 2 reactor core isolation cooling system being inoperable due to the potential of voiding the reactor core isolation cooling pump discharge piping during certain scenarios.

This finding is more than minor because it is associated with operating equipment lineup and affected the Mitigating System Cornerstone objective to ensure the reliability of systems that respond to initiating events to prevent undesirable

consequences. The finding was determined to be of very low safety significance (Green) because it did not represent an actual loss of safety function for greater than the TS allowed outage time. The inspectors determined that the cause of this finding is a performance aspect of the human performance cross-cutting area, in that the cause was due to personnel failing to follow the temporary modification process (Section 1R04).

Inspection Report# : [2006003](#) (*pdf*)

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## Barrier Integrity

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## Emergency Preparedness

**Significance:**  Sep 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

### Potential Reduction in Effectiveness of Emergency Plan

An NRC-identified non-cited violation of 10 CFR 50.54(q) was identified for the failure to determine if the introduction or the increasing of air into the offgas flowpath for the purpose of reducing steam jet air ejector radiation monitor readings would reduce the effectiveness of the site Emergency Plan. The deficiency associated with this finding is that a 50.54(q) review was not performed to determine if there would be a potential reduction in the effectiveness of the site Emergency Plan because emergency action level classifications for both an Unusual Event and an Alert are based on radiation level readings from the steam jet air ejector radiation monitor. The procedure change which allowed the introduction of air into the offgas flowpath, and the implementation of the procedure on June 1, 2006 did not have associated 50.54(q) reviews.

The finding was greater than minor because it is associated with the Emergency Preparedness Cornerstone and potentially affected the program elements of 10 CFR 50.54(b)(4). The finding was of very low safety significance because the licensee performed an analysis of the potential affects of the range of airflow rates on the radiation monitor readings which demonstrated that the emergency action level values would not have been detrimentally affected.

Inspection Report# : [2006004](#) (*pdf*)

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## Occupational Radiation Safety

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## Public Radiation Safety

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## Physical Protection

[Physical Protection](#) information not publicly available.

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## Miscellaneous

**Significance:** N/A Feb 23, 2007

Identified By: NRC

Item Type: FIN Finding

**Corrective action program**

The team concluded that in general, problems were adequately identified and evaluated, and effective corrective actions were implemented. The team found that established thresholds for identifying and classifying issues were appropriately low. However, several instances were identified where adverse conditions were not adequately evaluated and corrective actions were not implemented in a timely manner to prevent recurrence of equipment related problems. Corrective action program goals for completing evaluations and implementing corrective actions were sometimes not met because of competing priorities and lack of management enforcement of timeliness goals. One NCV was identified involving ineffective and untimely corrective actions associated with the failure of a conventional service water pump due to shaft corrosion.

Operating experience was adequately evaluated for applicability to the plant, however, several examples were identified where external operating experience was not used effectively, such as with industry material corrosion controls, which resulted in service water pump and valve stem equipment failures prior to the implementation of appropriate preventive maintenance. The licensee's audits and self-assessments were effective at identifying issues and entering them into the corrective action program. These audits and assessments identified issues similar to those identified by the NRC with respect to repetitive significant equipment failures due in part to untimely and ineffective implementation of preventive maintenance. Based on discussions with licensee employees during the inspection, personnel felt free to report safety concerns.

Inspection Report# : [2007007](#) (*pdf*)

Last modified : June 01, 2007