

Brunswick 2

1Q/2009 Plant Inspection Findings

Initiating Events

Significance:  Dec 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Plant Procedures for Assembly of Safety Relief Valves

A self-revealing Green NCV of Technical Specification (TS) 5.4.1, Procedures, was identified when the licensee failed to correctly reassemble the pilot valve for the Unit 2 Safety Relief Valve (SRV) H. The plant procedure for assembly of the pilot valve, OCM-VSR-509, Main Steam Relief Valves Target Rock Model 7567 Air Operators and Pilot Assembly, Disassembly, Inspection, and Reassembly, used in 2006 for the Unit 2 SRV H pilot valve specifies that, during assembly, the pilot spring should be placed inside of the pilot valve spring follower. Contrary to this requirement, the pilot valve was assembled with the pilot spring on the ledge of the pilot valve spring follower. The incorrectly assembled pilot valve was installed in Unit 2 in March, 2007 on SRV 'H'. On November 9, 2008, the spring slipped off the ledge of the spring follower, reducing the SRV set point pressure, and causing the SRV to lift at normal operating pressure. The licensee replaced the failed SRV and initiated a root cause analysis to determine the primary and contributing cause of this event.

The failure to assemble the SRV pilot per procedure was identified as a performance deficiency. The performance deficiency was more than minor because it is associated with the equipment performance attribute of the Initiating Events cornerstone, and it affected the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. The finding was determined to be of very low safety significance because the finding does not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available. The finding has a cross-cutting aspect of procedural compliance, as described in the Work Practices component of the Human Performance cross-cutting area because the licensee failed to follow the procedure as written (H.4(b)).

Inspection Report# : [2008005](#) (*pdf*)

Mitigating Systems

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Perform a 10 CFR 50.59 Evaluation for a Plant Modification

The inspectors identified a severity level IV NCV of 10 CFR 50.59, "Changes, Tests, and Experiments" for failing to perform a written safety evaluation prior to implementing a change to the facility as described in the Updated Final Safety Analysis Report (UFSAR), when the Unit 1 and Unit 2 reactor building instrument air standby compressors were permanently abandoned. The licensee entered the issue into their corrective action program and performed a written safety evaluation of the condition.

The inspectors determined that, until identified by NRC inspectors, the licensee had not performed a 10 CFR 50.59 safety evaluation for the abandonment of the instrument air standby compressors, and this is a performance deficiency. Because this is a violation of 10 CFR 50.59, it is considered to be a violation which potentially impedes or impacts the regulatory process. Therefore, such violations are dispositioned using the traditional enforcement process instead of the Significance Determination Process. This finding was determined to be more than minor because there was a reasonable likelihood that the change requiring a 10 CFR 50.59 safety evaluation would require Commission

review and approval prior to implementation in accordance with 10 CFR 50.59(c)(2). This likelihood is based on the increased likelihood of loss of reactor building instrument air, reactor scram, and closure of the outboard MSIVs, which is an occurrence of a malfunction of a structure, system, or component (SSC) that is analyzed in the UFSAR. To determine the significance of the violation, the inspectors completed a significance determination review using IMC 0609, Appendix A, Significance Determination of Reactor Inspection Findings for At Power Situations. The finding impacted the initiating events cornerstone. Because the finding does not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available, this finding has very low safety significance. The cause of the finding is not related to a cross-cutting aspect because the performance deficiency is not indicative of current licensee performance.

Inspection Report# : [2009002](#) (*pdf*)

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Procedures During Reactor Head Disassembly

A self-revealing Green NCV of TS 5.4.1, Procedures, was identified when reactor head piping was disconnected prior to swapping shutdown range reactor water level transmitters resulting in inaccurate water level indication. The plant procedure for disconnection of the reactor head piping, 0SMP-RPV501, Reactor Vessel Disassembly, used in conjunction with 0GP-06, Cold Shutdown to Refueling, specifies that prior to removal of head piping, the Shutdown Range Reactor Water level Transmitters shall be swapped from level transmitters, B21-LT-NO27A and B21-LT-NO27B, to level transmitters, B21-LT-7468A and B21-LT-7468B. Contrary to this requirement, the common reference leg to the level indicators was disconnected prior to swapping transmitters which resulted in loss of accurate indication of current reactor vessel water level. The licensee reinstalled the disconnected piping and entered the issue into their corrective action program.

The disconnection of the reference leg flange of the reactor vessel head piping prior to realignment of level instrumentation as required per procedure was identified as a performance deficiency. The performance deficiency was more than minor because it is associated with the configuration control attribute of the Mitigating Systems cornerstone, and it affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The level indication inaccuracy degraded the plant operators' ability to control the reactor vessel water level in the prescribed procedural band and would inhibit their ability to diagnose and prevent a Loss of RHR scenario. In accordance with NRC Inspection Manual Chapter (IMC) 0609, Appendix G, "Shutdown Operations Significance Determination Process," Attachment 1, Checklist 8, the inspectors conducted a Phase 1 SDP screening and determined the finding to require a Phase 2 analysis. The Phase 2 analysis determined the finding to be of very low safety significance (Green) because adequate mitigation capability was maintained. The cause of this finding was directly related to the work activity coordination cross-cutting aspect in the work control component of the Human Performance cross-cutting area because the plant operators and maintenance personnel failed to effectively communicate and coordinate the activities associated with the vessel head disassembly (H.3.(b)).

Inspection Report# : [2009002](#) (*pdf*)

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Unauthorized Maintenance Results in Loss of Shutdown Cooling

A self-revealing Green NCV of TS 5.4.1, Procedures, was identified when the licensee changed the position of 2-E11-F009, the shutdown cooling (SDC) inboard suction throttle valve, without following a procedure. On March 26, Unit 2 was in Mode 5 in a refueling outage with the reactor refueling cavity flooded and fuel pool gates removed. Decay heat removal was being provided by protected systems, RHR loop B and supplemental spent fuel pool cooling. ADM-NGGC-0104, Work Management Process, states the maintenance that has an impact on system operation must be performed according to written instructions. Contrary to this requirement, a maintenance technician working without written instructions, operated the 2-E11-F009 valve locally in the drywell in the close direction, tripping the only

operating RHR pump due to an electrical interlock. The licensee restored the RHR system to operation and entered the issue into their corrective action program.

The operation of 2-E11-F009, the shutdown cooling (SDC) inboard suction throttle valve, during a maintenance activity was identified as a performance deficiency. The finding is more than minor because it affects the human performance attribute of the Initiating Events cornerstone and the objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. The inspectors evaluated this finding using Attachment 1 of IMC 0609, Appendix G, "Shutdown Operations Significance Determination Process." This finding is of very low safety significance because the finding did not represent a loss of control and did not require quantitative assessment per Checklist 7 of Attachment 1 to IMC 0609, Appendix G. Specifically, the reactor time-to-boil during this event was approximately 36 hours and RHR was restored in 17 minutes. Additionally, during the time that RHR was secured, the supplemental spent fuel pool cooling system provided sufficient decay heat removal. The finding has a cross-cutting aspect of human error prevention, as described in the Work Practices component of the Human Performance cross-cutting area because maintenance supervision and the maintenance technician failed to follow the station's policy for work on protected train equipment and use the human error prevention tools associated with the protected train concept. (H.4.(a)).

Inspection Report# : [2009002](#) (pdf)

Significance:  Dec 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Take Prompt Corrective Actions for Low Oil Level in the 2B RHRSW Booster Pump

The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" for failure to assure that a condition adverse to quality was promptly corrected, which resulted in the licensee declaring the 2B residual heat removal service water (RHRSW) booster pump inoperable while responding to the Unit 2 reactor scram on November 9, 2008. The licensee added oil to the bearing, restored the RHRSW to operable and entered the issue into the Corrective Action Program (CAP).

The deficiency associated with this event is not promptly investigating and correcting the low oil level in the 2B RHRSW booster pump bearing.

The finding is more than minor because it affects the Mitigating Systems Cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e. core damage). It is also associated with the cornerstone attribute of equipment availability and reliability. Since the finding affects both core damage frequency (CDF) and suppression pool cooling, an evaluation using NRC Inspection Manual Chapter (IMC) 0609, Appendix H, "Containment Integrity Significance Determination Process" was performed. Appendix H table 4.1 lists suppression pool cooling as a contributor to late containment failure, but not large, early release frequency (LERF). Therefore the change in CDF associated with the finding was used to characterize its significance. Using the NRC, pre-solved phase two significance determination process worksheets, the change in core damage frequency was found to be less than 1E-6, therefore this finding is of very low safety significance (Green). The cause of the finding is related to the cross-cutting aspect of thoroughly evaluating problems as described in the Corrective Action Program component of the Problem Identification and Correction cross-cutting area, since the low oil level was identified, but a thorough investigation of the problem was not promptly performed. (P.1(c))

Inspection Report# : [2008005](#) (pdf)

Significance:  Dec 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Inadvertent Rack Out of the 2A Core Spray Pump Circuit Breaker

A self-revealing Green NCV of TS 5.4.1, "Procedures," was identified for failure to comply with clearance order 180845 and 2OP-50, Plant Electric System Operating Procedure, Section 8.1, Racking Out a 4 KV Breaker."

Specifically, the 2A Core Spray pump breaker was inadvertently racked out instead of the Emergency Diesel Generator #3 output breaker. The licensee racked the 2A core spray breaker back into place and entered the issue into the CAP.

The failure to comply with clearance order 180845 and 2OP-50, Plant Electric System Operating Procedure, Section 8.1, Racking Out a 4 KV breaker was identified as a performance deficiency. The performance deficiency was more than minor because it impacted the equipment performance attribute of the Mitigating Systems Cornerstone objective to maintain the availability and reliability of systems that respond to initiating events to prevent undesirable consequences. The finding was determined to be of very low safety significance because the finding was not a design or qualification deficiency, did not represent a loss of system safety function, did not represent an actual loss of safety function of a single train for greater than its TS allowed outage time, did not represent an actual loss of safety function of one or more non-TS trains of equipment designated as risk-significant per 10 CFR 50.65 for greater than 24 hrs, and did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. The finding has a cross-cutting aspect of human error prevention, as described in the Work Practices component of the Human Performance cross-cutting area because the licensee inadvertently racked out the wrong breaker. H.4(a)
Inspection Report# : [2008005](#) (*pdf*)

Significance:  Dec 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Correctly Perform Biennial Written Examination for a Licensed Operator

The inspectors identified a non-cited violation of 10 CFR Part 55.59(a)(2) for failure to correctly evaluate and grade a written examination during the biennial requalification examination for licensed operators. The licensee operations training staff incorrectly allowed two correct answers for a question, where the answers were diametrically opposed (opposite one another) which is prohibited by the examination guideline NUREG-1021.

This finding is more than minor because if left uncorrected, it could become a more significant safety concern in that licensed operators would not be adequately tested to ensure an acceptable knowledge level for performing licensed duties. Using the Licensed Operator Requalification Significance Determination Process, this finding was determined to be of very low safety significance (Green) because the individual that failed was a part of a crew that passed their biennial examinations and no issues resulted during the actual watch standing of this crew. All other operators involved were able to perform assigned licensed duties. The finding was a result of the licensee not in compliance with the requirements of TAP-403, "Conduct of Examinations," and TAP-411, "Continuing Training Annual/Biennial Exam Development, Administration and Security." The finding was related to the cross-cutting aspect of procedural compliance of the work control component of the cross-cutting area of Human Performance (H.4(b)) because the examination developers did not comply with procedure requirements to ensure examination integrity was maintained. The licensee has initiated a root cause analysis to determine the primary and contributing causes of this event.

Inspection Report# : [2008005](#) (*pdf*)

Significance:  Jun 30, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Procedure for Performing Maintenance on the Control Room AC Subsystem

A self-revealing Green non-cited violation of Technical Specification 5.4.1 was identified for an inadequate procedure used to specify configuration controls during a maintenance activity. The configuration management program implementation procedure, ADM-NGGC-0106, was not clear in determining whether additional actions should be taken to ensure Control Room Air Conditioning (AC) operation while preventative maintenance was being performed on the CREV system. The three Control Room AC subsystems tripped inadvertently during the performance of this planned preventive maintenance activity due to the supply fan dampers drifting shut, resulting in Unit 1 and Unit 2 entering LCO 3.0.3. This issue was entered into the licensee's Corrective Action Program (CAP) as AR 281950.

The finding was more than minor because it impacted the mitigating systems cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences, and the related attribute of equipment performance. The finding was determined to be of very low

safety significance because it did not represent an actual loss of safety function for greater than the TS allowed outage time. The finding has a cross-cutting aspect in the area of Human Performance of complete documentation because the licensee did not provide an adequate procedure that provided clear guidance in identifying intrusive maintenance on the CREV system such that appropriate actions were taken to ensure proper operation during preventative maintenance. (H.2.(c))

Inspection Report# : [2008003](#) (*pdf*)

Barrier Integrity

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Maintenance Procedure for the Control Room Air Conditioning and Emergency Ventilation Instrument Air System

A self-revealing Green NCV of Technical Specification (TS) 5.4.1, Procedures, was identified for inadequate maintenance procedures for the control room air conditioning and emergency ventilation system instrument air dryer. As a result, on January 21, 2009, the control room air conditioning and emergency ventilation instrument air system lost air pressure, rendering the control room air conditioning (AC) system and the control room emergency ventilation (CREV) system inoperable. The licensee entered the issue into their corrective action program and changed maintenance and operating procedures to prevent recurrence.

The failure to implement adequate maintenance procedures for the control room air conditioning and emergency ventilation instrument air system is a performance deficiency. This performance deficiency is more than minor because it is associated with structure, system, and component (SSC), and barrier performance attribute of the Barrier Integrity Cornerstone. It also adversely affected the cornerstone objective of maintaining a radiological barrier for the control room. The finding was determined to be of very low safety significance because it only affected the radiological barrier function of the control room, and does not represent a degradation of the smoke or toxic atmosphere barrier function of the control room. The finding affects the cross-cutting area of human performance, resources component, complete and accurate documentation aspect because the licensee did not incorporate adequate guidance for maintaining the control room AC and CREV instrument air dryer in their maintenance procedures. (H.2.(c))

Inspection Report# : [2009002](#) (*pdf*)

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Significance:  Jun 30, 2008

Identified By: NRC

Item Type: FIN Finding

Failure to Conduct Adequate and Timely Evaluations of Onsite Groundwater Monitoring Well Tritium

Concentration Trend Data

The inspectors identified a Green finding (FIN) for failure to properly evaluate the potential causes of increased tritium (H-3) concentrations in groundwater samples collected and reviewed in accordance with Brunswick procedure E&RC-3250, "Environmental and Radiation Control." Specifically, the licensee failed to properly evaluate, and initiate actions to address increasing H-3 concentrations reported from 2003 through 2007 for quarterly samples collected from Environmental Sampling Station (ESS)-2C and ESS-16 monitoring wells. The failure to properly investigate the increasing H-3 concentrations resulted in the licensee continuing to attribute the subject results to a 1994 U2 radioactive liquid effluent waste line break without considering potential leakage of contaminated liquids from U2 storm drain piping.

This issue has been entered in the licensee's CAP as NCR 268357.

The finding is more than minor because it is associated with the Program and Process attribute of the Public Radiation Safety Cornerstone and adversely affects the cornerstone objective because it relates to effluent measurement and abnormal releases. The licensee's failure to recognize the increasing groundwater tritium concentrations delayed actions to address and correct abnormal liquid releases within the switchyard area. Using the Public Radiation Safety Significance Determination Process, this finding was determined to be of very low safety significance (Green) because the performance deficiency did not result in offsite releases and resultant offsite doses to members of the public and was not a failure to implement the effluent program. Furthermore, the finding did not prevent the licensee from initiating appropriate corrective actions to determine extent of the contamination and to mitigate its effect on the surrounding environs. The cause of the finding was related to the cross cutting area of human performance, the component of work practices, and the aspect involving supervisory oversight of work activities, because the licensee failed to properly evaluate monitoring well sample data to determine the possible radiological effects of plant operation on the local groundwater.

Inspection Report# : [2008003](#) (*pdf*)

Physical Protection

Although the NRC is actively overseeing the Security cornerstone, the Commission has decided that certain findings pertaining to security cornerstone will not be publicly available to ensure that potentially useful information is not provided to a possible adversary. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

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