

Surry 2

3Q/2010 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Demonstrate that the Reliability of Systems or Components were effectively controlled per 10 CFR 50.65 (a)(2)

The NRC identified a Green Non-Cited Violation of 10CFR50.65 a(2) for the licensee's failure to demonstrate that the reliability of High Safety Significant (HSS) systems and Low Safety Significant (LSS) systems in stand-by was being effectively controlled through the performance of appropriate preventative maintenance, such that the systems or components remain capable of performing their function. Specifically, the licensee's MR program would not demonstrate that a system should remain in category a(2) as defined by regulatory requirements.

The inspectors determined the licensee's MR program could not demonstrate that reliability of High Safety Significant (HSS) systems and Low Safety Significant (LSS) systems in stand-by were being effectively controlled through the performance of appropriate preventative maintenance, such that the systems or components remain capable of performing their function is a performance deficiency. Specifically, the monitoring established by the license did not effectively demonstrate that systems in a(2) were being effectively controlled through performance of appropriate preventative maintenance. This masking of poor equipment performance does not allow the licensee to determine if a system should be in increased monitoring of a(1).

The finding was more than minor because it adversely affected the equipment performance attribute of the reactor safety mitigating systems cornerstone, and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of HSS and LSS systems to perform their functions when required. Specifically, multiple HSS and LSS systems could have a high probability of failure, because poor equipment performance would not be recognized by the licensee. This could prevent a poor performing system from being placed into the a(1) category when required and appropriate corrective action would not be taken.

The finding was evaluated using MC-0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings," and determined to be of very low safety significance (Green), because the finding did not involve an actual failure of equipment. This finding had a crosscutting aspect in the area of human performance and resources because the licensee did not ensure that personnel, procedures, and other resources were available and adequate to assure proper implementation of MR program. The MR personnel did not have the training required to implement the program within the required industry regulations and guidelines (H.2.b).

Inspection Report# : [2010003](#) (*pdf*)

Significance:  Mar 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to identify a non-conservative error in the quarterly TS surveillance for the Unit 1 A battery

The inspectors identified a Green NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action" for failure to identify that a non-conservative error had been introduced into the Unit 1 A main station battery quarterly technical specification surveillance procedure (CR 366388). The licensee modified the procedure to eliminate the non-conservative error.

The inspectors determined the failure to identify a non-conservative error which was introduced into the TS quarterly surveillance procedure following the replacement of individual battery cells, was a condition adverse to quality and a performance deficiency which was reasonably within the licensee's ability to foresee and correct, and should have been prevented. The finding was more than minor because if left uncorrected the non-conservative error in 1-EPT-0103-01 would have the potential to lead to a more significant safety concern. Specifically, this is because the error was large enough to mask cell degradation and an inoperable cell. The finding was associated with the equipment performance attribute of the reactor safety mitigating systems cornerstone, and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of the safety related 125 VDC station batteries that provide class 1E backup power to risk significant components needed to prevent undesirable consequences during a loss of offsite power event. The finding was evaluated using MC-0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," and determined to be of very low safety significance (Green) because operability of the Unit 1 A battery was not lost and the error was removed prior to the next quarterly surveillance. This finding had a cross cutting aspect in the area of problem identification and resolution because the licensee did not evaluate and communicate relevant external OE, including vendor recommendations, to affected internal stakeholders in a timely manner (P.2(a)). Specifically, the caveat to have cells on a float charge for 72 hours was not fully evaluated when the battery cells were replaced.

Inspection Report# : [2010002](#) (*pdf*)

Barrier Integrity

Significance:  Dec 31, 2009

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Inoperability of MCR isolation Damper 1-VS-MOD-103D due to failure to promptly identify and correct internal hydraulic leakage

A self-revealing Green NCV of 10 CFR 50 Appendix B, Criterion XVI, was identified for the failure to correct a condition adverse to quality which led to main control room isolation damper 1-VS-MOD-103D being inoperable for approximately 19 hours on September 21-22, 2009 (CR 349075). The actuator was repaired and is scheduled for replacement in 2010.

The finding, associated with the performance attribute of the barrier integrity cornerstone, is more than minor because it adversely affected the cornerstone objective, as it relates to control room integrity, to provide reasonable assurance physical design barriers protect public health and safety. The finding, evaluated per MC-0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings," was determined to be of very low safety significance (Green) because it did not result in a loss of safety function or loss of a single train of the control room isolation boundary for more than its allowed outage time. This finding has a crosscutting aspect in the area of human performance, resources, in that equipment and other resources were not made available to assure nuclear safety by minimizing preventative maintenance deferrals (H.2.a).

Inspection Report# : [2009005](#) (*pdf*)

Significance:  Dec 31, 2009

Identified By: Self-Revealing

Item Type: FIN Finding

Failure to perform an adequate operability determination for main control room isolation damper 1-VS-MOD-103D

A self-revealing Green Finding was identified for the incorrect operability determination of main control room isolation damper 1-VS-MOD-103D. The damper, declared operable and left in-service following loss of power to its hydraulic pump on September 21, 2009 (CR 349003), failed to close on demand, on September 22, 2009. The damper was inoperable for approximately 19 hours (CR 349075) before power was restored to the pump, the damper closed, and the actuator repaired.

The finding, associated with the performance attribute of the barrier integrity cornerstone, is more than minor because

it adversely affected the cornerstone objective as it relates to control room integrity, to provide reasonable assurance physical design barriers protect public health and safety. The finding, evaluated per MC-0609, Attachment 4, “Phase 1 – Initial Screening and Characterization of Findings,” was determined to be of very low safety significance (Green) because it did not result in a loss of safety function or the loss of a single train of the control room isolation boundary for more than its allowed outage time. This finding has a cross-cutting aspect in the area of problem identification, corrective action program, in that an adequate operability assessment that thoroughly evaluated the degraded condition of 1-VS-MOD-103D was not performed (P.1.c).

Inspection Report# : [2009005](#) (*pdf*)

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

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

Last modified : November 29, 2010