

Farley 2

1Q/2013 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Mar 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Perform 50.59 Evaluation for Replacement of TDAFW Pump Governor

Green. An NRC-identified Green finding and associated Severity Level IV, NCV, of 10 CFR 50.59(d)(1), were identified for the failure to perform an evaluation of a turbine-driven auxiliary feed water (TDAFW) pump governor modification on Units 1 and 2 against the criteria in 10 CFR 50.59(c)(2), as directed by site procedure NMP-AD-010 and the self-imposed industry guidelines in Nuclear Energy Institute document NEI 96-07, Revision 1, for the implementation of 10 CFR 50.59. The licensee entered the issue in the corrective action program as condition report (CR) 606427 and addressed the operability of the TDAFW pumps. In addition, one of the corrective actions of the CR is the completion of the required 50.59 evaluation.

The licensee's failure to perform a 50.59 evaluation as required by 10 CFR 50.59(d)(1) was a performance deficiency. This performance deficiency was more-than-minor because it is associated with the design control attribute of the mitigating systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the licensee did not fully demonstrate that the availability, reliability, and capability of the TDAFW pump would be maintained through the modification of the pump governor. Additionally, the failure to perform a 50.59 evaluation was determined to be more-than-minor in accordance with the guidance in the NRC Enforcement Manual for traditional enforcement violations because there was a reasonable likelihood that the change could require Commission review and approval prior to implementation. The inspectors evaluated the significance of the finding using Inspection Manual Chapter 0609, "Significance Determination Process (SDP)," and determined the finding was of very low safety significance (Green). In accordance with the NRC Enforcement Policy, the violation of 10 CFR 50.59 was determined to be a Severity Level IV violation because it resulted in a condition evaluated as having very low safety significance (i.e., Green) by the SDP. This finding has a cross cutting aspect in the decision making component of the human performance area because the most significant causal factor of the performance deficiency was that the licensee did not use conservative assumptions in the determination of whether the TDAFW governor modification introduced adverse effects that required a 50.59 evaluation. [H.1(b)].

Inspection Report# : [2013002](#) (*pdf*)

Significance: G Jun 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to implement design control measures to verify the adequacy of CST design

The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to implement design control measures to verify the adequacy of design inputs, assumptions, or limiting plant conditions which were relied upon in the design basis analyses used to demonstrate the adequacy of

condensate storage tank (CST) design. The licensee entered these issues into their corrective action program as condition reports 351170, 353599, and 355457. The licensee performed operability evaluations in support of current operability and implemented additional compensatory measures to ensure that CST level would be maintained above the condenser hotwell make-up elevation pending completion of proposed long term corrective actions. These proposed corrective actions included the more detailed design basis analysis required to support a license amendment request to increase the minimum volume of water specified by the limiting condition for operation in Technical Specification 3.7.6.

The failure to utilize conservative design inputs, assumptions, or limiting plant conditions when implementing design control measures to verify the adequacy of CST design was a performance deficiency. The performance deficiency was determined to be more than minor because it was associated with the mitigating systems cornerstone attribute of design control and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. In accordance with NRC inspection manual chapter 0609.04, "Initial Screening and Characterization of Findings," the inspectors used the mitigating systems column to perform a phase 1 significance determination process screening, and determined the finding to be of very low safety significance (Green). This determination was based on the fact that the performance deficiency was not a design issue resulting in loss of function, did not represent an actual loss of a system safety function, did not result in exceeding a Technical Specification allowed outage time, and did not affect external event mitigation. A cross-cutting aspect was not identified because the design basis calculation associated with the performance deficiency was last approved on March 25, 1999, and therefore, did not represent current licensee performance. (Section 1R21.1)

Inspection Report# : [2012003](#) (*pdf*)

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Significance:  Jun 30, 2012

Identified By: NRC

Item Type: FIN Finding

Failure to monitor for auxiliary building airborne radioactivity levels as described in the FSAR

The inspectors identified a Green finding for failure to meet the FSAR continuous online radiation monitor design bases as described in FSAR Section 12.2.4, Airborne Radioactivity Monitoring. Specifically, six of the nine continuous online radiation monitors, R-30 series, provided to monitor airborne radiation concentrations within select Unit 1 and Unit 2 Auxiliary Building locations have been out of service (OOS) for extended periods of time over the past two and half years. Further, no reviews were completed to evaluate the significance of the OOS monitors nor were compensatory sampling activities performed during the extended OOS periods. The licensee entered this issue into their corrective action program as Condition Report (CR) 44407, and CR 463051, and implemented compensatory activities.

The inspectors determined that the failure to monitor airborne radioactivity levels as described in FSAR Section 12.2.4 was a performance deficiency. The finding is greater than minor because it is associated with the Occupational Radiation Safety Cornerstone attribute of Plant Facilities/Equipment and Instrumentation and adversely affects the cornerstone objective of ensuring the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. Inadequate monitoring of areas with the potential for airborne radioactivity could lead to worker contamination and increased exposure. The finding was assessed using the Occupational Radiation Safety Significance Determination Process (SDP). Based on the facts that this was not an ALARA planning issue, there were no overexposures nor substantial potential for overexposures, and the licensee's ability to assess worker dose was not compromised, the finding was determined to be of very low safety significance (Green). This finding has a cross-cutting aspect in the area of Human Performance [H.2(d)] because the licensee did not ensure that equipment was adequate and available to assure nuclear safety. (Section 2RS5)

Inspection Report# : [2012003](#) (*pdf*)

Public Radiation Safety

Security

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

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