

Brunswick 1

2Q/2013 Plant Inspection Findings

Initiating Events

Significance: G Mar 31, 2013

Identified By: NRC

Item Type: FIN Finding

Failure to Follow Procedure for Variable Frequency Drive Reactor Recirculation Pump Design Modification.

An NRC-identified Green finding was identified for the failure of the licensee to follow Procedure EGR-NGGC-0005, Engineering Change (EC), when performing the variable frequency drive (VFD) modification for the reactor recirculation pumps (RRPs). Specifically, between April 4, 2010 and the present, the licensee inappropriately used a Rapid Field Release (RFR) to revise the power supplies for the relays in the VFD system without re-evaluating the EC, the 10 CFR 50.59 Screen/Evaluation, and the Failure Modes and Effects Analysis (FMEA). This resulted in a new failure mode on a loss of the power supply causing a RRP runback and placing the plant in a flow transient, and a loss of cooling to the RRP seals. The licensee entered this issue into the corrective action program (CAP) as nuclear condition report (NCR) 581202.

The performance deficiency associated with this finding was the failure of the licensee to follow Procedure EGR-NGGC-0005, Engineering Change (EC), when performing the VFD modification for the RRPs. The finding was more than minor because it was associated with the design control attribute of the Initiating Events Cornerstone and affects the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, the VFD modification inappropriately causes a RRP runback on a loss of 480 VAC and core flow instability, and a loss of cooling to the RRP seals. Using IMC 0609, Appendix A, issued June 19, 2012, The SDP for Findings At-Power, the inspectors determined the finding was of very low safety significance because as a transient initiator due to the RRP runback, the finding did not cause a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition. The inspectors determined the finding was also of very low safety significance because as a loss of coolant accident (LOCA) initiator, after a reasonable assessment of degradation, the finding would not result in exceeding the reactor coolant system leak rate for a small break LOCA or likely affect other systems used to mitigate a LOCA resulting in a total loss of their function. The finding has a cross-cutting aspect in the area of human performance associated with the work control attribute because the licensee did not appropriately coordinate work activities by incorporating actions to address the impact of changes to the work scope, associated with the VFD modification, on the plant. [H.3(b)]

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

Significance: G Dec 31, 2012

Identified By: NRC

Item Type: FIN Finding

Inadequate Maintenance Procedure for Fluorescent Lights over Safety-related Equipment

•Green. The inspectors identified a Green finding for the licensee not having an adequate procedure for maintenance on fluorescent lights over safety-related equipment. Specifically, between plant startup and August 29, 2012, the licensee did not have instructions for closing S-hooks on fluorescent lights over safety related equipment during maintenance on the fluorescent lights. This resulted in over 40 S-hooks open in safety-related buildings which could result in fluorescent lights falling and impacting safety-related equipment during a seismic event. The licensee's

corrective actions included closing the open S-hooks and adding instructions for closing S-hooks to work order (WO) 431558. The licensee entered this issue into the CAP as NCR 551646.

The performance deficiency associated with this finding was the failure of the licensee to have an adequate procedure for maintenance on fluorescent lights over safety-related equipment. The finding was more than minor because if left uncorrected, the deficiencies could lead to a more significant safety concern. If left uncorrected, the failure to provide procedural guidance to close the S-hooks on fluorescent lights over safety-related equipment could lead to fluorescent lights falling on safety-related instruments during a seismic event resulting in a reactor trip. This finding is also associated with the design control attribute of the Initiating Events Systems Cornerstone. Using IMC 0609, Appendix A, issued June 19, 2012, The Significance Determination Process (SDP) for Findings At-Power, the inspectors determined the finding was of very low safety significance because the finding did not affect the design or qualification of a mitigating SSC, the finding did not represent a loss of system and/or function, the finding did not represent an actual loss of a function of a single train for greater than the TS allowed outage time, the finding did not represent an actual loss of a function of one or more non-TS trains of equipment, and did not screen as potentially risk-significant due to a seismic event since both S-hooks on one fluorescent light were not considered to be completely failed or unavailable, and the finding did not involve the total loss of any safety function. The finding has a cross-cutting aspect in the area of problem identification and resolution associated with the CAP attribute because the licensee did not identify the open S-hook issue completely, accurately, and in a timely manner commensurate with their safety significance during the Fukushima walkdowns. [P.1(a)] (Section 40A5)

Inspection Report# : [2012005](#) (*pdf*)

Mitigating Systems

Significance:  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Have Adequate Installation and Testing Instructions for the EDG Overspeed Boost Cylinder.

An NRC-identified Green NCV of 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, was identified for the failure of the licensee to have adequate installation and testing instructions for the EDG control oil system overspeed boost cylinder and accomplish the installation and testing in accordance with these instructions. The licensee replaced the boost cylinder and returned the EDG to operable. The licensee entered this issue into the corrective action program (CAP) as nuclear condition report (NCR) 567016.

The inspectors determined that the failure to properly install the EDG 3 overspeed boost cylinder and properly test the boost cylinder, to ensure the boost cylinder can perform its design basis function, was a performance deficiency. The finding was more than minor because it was associated with the design control attribute of the Mitigating Systems Cornerstone and affects the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to correctly install and test the EDG 3 overspeed boost cylinder resulted in the failure of EDG 3 to start and EDG 3 being declared inoperable on October 14, 2012. Using IMC 0609, Appendix A, issued June 19, 2012, the SDP for Findings At-Power, the inspectors determined the finding was of very low safety significance (Green) because the finding did not affect the design or qualification of a mitigating SSC, the finding did not represent a loss of system and/or function, the finding did not represent an actual loss of a function of a single train for greater than the TS allowed outage time, the finding did not represent an actual loss of a function of one or more non-TS trains of equipment, 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 in the area of human performance associated with the resources attribute because the licensee did not have complete, accurate and up-to-date design documentation, procedures, and work packages to install and test the EDG 3 overspeed boost cylinder. H.2(c)

Inspection Report# : [2013003](#) (pdf)

Significance:  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Adequately Lubricate the 1B Residual Heat Removal Cooler Damper

• An NRC-identified Green NCV of TS 5.4.1a, Procedures, was identified for the failure of the licensee to follow the procedure to properly lubricate the 1B RHR room cooler damper. The licensee lubricated the damper and returned the room cooler to operable, and entered this issue into the CAP as NCR 607514.

The inspectors determined that the failure of the licensee to properly lubricate the 1B RHR room cooler damper in accordance with Procedure OPM DMP500 was a performance deficiency. The finding was more than minor because it was associated with the human performance attribute of the Mitigating Systems Cornerstone and affects the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to lubricate the 1B RHR room cooler damper resulted in a failure of the cooler fan and damper, and the inoperability of the 1B RHR train. Using IMC 0609, Appendix A, issued June 19, 2012, the SDP for Findings At-Power, the inspectors determined the finding was of very low safety significance (Green) because the finding did not affect the design or qualification of a mitigating SSC, the finding did not represent a loss of system and/or function, the finding did not represent an actual loss of a function of a single train for greater than the TS allowed outage time, the finding did not represent an actual loss of a function of one or more non-TS trains of equipment, 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 in the area of human performance associated with the work practices attribute because the licensee did not define and effectively communicate expectations regarding procedural compliance to Procedure OPM-DMP500 and personnel did not follow this procedure. H.4(b)

Inspection Report# : [2013003](#) (pdf)

Significance:  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Design Control for Allowable Jacket Water Leak Rate

An NRC-identified Green NCV of 10 CFR 50, Appendix B, Criterion III, Design Control, was identified for the failure of the licensee to verify the adequacy of the design acceptance criteria for jacket water leakage to ensure EDG 3 could meet the design basis mission time of seven days. The licensee's corrective actions include developing a plan to fill the EDG jacket water system to ensure operation of the EDG for seven days. The licensee entered this issue into the CAP as NCR 615491.

The inspectors determined that the failure to ensure sufficient jacket water to the EDGs, with a jacket water leak, for the seven-day mission time, was a performance deficiency. The violation is more than minor because it is associated with the design control attribute of the Mitigating Systems Cornerstone and affects the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the calculational error assuming a four-day mission time versus a seven-day mission time results in a condition where there was reasonable doubt on the capability of an EDG when a jacket water leak exists. Using IMC 0609, Appendix A, issued June 19, 2012, the SDP for Findings At-Power, the inspectors determined the finding screened to a detailed risk evaluation because the finding represented an actual loss of function of at least a

single Train of EDG for greater than the TS Allowed Outage time. The regional SRA performed a Phase 3 analysis on the finding. The time to failure of the EDG due to the leak precluded any internal risk impact, since it exceeded 24 hours to failure. A screening calculation was performed to estimate the impact the finding would have on an extended loss of offsite power from seismic or external flooding. The low likelihood of the seismic or external flood event occurring, combined with the short time the deficiency existed, resulted in a finding of very low safety significance (Green). The finding does not have a cross-cutting aspect since the performance deficiency is not indicative of current plant performance. Engineering evaluation was performed on July 7, 2004.

Inspection Report# : [2013003](#) (*pdf*)

Significance:  Dec 31, 2012

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Inadequate Maintenance Procedure for the EDG Jacket Water Pump Wear Ring Tolerances

•Green. A self-revealing Green NCV of Technical Specification (TS) 5.4.1a, Procedures, was identified because the licensee did not have an adequate maintenance procedure to perform work on the emergency diesel generator (EDG) 3 engine-driven jacket water pump (JWP). Specifically, between July 25, 1992 and November 15, 2012, Procedure OCM ENG528, Gould Engine Driven Jacket Water Pump Model 3736, did not provide the correct tolerances for the EDG JWP wear rings, resulting in the JWP seizure. The licensee's corrective actions included replacing the casing wear rings with wear rings with the correct tolerance and revising Procedure OCM-ENG528. The licensee entered this issue into the corrective action program (CAP) as nuclear condition report (NCR) 572546.

The performance deficiency associated with this finding was the failure of the licensee to have an adequate procedure for maintenance on the EDG 3 engine-driven JWP. The finding was more than minor because it was associated with the procedure quality attribute of the Mitigating Systems Cornerstone and affects the cornerstone objective of ensuring the availability and reliability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the inadequate procedure resulted in reduced availability of EDG 3 to repair the engine-driven JWP and reduced reliability of the jacket water system during operation. Using IMC 0609, Appendix A, issued June 19, 2012, The Significance Determination Process (SDP) for Findings At-Power, the inspectors determined the finding was of very low safety significance because the finding did not affect the design or qualification of a mitigating structure, system and component (SSC), the finding did not represent a loss of system and/or function, the finding did not represent an actual loss of a function of a single train for greater than the TS allowed outage time, the finding did not represent an actual loss of a function of one or more non-TS trains of equipment, and did not screen as potentially risk-significant due to a seismic, flooding, or severe weather initiating event. The finding does not have a cross-cutting aspect since the performance deficiency is not indicative of current plant performance. Procedure OCM-ENG528 included the incorrect tolerances since July 25, 1992. (Section 1R19)

Inspection Report# : [2012005](#) (*pdf*)

Significance:  Dec 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Design of EDG 2 ASSD Switch A1

•Green. The inspectors identified a Green NCV of 10 CFR 50 Appendix B, Criterion III, Design Control, for failure to assure that the design basis for EDG 2 Alternate Safe Shutdown (ASSD) Switch A1 was correctly translated into specifications and drawings. Specifically, between original EDG 2 installation and September 1, 2012, a wiring discrepancy existed associated with EDG 2 ASSD Switch A1 which resulted in an induced fault that could have impacted the ability to locally control EDG 2 during certain fire scenarios. The licensee's corrective actions included

correcting the EDG 2 control circuit wiring to ensure it was in accordance with the existing approved design and returning EDG 2 to operable status. The licensee entered this issue into the CAP as NCR 557897.

The performance deficiency associated with this finding was the failure to assure that the design basis for EDG 2 ASSD Switch A1 was correctly translated into specifications and drawings. The finding was more than minor because it was associated with the protection against external factors (i.e. fire) attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective to ensure the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, an induced fault could have impacted the ability to locally control EDG 2 during certain fire scenarios. Using IMC 0609, Attachment 4, issued June 19, 2012, Initial Characterization of Findings, and IMC 0609, Appendix F, Attachment 1, Part 1: Application of Fire Protection SDP Phase 1 Worksheet, the results of this evaluation required further significance evaluation. A phase 3 analysis was performed by a regional SRA in accordance with NRC IMC 0609 Appendix F. The finding affected the capability to achieve alternate safe shutdown for Unit 1. The result of the analysis was an increase in core damage frequency of $<1E-6$ /year a GREEN finding of very low safety significance. The finding does not have a cross-cutting aspect since the performance deficiency is not indicative of current plant performance. The EDG 2 ASSD Switch A1 wiring discrepancy has existed since original EDG installation. (Section 40A3)

Inspection Report# : [2012005](#) (pdf)

Barrier Integrity

Significance:  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Work Order to Perform a Modification to the Control Room Emergency Ventilation System

An NRC-identified Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, was identified, for the licensee's failure to have an adequate instruction or procedure to perform a modification to the control room emergency ventilation system. The licensee took immediate action to return CREV to service and entered this issue into the CAP as NCR 578363.

The inspectors determined that the failure of the licensee to have an adequate procedure for installing a jumper on the 2A CREV system was a performance deficiency. The finding was more than minor because it was associated with the configuration control attribute of the Barrier Integrity Cornerstone and affects the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. Specifically, the failure to have an adequate procedure to install a jumper on the 2A CREV system resulted in the safety system functional failure of CREV. Using IMC 0609, Appendix A, issued June 19, 2012, the SDP for Findings At-Power, the inspectors determined the finding screened to a detailed risk evaluation because the finding represented a degradation of the radiological barrier function and smoke or toxic atmosphere function of the control room barrier. The regional SRA performed a Phase 3 analysis on the finding. A screening calculation was performed to estimate the impact the finding would have on the facility for conditions that would lead to plant shutdown, or failure of the filtering function of the ventilation system. The low likelihood of failure to recover the system, combined with the short time the deficiency existed, resulted in a finding of very low safety significance (Green). The finding has a cross-cutting aspect in the area of human performance associated with the work control attribute because the licensee did not appropriately coordinate work activities by incorporating the impact of changes to the work scope or activity on the plant when installing a ring lug jumper on the 2A CREV subsystem. H.3(b)

Inspection Report# : [2013003](#) (pdf)

Significance: G Sep 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Maintain Secondary Containment Operable During an OPDRV Activity

The inspectors identified a Green non-cited violation (NCV) of TS 3.6.4.1, Secondary Containment because the licensee did not maintain secondary containment operable as required during a maintenance activity considered an operation with a potential for draining the reactor vessel (OPDRV). Once questioned by the inspectors, the licensee restored secondary containment, developed an Operation standing instruction 12-052 to treat the activity as an OPDRV and placed this issue into its corrective action program (CAP) as AR 562188.

The failure to maintain secondary containment operable while Unit 1 was in Mode 4 with an OPDRV in progress was a performance deficiency. The finding was more than minor because it was associated with the configuration control attribute of the Barrier Integrity Cornerstone, and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events because the Unit 1 secondary containment boundary was not preserved or maintained. The inspectors evaluated the finding using Inspection Manual Chapter (IMC) 0609, Attachment 4, Phase 1 - Initial Screening and Characterization of Findings, which required an analysis using IMC 0609 Appendix G since the reactor was in Mode 4 (cold shutdown). The finding was determined to be of very low safety significance (Green) according to IMC 0609 Appendix G, Attachment 1, Checklist 6, since a quantitative assessment (Phase 2 or Phase 3 evaluation) was not required. Specifically, the inspectors determined that the licensee maintained adequate mitigation capability for reactor vessel water level inventory and an event did not occur that could be characterized as a loss of control. The cause of this finding was directly related to the cross-cutting aspect of Accurate Procedures in the Resources component of the Human Performance area, because the licensee did not consider the recirculation pump seal replacement activity to be OPDRV based on procedural guidance that contains exclusions to what are considered OPDRV activities. [H.2(c)]

Inspection Report# : [2012004](#) (*pdf*)

Emergency Preparedness

Significance: G Sep 30, 2012

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Failure to Maintain Reliability and Availability of Emergency Response Equipment for Emergency Response Facilities

A self-revealing Green NCV of 10 CFR 50.54(q)(2) was identified for the licensee's failure to properly evaluate or consider the impact to emergency response facilities of design change ESR98-00436 which was implemented in 1999. This resulted in the loss of Emergency Response Facility Information System (ERFIS), Emergency Response Data System (ERDS), Safety Parameter Display System (SPDS), and all displays including radiation monitors for the emergency response facilities. Specifically, the licensee failed to ensure that adequate emergency response facilities and equipment were available as required by the Brunswick Nuclear Plant Radiological Emergency Plan, Section 1.3.1.3 revision 80 and 10 CFR 50.47(b)(8). This issue was captured in the licensee's CAP as AR 542704.

The licensee's failure to properly evaluate or consider the impact to emergency response facilities of design change ESR98-00436 which was implemented in 1999 was a performance deficiency. Specifically, the licensee introduced a single point failure mode which did not meet the design requirements specified in their Design Basis Document (DBD 60) sections 3.6.7.2 and 3.6.7.3. This resulted in the licensee's failure to ensure that adequate emergency response

facilities and equipment were available as delineated in the Updated Final Safety Analysis Report (UFSAR) Section 7.7.1.9, and required by the Brunswick Nuclear Plant Radiological Emergency Plan, Section 1.3.1.3, revision 80, and 10 CFR 50.47(b)(8). The finding was more than minor because it adversely affected the Emergency Preparedness Cornerstone objective of ensuring that the licensee was capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. Specifically, the Facilities and Equipment attribute was affected during the time when the ERFIS, ERDS, SPDS, and all displays including radiation monitors for the emergency response facilities were degraded, and as a result did not meet 10 CFR 50.47(b)(8) Planning Standard program element, adequate emergency facilities and equipment to support the emergency response are provided and maintained. The finding was assessed for significance in accordance with NRC IMC 0609, Appendix B Emergency Preparedness Significance Determination Process. Attachment 2 of Appendix B, Failure to Comply Significance Logic is as follows: Failure to comply; Loss of Risk Significant Planning Standard Function (RSPS), No; RSPS Degraded Function, No; Loss of Planning Standard Function, No; the result is a Green finding. The inspectors determined that this resulted in a very low safety significance finding (Green). No cross-cutting aspect was assigned to this finding because the performance deficiency occurred more than three years ago and is not reflective of current plant performance.

Inspection Report# : [2012004](#) (*pdf*)

Occupational Radiation Safety

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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