

## Browns Ferry 3 3Q/2015 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:** G Mar 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Failure to provide Adequate Acceptance Criteria for ECCS Venting Surveillance**

Green. An NRC identified non-cited violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” was identified for the licensee's failure to maintain adequate procedure acceptance criteria and cautions to verify operability of the HPCI system in accordance with Technical Specification Surveillance procedure SR 3.5.1.1. As immediate corrective action the licensee performed a prompt operability determination to verify the system remained operable, and plans to make changes to the TS surveillance procedure using the corrective action program. This violation was entered into the licensee’s corrective action program as PER 989728.

The performance deficiency was more than minor because, if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically the operability and availability of the HPCI system could be challenged by having procedural guidance which allows acceptable test results when the limiting void conditions may not be met. The finding was associated with the Mitigating Systems cornerstone. Using NRC Inspection Manual 0609, Appendix A, the finding screened as green because it did not represent an actual loss of function of at least a single train for greater than its technical specification allowed outage time, and did not represent an actual loss of function of one or more non-technical specification trains of equipment designated as high safety-significant in accordance with the licensee’s maintenance rule program for greater than 24 hours. This finding has a crosscutting aspect in the area of Human Performance because the licensee did not challenge the unknown when, both, establishing the venting procedure acceptance criteria and when observing significant bubbles during the venting procedure. [H.11]. (1R04.2) Inspection Report# : [2015001](#) (*pdf*)

**Significance:** G Dec 31, 2014

Identified By: NRC

Item Type: FIN Finding

#### **Failure to Perform Required Continued Monitoring of a Degraded Condition**

. The NRC identified a finding (FIN) associated with the licensee’s failure to evaluate continued operation for an established and growing crack in the “A” Residual Heat Removal Service Water (RHRSW) pump room floor. The licensee failed to provide justification why continued monitoring was not required while the floor crack continued to degrade for over five weeks. This was a requirement per licensee procedure NEDP-22 Operability Determinations and Functional Evaluations, Section 3.2.2.G.4.a.(2).

This finding was more than minor because, if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, without sufficient monitoring, the crack had the potential to propagate until the pumps in the RHRSW pump room became inoperable in a PMF event without the licensee’s knowledge. This finding is associated

with the mitigating systems cornerstone. The finding was screened using Inspection Manual Chapter (IMC) 0609 Appendix A, Exhibit 2, issued June 19, 2012 and was determined to be green because the functions provided by the floor were maintained. The licensee's immediate corrective action was to commence bi-weekly monitoring of the crack until repairs could be made. The cause of this finding was directly related to the cross cutting aspect of the Evaluation attribute of the Problem Identification and Resolution area because the licensee action to address the cause and extent of condition of the crack did not address the safety aspect of crack propagation. [P.2]

Inspection Report# : [2014005](#) (*pdf*)

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## Barrier Integrity

**Significance:**  Mar 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

### Failure to Satisfy TS LCO 3.6.1.3

Green. An NRC identified NCV of Technical Specification Limiting Condition of Operation (TS LCO) 3.6.1.3 was identified for the licensee's failure to satisfy the TS LCO. Specifically, the licensee failed to satisfy the LCO in two instances because two traversing incore probe (TIP) primary containment isolation valves (PCIVs) were inoperable for a duration that exceeded the Technical Specification (TS) Completion Time before the condition was corrected and discovered. Because the valves were operable upon discovery, no immediate corrective action was necessary. The violation was entered into the licensee's corrective action program as PER 1008300.

The performance deficiency was more than minor because it was associated with the SSC & Barrier Performance attribute of the Barrier Integrity cornerstone and adversely affected the cornerstone objective to provide reasonable assurance that the physical design barrier of containment protects the public from radionuclide releases caused by accidents or events. Because PCIVs 3-FCV-94-504 and 3-FCV-94-505 were inoperable and resulted in the failure to satisfy TS LCO 3.6.1.3, reasonable assurance of the integrity of the containment design barrier was adversely affected. The inspectors determined the finding was Green because the TIP lines are a part of a closed system which would not generally contribute to Large Early Release Frequency (LERF). The inspectors determined that the finding had a cross-cutting aspect in the Problem Identification and Resolution area of Identification [P.1], because individuals did not completely, accurately, and in a timely manner identify that the malfunction of the TIP drive mechanisms impacted PCIV operability. (Section 1R15.2)

Inspection Report# : [2015001](#) (*pdf*)

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## Emergency Preparedness

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## Occupational Radiation Safety

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## Public Radiation Safety

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## 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

**Significance:**  Mar 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to Reflect Changes to Facility and Procedures in Final Safety Analysis Report Periodic Revisions**

Severity Level IV. An NRC identified non-cited violation (NCV) of 10 CFR 50.71(e)(4) was identified for the licensee's failure to reflect all changes made in the facility or procedures as described in the Final Safety Analysis Report (FSAR) up to a maximum of six months prior to the date of filing the periodic updates to the FSAR with the NRC. The licensee's immediate corrective action was to enter this issue into their CAP as PER 1008424 to update areas in the FSAR identified by the NRC.

The inspectors determined that traditional enforcement per NRC Enforcement Policy was applicable since this finding reflects an impact on the regulatory process in the form of timely and accurate reports to the NRC. Section 6.1.d.3 of the enforcement policy states, in part, that a failure to update the FSAR as required by 10 CFR 50.71(e) in cases where the information is not used to make an unacceptable change to the facility or procedures is a SL IV violation. The inspectors did not identify any occurrence where the lack of timely updates to the UFSAR resulted in an unacceptable change to the facility or procedures. Crosscutting aspects are not assigned for traditional enforcement violations. (Section 1R18)

Inspection Report# : [2015001](#) (*pdf*)

**Significance:**  Mar 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to Report Condition Prohibited by Technical Specifications**

Severity Level IV. An NRC identified non-cited violation (NCV) of 10 CFR 50.73(a)(2)(i)(B) was identified for the licensee's failure to report, within 60 days of discovery, a condition which was prohibited by the plant's Technical Specifications (TS). Specifically, the licensee failed to notify the NRC that in two instances a traversing incore probe (TIP) primary containment isolation valve (PCIV) was inoperable for a duration that exceeded the Technical Specification (TS) Completion Time. As an immediate corrective action, the licensee entered the issue into its CAP as PER 1008300 and plans to submit an LER.

The licensee's failure to provide a written event report is a traditional enforcement violation because it impacts the NRC's ability to carry out its regulatory function. The traditional enforcement violation was determined to be Severity Level IV because it matched example 6.9.d.9 of the NRC Enforcement Policy. Because the violation is a traditional enforcement violation, no cross-cutting aspect was assigned. (Section 4OA2)

Inspection Report# : [2015001](#) (*pdf*)

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