

Browns Ferry 3 4Q/2015 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Dec 18, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to develop a PM schedule that specified inspection of the EDG neutral grounding resistor

A NRC-identified non-cited violation (NCV) of Technical Specifications (TS)

5.4.1 was identified for the failure to develop a preventive maintenance (PM) schedule that specified inspection of the Emergency Diesel Generators (EDG) neutral grounding resistor as recommended by Regulatory Guide (RG) 1.33, 9.b. Specifically, procedures failed to provide proper guidance to maintain the grounding resistor in accordance with design basis as described in the UFSAR and electrical calculations. Upon identification of the issue, the licensee performed a visual inspection of the resistor and determined that it was functional based on no signs of physical degradation or damage. The licensee entered this issue into the corrective action program (CAP) as CR1114779 to evaluate and implement appropriate corrective actions.

This performance deficiency was more than minor because if left uncorrected it could result in a more significant safety concern. Specifically, lack of inspections of the secondary grounding resistor could allow for an undetected condition which would cause transient voltages capable of damaging safety related equipment. The finding was screened for significance using the Mitigating Systems cornerstone column of IMC 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," dated June 19, 2012, and was determined to be of very low safety significance (Green) using IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated June 19, 2012, because the finding affected the design or qualification of a Mitigating SSC, and the SSC maintained its operability as documented in CR 1114779. No cross-cutting was assigned because it is not indicative of current licensee performance.

Inspection Report# : [2015007](#) (*pdf*)

Significance: G Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Promptly Identify a Condition Adverse to Quality Associated with HPCI Turbine Exhaust System

Green. An NRC identified NCV of 10 CFR Part 50, Appendix B, Criterion XVI was identified for the licensee's failure to establish measures to promptly identify a condition adverse to quality involving the malfunction of the High Pressure Coolant Injection (HPCI) turbine exhaust system. Upon discovery of the malfunction, the licensee took

action to determine that HPCI remained operable despite the degraded and nonconforming condition. The licensee is developing corrective actions to resolve the degraded and nonconforming condition. The licensee entered the violation into the licensee's corrective action program as CR 1098320.

The performance deficiency was more-than-minor because it was associated with the Equipment Performance attribute of the Mitigating Systems cornerstone and it 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 performance deficiency resulted in the HPCI system being operated with an unidentified degraded/non-conforming condition which degraded the system capability and challenged system operability. The inspectors determined the finding was Green because the finding was a deficiency affecting the qualification of HPCI, but based on the licensee's evaluations, operability was maintained. The inspectors determined that the finding had a cross-cutting aspect in the Problem Identification and Resolution area of Evaluation [P.2], because the licensee did not thoroughly evaluate an abnormal system condition to ensure that resolutions addressed causes commensurate with their safety significance.

Inspection Report# : [2015003](#) (*pdf*)

Significance:  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*)

Barrier Integrity

Significance:  Dec 18, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Specify Adequate Instrument Ranges for MSIV Leakage Testing

A NRC identified NCV of 10 Code of Federal Regulations (CFR) Part 50, Appendix B, Criterion XI, "Test Control," was identified for the failure to specify adequate test instrumentation for performing MSIV leak rate testing. Specifically, the licensee test procedure allowed the use of high range test instruments to measure low leakage rates while performing the combined leak rate testing on the Unit 1 B Main Steam Line. This resulted in instrument uncertainties large enough to impact the validity of the test results. The licensee immediately entered this issue into their corrective action program as CR 1117381. The licensee performed an evaluation and determined that the latest test results provided reasonable assurance of operability.

This performance deficiency was more than minor because if left uncorrected had the potential to lead to a more significant safety concern by masking the failure to meet test acceptance criteria. The finding was screened for significance using the Barrier Integrity cornerstone column of IMC 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," dated 7/1/2012, and IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated 7/1/2012, and was determined to be of very low safety significance (Green) because the finding did not represent an actual open pathway in the physical integrity of reactor containment. This finding was assigned a cross-cutting aspect in the area of Problem Identification and Resolution because the licensee did not initiate a corrective action to identify the cause of the negative leak rate results obtained during the recent performance of the test procedure (P.1).

Inspection Report# : [2015007](#) (*pdf*)

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*)

Emergency Preparedness

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

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 40A2)

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

Last modified : March 01, 2016