

Summer 4Q/2015 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Assess and Manage Risk Associated with Emergent Work

The inspectors identified a non-cited violation of 10 CFR 50.65 (a)(4) which requires in part that the licensee assess and manage the increase in risk that may result from proposed maintenance activities. Specifically, the licensee failed to assess and manage the increase in risk for emergent work on the 'B' train service water (SW) pump motor breaker. The licensee entered the problem into their corrective action program as condition report (CR) 15-03194.

The inspectors identified a performance deficiency (PD) for the failure to assess and manage the increase in risk for work activities associated the 'B' SW pump motor breaker in accordance with 10 CFR 50.65 (a)(4). The inspectors reviewed IMC0612, Appendix B, "Issue Screening," dated September 7, 2012, and determined the PD was more than minor because it adversely impacted the mitigating systems cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences, and the related attribute of equipment performance involving availability and reliability. Specifically, the failure to identify increases in operational risk and implement risk management actions adversely affected the availability and reliability of those systems relied upon to respond to plant events. The inspectors used IMC 0609, Appendix K, "Maintenance Risk Assessment and Risk Management Significance Determination Process," dated May 19, 2005, and determined the finding was of very low safety significance or Green, because the Incremental Core Damage Probability Deficit for the timeframe the 'B' SW pump was unavailable was less than 1E-6. The inspectors reviewed IMC 0310, "Aspects Within Cross Cutting Areas," dated December 4, 2014, and determined the cause of this finding involved the cross-cutting area of human performance and the aspect of work management, H.5, because the licensee failed to assess and manage the risk commensurate with the emergent work involving the 'B' SW pump motor. (Section 1R13)

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

Significance:  Jun 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Maintain Fire Door/Steam Propagation Barrier in Accordance With the Fire Protection Program Procedure

The inspectors identified a non-cited violation of Technical Specifications (TS) 6.8.1.f, Fire Protection Program (FPP) procedures, which involved a failure to comply with the requirements of FPP-025, "Fire Containment," Revision (Rev.) 4H, for maintaining the operability of a fire door and steam propagation barrier (SPB), DRAB/319. The licensee entered the problem into their corrective action program as condition report (CR) 15-00662.

The inspectors identified a performance deficiency (PD) for the failure to maintain the fire door and SPB operable per the requirements of FPP-025. The inspectors reviewed inspector manual chapter (IMC) 0612, Appendix B, Issue Screening, dated September 7, 2012, and determined the PD was more than minor because it impacted the mitigating systems cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences, and the related attribute of protection against external factors such as fire. In regards to the fire confinement function of DRAB/319, the inspectors used IMC 0609, "Significant Determination Process," Appendix F, Fire Protection Significance Determination Process, dated September 20, 2013, and performed a Phase 1 analysis to determine the finding was of very low significance or Green. The fire confinement program element was not of low degradation, the non-suppression probability was 0.1, the fire frequencies related to the affected fire zones AB01.10 and FH01.01 were $3.31E-3$ and $8.69E-5$ respectfully, and the duration of the component inoperability was approximately 12 hours or 0.00137, which resulted in screening check frequency of $4.65E-7$ that was less than the screening criteria of $1E-6$. Additionally, the inspectors noted minimal fixed combustibles and ignition sources in the near vicinity of both sides of DRAB/319, and the fire detection instrumentation in both affected fire zones remained operable allowing an operator response in the event of a fire. In regards to the SPB function of DRAB/219, the inspectors used IMC 0609, Appendix A, SDP for Findings at-Power, dated June 19, 2012, and determined the finding was also of very low safety significance, or Green, because it was not a design deficiency or loss of system function impacting TS. The resulting increase of humidity above equipment qualification test limits of one train of reactor vessel level instrumentation system transmitters would likely not have resulted in a loss of function. The inspectors reviewed IMC 0310, Aspects Within Cross Cutting Areas, dated December 4, 2014, and determined the cause of this finding involved the cross-cutting area of human performance and the aspect of resources, H.1, because the licensee failed to ensure that the fire door closure mechanism was adequate to close the door for the protection of equipment important to safety. (Section 1R15)

Inspection Report# : [2015002](#) (pdf)

Barrier Integrity

Significance:  Dec 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Accomplish Procedure for Diagnostic Testing Resulting in Valve Failures (Section 40A2.2)

The inspectors identified a non-cited violation of 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, which requires in part that activities affecting quality shall be accomplished in accordance with procedures. Specifically, the licensee failed to accomplish preventative maintenance diagnostic testing in accordance with their station administrative program procedure, SAP-160, "Motor Operated Valve Program," Revision 1, to identify degradation of a torque switch that led to two failures of stroke time testing of 'A' train reactor building spray (SP) sump isolation valve, XVG03005A-SP. This also resulted in a loss of safety function involving reactor building spray. The licensee entered the problem into their corrective action program as condition report, CR-15-00541.

The inspectors identified a performance deficiency (PD) for the failure to accomplish the requirements of SAP-160 leading to two failures of XVG03005A-SP. The inspectors reviewed IMC 0612, Appendix B, "Issue Screening," dated September 7, 2012, and determined the PD was more than minor because it adversely impacted the barrier integrity cornerstone objective to provide reasonable assurance that the reactor building or containment protects the public from radionuclide releases caused by accidents or events and the related attribute of structures, systems and components (SSC) performance. Specifically, the licensee failed to perform preventative maintenance diagnostic testing required by SAP-160 to identify degradation of a torque switch for XVG03005A-SP. The inspectors used IMC 0609, Appendix A, Exhibit 3, "Barrier Integrity Screening Questions," dated July 1, 2012, and IMC 0609, Appendix

H, “Containment Integrity Significance Determination Process,” dated May 6, 2004, and determined the finding was of very low safety significance or Green, because the finding did not represent a significant impact to Large Early Release Failure. The inspectors reviewed IMC 0310, “Aspects Within Cross Cutting Areas,” dated December 4, 2014, and determined the cause of this finding involved the cross-cutting area of problem identification and resolution and the aspect of evaluation, P.2, because the licensee failed to thoroughly evaluate the failures of XVG03005A-SP to ensure that resolutions address causes and extent of conditions commensurate with their safety significance. (Section 40A2.2)

Inspection Report# : [2015004](#) (*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

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