

## Summer 1Q/2016 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:** G Mar 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Failure to Implement Adequate Administrative Controls Following a Departure from NFPA 80-1973 and Provide NRC Staff Complete and Accurate Information**

The inspectors identified a Severity Level IV, non-cited violation (NCV) of 10 CFR 50.9(a), “Completeness and accuracy of information,” and an associated Green non-cited violation of V.C. Summer, Operating License Condition 2.C.(18) for a NFPA 80-1973 code deviation that was not discussed in the licensee’s NFPA 805 license amendment request (LAR), and would result in adversely affecting the ability to achieve and maintain safe shutdown in the event of fire because the associated engineering evaluation relied on inadequate administrative controls to ensure the associated replacement doors in the intermediate building, DRIB/105A&B, were kept closed as a basis for not following NFPA 80-1973 which required the fire doors be self-closing. The licensee entered the violations into their corrective action program as condition reports CR-15-04027 and CR-16-00242 respectively.

The inspectors identified a reactor oversight process (ROP) performance deficiency (PD) for the failure to provide adequate administrative controls to allow departure from NFPA 80-1973 requirements, which resulted in replacement of a self-closing fire door with two non-self-closing fire doors, DRIB/105A&B, that adversely affected the ability to achieve and maintain safe shutdown in the event of fire since they were found open on multiple occasions. The inspectors reviewed Inspection Manual Chapter (IMC) 0612, Appendix B, “Issue Screening,” dated September 7, 2012, and determined the ROP 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. The inspectors used IMC 0609, “Significant Determination Process,” Appendix F, “Fire Protection Significance Determination Process,” Attachment 1, dated September 20, 2013, to perform a Phase 1 analysis and determined that the ROP finding was of very low safety significance (Green) based on the response for Question 1.4.3.A in which the combustible loading on both sides of DRIB/105A&B was less than 120,000 BTU/ft<sup>2</sup>. Furthermore, the inspectors determined that the associated fire zone area (IB 7) with multiple equipment trains used a pre-action sprinkler system and automatic fire detection.

The inspectors also determined that the licensee’s failure to include the departure from NFPA 80-1973 in their NFPA 805 license amendment request was a violation of 10 CFR 50.9(a). Because this violation of 10 CFR 50.9(a) had the potential to impact the NRC’s ability to perform its regulatory function, the inspectors evaluated this violation using traditional enforcement (TE). Since the TE violation is associated with a Green ROP violation, and the misinformation was identified after the NRC relied on it for issuing a previous operating license amendment, the TE violation was determined to be a Severity Level IV violation, consistent with the language of the NRC Enforcement Policy, Section 2.3.11, “Inaccurate and Incomplete Information.” The inspectors reviewed IMC 0310, “Aspects Within Cross Cutting Areas,” dated December 14, 2014, and determined the cause of this finding involved the cross-cutting area of problem

identification and resolution, P.3, because the licensee failed to ensure that adequate administrative controls were in place after the fire doors were found open multiple times. (Section 40A5)

Inspection Report# : [2016001](#) (*pdf*)

**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*)

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## Barrier Integrity

**Significance:** G 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

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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.

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## Miscellaneous

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