Harris 1
3Q/2016 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Mar 31, 2016
Identified By: NRC
Item Type: FIN Finding
NRC Biennial Written Examinations Did Not Meet Qualitative Standards
. The inspectors identified a finding of very low safety significance associated with 10 CFR 55.59, "Requalification," based on a determination that greater than 20 percent of the written examination questions administered to licensed operators during the 2014 biennial written examination were flawed. The licensee entered this issue into their Corrective Action Program (CAP) as Action Request (AR) 01940942, Inspection Procedure (IP) 71111.11B NRC Biennial LOCT Inspection Feedback, dated August 6, 2015.

The inspectors determined that the finding was more than minor because it was associated with the Human Performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the finding adversely affected the quality and level of difficulty of biennial written examinations, which potentially impacted the facility's ability to appropriately evaluate licensed operators. The risk importance of this issue was evaluated using IMC 0609, Appendix l, "Licensed Operator Requalification Significance Determination Process (SDP)."

The qualitative standards used by the inspectors were defined in TPP-306, "Licensed Operator Continuing Training Program," and TRN-NGGC-0441, "Licensed Operator Requalification Annual/Biennial Exam Development," and further described within NUREG-1021, Revision 9, ES-602, Attachment 1, "Guidelines for Developing Open-Reference Examinations," and Appendix B, "Written Examination Guidelines." Because more than 20 percent, but less than 40 percent, of the questions reviewed were flawed, Blocks 4 and 5 of Appendix I characterized the finding as having very low safety significance (Green). A review of the cross-cutting aspects was performed and no associated cross-cutting aspect was identified.

Inspection Report# : 2016001 *(pdf)*

Significance: G Dec 31, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
'B' ESW System Safety-Related Cables Submerged in Water
A self-revealing Green non-cited violation (NCV) of Criterion III, Design Control, Appendix B of 10 CFR Part 50, occurred due to the licensee's failure to maintain Class 1E (safety-related) electrical cables in an environment for which they are designed. Specifically, the low-voltage safety-related cables associated with the 'B' Essential Service Water (ESW) system were submerged in water, a condition for which they are not qualified. The licensee took

immediate actions to lower the water levels in underground cable vaults where submerged cables were discovered, and conduct pump-downs of the safety-related underground cable vaults on an increased scheduled frequency. The licensee entered this issue into the corrective action program (CAP) as nuclear condition reports (NCRs) 1961933 and1962664, respectively, and implemented actions to pump down the non-conforming vaults.

The licensee's failure to maintain the low-voltage safety-related cables associated with the 'B' ESW system in an environment for which they were designed was a performance deficiency. The performance deficiency was more than minor because the cables known to be submerged are part of the 'B' ESW system, which is a mitigating system and is associated with the Mitigating Systems Cornerstone. The performance deficiency was related to the equipment reliability attribute and failure to maintain the cables in the environment for which they were designed adversely impacted the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the submergence of the safety-related cables adversely impacted the service life of the cables and could cause the 'B' ESW system to be inoperable in the event a cable failed as a result of continuous submergence. The inspectors used Table 2 of Attachment 4, Initial Characterization of Findings, of Inspection Manual Chapter (IMC) 0609, Significance Determination Process (SDP), to determine that the finding was associated with the Mitigating Systems Cornerstone. Using the guidance provided in Table 3 of Attachment 4, the inspectors transitioned to Appendix A, SDP for Findings At-Power, of IMC 0609. The inspectors used Exhibit 2, Mitigating Systems Screening Questions, of the appendix, to determine that the finding was of very low safety significance (Green) because the finding did not represent an actual loss of function on the ESW system. The finding was assigned the cross-cutting aspect of work management, as described in the area of human performance, because the licensee failed to implement an adequate preventive maintenance program to monitor and maintain the sump pumping system associated with the safety-related cable vaults (H.5).
Inspection Report# : 2015004 *(pdf)*

Significance: G Dec 31, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Adequately Implement Post-Maintenance Testing
A self-revealing Green NCV of Criterion XI, Test Control, Appendix B of 10 CFR Part 50, occurred due to the licensee's failure to perform adequate post-maintenance testing on the essential services chilled water (ESCW) chillers. Specifically, on multiple occasions the licensee failed to perform section 7.8, Current Signal Input Resistor Adjustment, of procedure CM-I0014, York Essential Services Chilled Water Chiller Temperature Control Maintenance, following maintenance on the temperature controller associated with the ESCW chillers. The licensee took corrective actions to adjust the current limiters on the ESCW chillers to be at the correct setting of 65 amps. The licensee entered this issue into the CAP as NCRs 1944657 and 1950574.

The licensee's failure to perform adequate post-maintenance testing on the, ESCW Chiller was a performance deficiency. Specifically, the failure to perform section 7.8 of procedure CM-I0014 to ensure the configuration of the temperature controllers were per design specifications resulted in the current limiters on each unit being out of calibration for extended periods of time. The performance deficiency was more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. For the 'A' train, continued omission of section 7.8 following maintenance on its temperature controller, had the potential of the pre-rotation vanes pulling excessive load resulting in a trip of the 'A' train chiller. For the 'B' train, continued omission of section 7.8 following maintenance on its temperature controller had the potential of the pre-rotation vanes not picking up adequate load to meet the cooling demands during accident conditions. The inspectors used Table 2 of Attachment 4, Initial Characterization of Findings, of IMC 0609, Significance Determination Process, to determine that the finding was associated with the Mitigating Systems Cornerstone. Using the guidance provided in Table 3 of Attachment 4, the inspectors transitioned to Appendix A, Significance Determination Process (SDP) for Findings At-Power, of IMC 0609. Using Exhibit 2, Mitigating Systems Screening Questions, of the appendix, the inspectors determined that the finding was of very low safety significance (Green) because while the chillers were in a nonconforming condition,

operability of the chillers was maintained. The finding was assigned the cross-cutting aspect of bases for decisions, as described in the area of human performance, because the licensee made the decision not to perform section 7.8 of maintenance procedure CM-I0014 without documenting a reason for omitting the section following maintenance on the ESCW temperature controllers (H.10).

Inspection Report# : 2015004 *(pdf)*

Significance: G Dec 10, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Establish As-found Testing on 6.9kV Vacuum Breakers
The team identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," for the licensee's failure to establish a periodic as-found testing program of safety-related 6.9kV vacuum breakers in accordance with applicable design document IEEE 308-1971. The licensee entered this issue into their corrective action program as action request 01983086 and initiated a procedure change request to have the procedure changed to verify the as-found capability of the breakers before performing the first scheduled preventative maintenance on the breakers in April 2016.
The performance deficiency was determined to be more than minor because, if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, the failure to establish as-found testing could mask degradation of the circuit breakers and decrease the reliability of the breakers to perform their safety-related function when called upon. The finding was determined to be of very low safety significance (Green), because it was a deficiency affecting the design or qualification of a structure, system, or component, which maintained its operability. The team determined that no finding cross-cutting aspect was applicable because the finding did not reflect current licensee performance.
Inspection Report# : 2015007 *(pdf)*

Barrier Integrity

Emergency Preparedness

Significance: G Oct 01, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Follow EPM-410 Procedure
An NRC-identified Green NCV of 10 CFR 50.54(q)(2) was identified, for the licensee's failure to follow and maintain, in effect, the Emergency Plan when performing monthly testing of the Technical Support Center (TSC). Specifically, the licensee failed to follow procedural steps when recorded values did not meet acceptance criteria as specified in EPM-410, Communication and Facility Performance Tests. The issue was placed in the licensee's corrective action program as CR's 01942073, 01940053.
The finding was more than minor because it was associated with the Emergency Response Organization (ERO) Performance attribute and 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 failure to follow procedural steps when recorded values did not meet acceptance criteria resulted in a failure to comply with emergency plan. The finding was assessed for significance in accordance with NRC Manual Chapter 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; results in a Green finding. The inspectors identified a cross-cutting aspect in the Problem Identification and Resolution area because the licensee did not take effective corrective actions to address issues in a timely manner commensurate with their safety significance (P.3).
Inspection Report# : 2015008 *(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

Significance: G Sep 30, 2016
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Conduct and Document Fatigue Assessments for Contract Personnel
Inspectors identified a Green non-cited violation (NCV) of 10 CFR 26.27, Written Policy and Procedures, for the failure to conduct and document fatigue assessments for self-declared fatigued contractors, and other contract personnel called in to supplement or support emergent firewatch duties, and emergent foul weather and storm-related issues. Specifically, self declared, fatigued workers and other personnel were called in to work and no fatigue assessments were conducted and documented as required by procedure AD-SY-ALL-0460, Revision 0, “Managing Fatigue and Work Hour Limits.” The licensee entered this into the corrective action program (CAP) as nuclear condition report (NCR) 02053832.

The failure to conduct and document fatigue assessments for self-declared fatigued contractors, and other contract personnel called in to supplement or support emergent firewatch duties, and emergent foul weather and storm-related issues was a performance deficiency. The finding was more than minor because if left uncorrected, the performance

deficiency would have the potential to become a more significant safety concern. Specifically, the failure to conduct fatigue assessments on personnel that self-declared fatigue or were called in to perform unscheduled work, could result in performance of work while impaired from fatigue that may affect their abilities to perform safety-related firewatch compensatory duties and support emergent foul weather activities, safely and competently. The inspectors used NRC IMC 0609, Appendix E, Part I, Baseline Security Significance Determination Process, dated October 16, 2015, and it did not meet the criteria for application of the significance screen. Using Figure 6, Access Authorization, the impact area was determined to be the vital area; with Tier II program element 08 02.05(e), of Policy and Procedures, resulting in a total of one point, which is within the significance determination process threshold for a Green finding. The finding had a cross cutting area of Human Performance, with a cross cutting aspect of documentation, because contract supervisors and managers failed to create and maintain complete, accurate and up-to-date documentation related to the FFD program.

Inspection Report# : 2016003 *(pdf)*

Significance: N/A Oct 01, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Untimely 10 CFR 50.73 Notification of an Inoperable CIV
An NRC-identified Severity Level IV violation of 10 CFR 50.73 was identified fort the licensee's failure to provide a written report to the NRC within 60 days after discovery of a condition prohibited by Technical Specification (TS) Limited Condition for Operation (LCO) 3.6.3, "Containment Isolation Valves." The issue was placed in the licensee's corrective action program as CR 01958628.
The inspectors determined that the failure to provide a written report to the NRC within the time limits specified in regulations was a violation 10 CFR 50.73. The violation was evaluated using Section 6.9 of the NRC Enforcement Policy, because the failure to submit a required licensee event report may impact the ability of the NRC to perform its regulatory oversight function. As a result, this violation was evaluated using traditional enforcement. In accordance with Section 6.9.d.9 of the NRC Enforcement Policy, this violation was determined to be a Severity Level IV, non-cited violation. The inspectors determined that a cross-cutting aspect was not applicable because the issue involving untimely reports to the NRC was strictly associated with a traditional enforcement violation.
Inspection Report# : 2015008 *(pdf)*

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