

Harris 1

4Q/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 I, "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*)

Barrier Integrity

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:  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*)

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