

Surry 2

4Q/2016 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Sep 30, 2016

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Identify Non-Functioning Service Water Seismic Support Causes Service Water Pipe Crack

Green. A self-revealing, non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion XVI was identified because the licensee failed to promptly identify a condition adverse to quality associated with the material condition of the “B” Emergency Service Water (ESW) pump diesel cooling water outlet valve, 1-SW-3. Specifically, the “B” ESW pump diesel cooling water outlet piping flange downstream of 1-SW-3 was found cracked on April 7, 2016. While repairing the cracked pipe flange, the licensee discovered that the fasteners on one baseplate for the 1-SW-3 seismic supports were severed by corrosion. A material deficiency with the second 1-SW-3 seismic support was identified by the NRC in August, 2014. The current issue was documented in the licensee’s corrective action program (CAP) as Condition Report (CR) 1033107.

The inspectors determined that failure to identify a condition adverse to quality associated with the material condition of the “B” ESW pump piping was a performance deficiency (PD). Specifically, not having compensatory actions or periodic inspections of the 1-SW-3 support baseplates in place when there was a known material condition that caused these baseplates to become periodically wetted by service water (SW), inhibited the licensee’s ability to detect that the assumptions in the engineering evaluation, which proved that the two supports remained fully qualified for all design basis loading conditions, had become invalid. The inspectors determined that the PD was more than minor because it was associated with the equipment performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using IMC 0609.04, Initial Characterization of Findings, Table 2, dated June 19, 2012, IMC 0609 Appendix A, “Significance Determination Process (SDP) for Findings at-Power,” dated June 19, 2012, and Exhibit 4 of Appendix A, “External Events Screening Questions”, the inspectors determined that a detailed risk evaluation was required because the finding assumed that the safety function of the “B” ESW pump was unavailable and represented a degradation to one train of a system that supports a risk significant system. A Senior Reactor Analyst performed a bounding risk evaluation by using the Surry Standardized Plant Analysis Risk (SPAR) model and failing the “B” ESW pump for a year. The additional risk of the “B” and “C” pumps out simultaneously for a limited exposure time, and the “A” and “B” pumps for a similar limited exposure time were added to the result.

The delta-Core Damage Frequency (CDF) due to the performance deficiency was determined to be 6.3E-8 (Green). This finding has a cross-cutting aspect in the evaluation component of the problem identification and resolution area (P.2), because the organization did not thoroughly evaluate issues to ensure that resolutions address causes and extent of conditions commensurate with their safety significance. Specifically, the license did not institute periodic inspections of the 1-SW-3 supports when conditions were present that could challenge the assumptions of their design basis loading.

Inspection Report# : [2016003](#) (pdf)

Significance: G Mar 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform a 10 CFR 50.59 Evaluation for Blocking Ventilation to Main Steam Valve Houses

An NRC-identified finding of very low safety significance and an associated Severity Level IV NCV of 10 CFR 50.59, “Changes, Tests, and Experiments,” was identified when the licensee failed to perform and maintain a written evaluation to demonstrate that a procedure change did not require a license amendment. Specifically, the licensee implemented a change to procedure 0-OP-ZZ-021, “Severe Weather Preparation,” Revision 12, to allow installation of tarpaulins over the main steam valve house (MSVH) ventilation louvers thereby changing the Updated Final Safety Analysis Report (UFSAR) facility design without maintaining supporting calculations.

The licensee’s failure to perform a 10 CFR 50.59 evaluation was a performance deficiency (PD). The inspectors determined that the PD was more than minor because it was associated with the design control 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 change allowed the ventilation of the MSVH to be blocked and the lack of engineering calculations resulted in a condition where there was a reasonable doubt about the operability of the auxiliary feedwater (AFW) pumps for their required mission time. Using Manual Chapter 0609.04, “Initial Characterization of Findings,” Table 2, dated June 19, 2012; the finding was determined to adversely affect the Mitigating Systems Cornerstone. The inspectors screened the finding using Inspection Manual Chapter (IMC) 0609, Appendix A, “Significance Determination Process (SDP) for Findings at-Power,” dated June 19, 2012, and determined that it screened as Green because the PD did not affect the design or qualification of the AFW system and it did not represent an actual loss of system safety function. Using IMC 0310, “Aspects within the Cross-Cutting Areas,” dated December 4, 2014, the inspectors determined that the finding had a cross-cutting aspect in the procedure adherence component of the human performance area, H.8, because the licensee failed to follow processes, procedures and work instructions for the 50.59 applicability review when changing the severe weather preparation procedure.

Additionally, the failure to perform a 10 CFR 50.59 evaluation was determined to be more-than-minor in accordance with the guidance in the NRC Enforcement Manual for traditional enforcement violations, because the MSVH louvers were actually covered and there was a reasonable likelihood that the lack of MSVH ventilation could affect the operability of the AFW pumps for their required mission time. The failure constitutes a violation of 10 CFR 50.59, which impacts the regulatory process and therefore, was evaluated through the traditional enforcement process. The SDP, which was used to evaluate this performance deficiency, does not specifically consider the impact on the regulatory process. Thus, although related to a common regulatory concern, it is necessary to address both the violation and finding using different processes to correctly reflect both the regulatory importance of the violation and the safety significance of the associated performance deficiency. (Section 1R01)

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

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