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## **Prairie Island 2 – Quarterly Plant Inspection Findings**

### **2Q/2017 – Plant Inspection Findings**

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#### **Initiating Events**

#### **Mitigating Systems**

**Significance:** G Dec 24, 2013

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **FAILURE TO EVALUATE CHANGES TO NRC APPROVED METHODOLOGY**

Severity Level IV/Green. The inspectors identified a Green finding and associated Severity Level IV Violation of 10 CFR 50.59(d)(1), for the licensee's failure to perform a written evaluation which provided the bases for the determination that a change in the NRC-approved Westinghouse methodology referenced in the Updated Safety Analysis Report (USAR) for evaluating the acceptability of reactor pressure vessel internals baffle former bolting distributions did not require a license amendment. This finding was entered into the licensee's CAP as CAP documents 1539487, "Documentation Missing in 50.59 Screening 4443," dated October 26, 2016; 1552331, "BFB Screen Referenced Eval for SER Limitation 4 Non-Existent," dated March 6, 2017; and 1552314, "BFB Screening Lacks Documentation for SER Limitation 3," dated March 6, 2017. The licensee performed an operability determination and determined the baffle bolts were operable. The inspectors reviewed the operability determination and no performance deficiencies were identified in this determination.

The inspectors determined that the licensee's failure to perform a written evaluation, providing the bases for the determination that a change in the NRC-approved Westinghouse methodology for evaluating the acceptability of baffle former bolting distributions did not require a license amendment, was a performance deficiency. This finding was also evaluated using traditional enforcement because it had the potential for impacting the NRC's ability to perform its regulatory function. The performance deficiency was determined to be more-than-minor because it was associated with the Mitigating Systems cornerstone attribute of design control and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, compliance with the NRC-approved methodology of WCAP-15029-P-A ensured the baffle former assembly maintained its structural integrity, avoiding a failure or excessive deflection of the baffle plates, and hence the primary concern of ensuring the emergency core cooling system could continue to perform its design

function of cooling the reactor core. The inspectors determined the finding could be evaluated using the Significance Determination Process (SDP) in accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process for Findings At-Power," dated June 19, 2012, Exhibit 2, "Mitigating Systems Screening Questions," for the Mitigating Systems cornerstone. The finding screened as having very-low safety significance (green) because the emergency core cooling system maintained its operability, specifically with respect to performing its safety function of ensuring adequate core cooling. As such, the finding corresponded to a Severity Level IV Violation in accordance with Example 6.1.d.2 of the NRC Enforcement Policy. The inspectors did not identify a cross cutting aspect because the performance deficiency was from 2013, and hence the issue did not represent current performance.

Inspection Report# : 2017001 (*pdf*)

**Barrier Integrity**  
**Emergency Preparedness**  
**Occupational Radiation Safety**  
**Public Radiation Safety**  
**Security**

The security cornerstone is an important component of the ROP, which includes various security inspection activities the NRC uses to verify licensee compliance with Commission regulations and thus ensure public health and safety. The Commission determined in the staff requirements memorandum (SRM) for SECY-04-0191, "Withholding Sensitive Unclassified Information Concerning Nuclear Power Reactors from Public Disclosure," dated November 9, 2004, that specific information related to findings and performance indicators associated with the security cornerstone will not be publicly available to ensure that security-related information is not provided to a possible adversary. Security inspection report cover letters will be available on the NRC Web site; however, security-related information on the details of inspection finding(s) will not be displayed.

**Miscellaneous**

Current data as of : August 03, 2017

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