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## Seabrook 1 – Quarterly Plant Inspection Findings

### 3Q/2017 – Plant Inspection Findings

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#### Initiating Events

#### Mitigating Systems

**Significance:** G Jul 14, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Failure to Correct Condition Adverse to Fire Protection Associated with Fire Safe Shutdown**

The team identified a Green, non-cited violation of Seabrook Station Unit 1 Facility Operating License Condition 2.F, "Fire Protection," for failure to implement and maintain in effect all provisions of the approved Fire Protection Program. Specifically, although NextEra identified that procedure OS1200.00 did not properly implement a mitigating action for a fire in the Switchgear Room 'A' as prescribed in the Appendix R Safe Shutdown Analysis Report on August 30, 2010 (Action Requests (ARs) 576775 and 1638123), corrective actions were delayed due to higher priority work and were not timely commensurate with the potential safety significance. NextEra entered the issue into the corrective action program as AR 2214834 and planned to reprioritize the preparation and submittal of a license amendment request to resolve the issue.

The issue was determined to be more than minor because it was associated with the Mitigating Systems cornerstone attribute of protection against external factors (fire) and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, by failing to correct the condition in a timely manner, NextEra did not ensure that the associated fire safe shutdown procedure implemented actions to mitigate a fire in the Switchgear Room 'A' as analyzed in the Appendix R Safe Shutdown Report. The team performed a Phase 1 screening in accordance with IMC 0609, Appendix F, "Fire Protection Significance Determination Process." The deficiency affected the post fire safe shutdown category because NextEra's fire response procedures were degraded. The finding was screened to very low safety significance (Green) because it was assigned a low degradation rating because the procedural deficiencies could be compensated by operator experience and system familiarity. This finding was determined to have a cross-cutting aspect in the area of Human Performance, Resources, in that, NextEra did not ensure that personnel, equipment, procedures, and other resources are

available and adequate to support nuclear safety. Specifically, action to submit a license amendment request to support a deviation from the 10 CFR Part 50, Appendix R, III.G.2 requirements for cable separation had been rescheduled five times due to higher priority licensing work [H.1].

Inspection Report# : 2017008 (*pdf*)

**Significance:** G Jul 14, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to Implement Test Program for Appendix R Emergency Lighting Units**

The team identified a Green, non-cited violation of Seabrook License Condition 2.F, "Fire Protection," because NextEra did not implement the fire protection test program to ensure that the emergency lighting units were in conformance with design requirements. Specifically, NextEra did not implement procedure LS0565.31, "8 Hour Emergency Light Inspections," to verify that the Appendix R emergency lighting units would meet the annual inspection requirements, as well as the 3-year preventive maintenance task for battery replacement and the 8-hour capacity test. Additionally, since the 3-year preventive maintenance task was coded incorrectly, there was no process to ensure that the LS0565.31 would be completed going forward. NextEra entered this issue into the corrective action program as AR 2214652. NextEra's planned corrective actions included revising the classification of the emergency lighting unit preventive maintenance task in order to ensure that the task is performed at the appropriate frequency.

The team determined that this issue was more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, failure to conduct the annual inspection requirements and 3-year preventive maintenance activities could result in the emergency lighting units not meeting the 8-hour battery capacity requirement. The team evaluated this finding using Inspection Manual Chapter 0609, "Fire Protection Significance Determination Process." Because safe shutdown conditions could be reached and maintained, this finding screened as having very low safety significance (Green). The team determined this finding had a cross-cutting aspect in the area of Human Performance, Work Management, because the organization did not implement a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. Specifically, the three-year preventive maintenance task to replace the batteries in the emergency lighting units was coded incorrectly in the work management system, which resulted in NextEra not completing the required testing and maintenance on the lighting units to ensure that they would perform their function during safe shutdown operations [H.5].

Inspection Report# : 2017008 (*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 : November 29, 2017

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