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## Davis-Besse – Quarterly Plant Inspection Findings

### 4Q/2017 – Plant Inspection Findings

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#### Initiating Events

#### Mitigating Systems

**Significance:** G May 17, 2017

Identified By: NRC

Item Type: FIN Finding

#### **Failure to Maintain Adequate Room Temperature in the Emergency Feedwater Facility**

A finding of very low safety significance was identified by the inspectors for failing to maintain adequate room temperature in the emergency feedwater facility (EFWF) to support equipment operation. Specifically, the inspectors identified temperatures below freezing in multiple locations on emergency feedwater (EFW) system piping and in the EFWF basement. In response, the licensee installed heaters to raise room temperature.

This finding is not a violation of NRC requirements. The inspectors determined that failing to maintain adequate room temperature in the EFWF to support equipment was contrary to Nuclear Energy Institute (NEI) 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide", Rev. 2 and was a performance deficiency. The finding is of more than minor significance because it was associated with the cornerstone attribute of protection against external factors and adversely affected the mitigating systems cornerstone objective. A detailed risk evaluation (DTE) determined the finding was (Green). This finding was assigned a cross-cutting of "Challenge the Unknown". (H.11) (Section 40A5.1.c.1)

Inspection Report# : 2017008 (*pdf*)

**Significance:** G May 12, 2017

Identified By: NRC

Item Type: VIO Violation

#### **Failure to Establish a Test Program that Demonstrates the Emergency Core Cooling System Room Coolers Will**

### **Perform Satisfactorily in Service**

The inspectors identified a finding of very low safety significance (Green) and an associated Cited Violation of Title 10 of the Code of Federal Regulations, (10 CFR) Part 50, Appendix B, Criterion XI, "Test Control," for the licensee's failure to establish a test program that demonstrates the emergency core cooling system (ECCS) room coolers will perform satisfactorily in service. Specifically, the associated inspection procedures did not include acceptance criteria, and the inspection results were not documented and evaluated to demonstrate the ECCS room coolers' thermal performance was acceptable. The licensee captured this issue in their corrective action program (CAP) as condition report (CR) 2017-03328 to, in part, restore compliance and assess current and past operability.

The performance deficiency was determined to be more than-minor because it was associated with the Mitigating Systems cornerstone attribute of procedure quality and affected the cornerstone objective of ensuring the availability, reliability, and capability of mitigating systems to respond to initiating events to prevent undesirable consequences. Specifically, the failure to demonstrate the ECCS room coolers will perform satisfactorily in service does not ensure the coolers would remain available and capable of performing their mitigating function because it has the potential to allow an unacceptable condition to go undetected. The finding screened as of very-low safety significance (Green) because it did not result in the loss of operability or functionality of mitigating systems. Specifically, the licensee re-evaluated the past operability impact of the 2016 tube blockage discoveries and determined that coolers were operable by crediting actual service water temperature and flowrate conditions. The inspectors determined that the associated finding had a cross-cutting aspect in the area of problem identification and resolution because the licensee did not thoroughly evaluate issues to ensure that resolutions address causes and extent of conditions commensurate with their safety significance. (Section 1R07.b(1)) [P.2]

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**

**Significance:** N/A Nov 14, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Ultrasonic Testing Records To Support Fuel Selection Were Not Being Maintained**

A Severity Level IV NCV of 10 CFR 72.174, "Quality Assurance Records," was identified by the NRC inspectors for the failure of the licensee as of June 22, 2017, to maintain sufficient records to furnish evidence of activities affecting quality. Specifically, the licensee failed to maintain ultrasonic testing (UT) records which were relied upon to

demonstrate that the spent fuel selected for loading in calculation C-NF-062.02-055, Revision 0, was correctly classified as intact. The licensee documented this issue in its CAP as CR-2017-06976 and took timely corrective actions.

The inspectors determined that the violation was of more than minor significance using IMC 0612, "Power Reactor Inspection Reports", Appendix E, "Examples of Minor Issues." Example 9a is applicable to this issue in that the licensee failed to maintain UT records for many fuel assemblies classified as intact for loading, and this failure to maintain records was not an isolated incident of one or two instances. The violation screened as a Severity Level IV NCV. Cross-cutting aspects are not assigned to traditional enforcement violations.

Inspection Report# : 2017003 (*pdf*)

Current data as of : February 01, 2018

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