



Home > Nuclear Reactors > Operating Reactors > Reactor Oversight Process > Plant Summaries > Harris 1 > Quarterly Plant Inspection Findings

Harris 1 – Quarterly Plant Inspection Findings

4Q/2017 – Plant Inspection Findings

On this page:

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness
- Occupational Radiation Safety
- Public Radiation Safety
- Security

Initiating Events

Mitigating Systems

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 07, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Incomplete and Inaccurate Emergency Action Level Submittals

The NRC identified a Severity Level (SL) IV non-cited violation (NCV) of 10 CFR 50.9, "Completeness and accuracy of information," for failure to provide complete and accurate information for prior approval of a new emergency action level (EAL) scheme. The documents submitted to the NRC were, "Shearon Harris Nuclear Power Plant, Unit 1

Changes to the Emergency Action Level Scheme,² dated April 25, 2010, and ³License Amendment Request to Adopt Emergency Action Level Scheme Pursuant to NEI 99-01, Revision 6,⁴ dated April 30, 2015. The submitted documents specified the licensee's EAL scheme for Category F ⁵Fission Product Barrier EAL, which contained declaration EAL threshold values for the containment high range radiation monitor that were lower than the correct values due to use of an improper calculation methodology. The calculation methodology that was used was not in accordance with the license. It was used to calculate the loss of fuel clad barrier and potential loss of containment threshold values. The licensee implemented compensatory corrective actions by issuing Standing Instruction 2017-017 to inform operators and emergency response organization decision-makers of the proper application of the EAL scheme and appropriate threshold values to be implemented. Additionally, the licensee plans to submit a license amendment request to update the EAL scheme. The licensee entered this violation into their corrective action program (CAP) as nuclear condition report (NCR) 02155272.

The inspectors evaluated the underlying technical issue and determined that the licensee's failure to maintain the effectiveness of its emergency plan was a performance deficiency. The issue was documented as a Green licensee-identified violation (LIV) in Section 4OA7 of this report. The reactor oversight process (ROP), significance determination process, does not specifically consider the regulatory process impact in its assessment of licensee performance. Therefore, it was necessary to address this violation which impeded the NRC's ability to regulate, using traditional enforcement to adequately deter non-compliance. Using the NRC Enforcement Policy, Section 2.3.11, ⁶Inaccurate and Incomplete Information,⁷ and Section 6.9, ⁸Inaccurate and Incomplete Information or Failure to Make a Required Report,⁹ this issue was determined to be a SL IV violation. Though the NRC would have questioned the issue with a request for additional information, it would not have resulted in substantial further inquiry. Additionally, the associated technical violation was determined to be of very low safety significance. Traditional enforcement violations are not assessed for cross-cutting aspects.

Inspection Report# : 2017003 (*pdf*)

Current data as of : February 01, 2018

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