

## Browns Ferry 3 1Q/2014 Plant Inspection Findings

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### Initiating Events

**Significance:** G Dec 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to document service water freeze protection deficiencies**

The NRC identified a non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion V, Procedures, for the licensee's failure to implement 0-GOI-200-1, Freeze Protection Inspection. Specifically, the licensee failed to enter freeze protection discrepancies into the corrective action program as part of the Freeze Protection Discrepancy List per 0-GOI-200-1 for the residual heat removal service water (RHRSW) and emergency equipment cooling water (EECW) systems. As a corrective action, the licensee entered the required deficiencies onto the Freeze Protection Discrepancy List. The licensee has entered this issue into their corrective action program as problem evaluation reports 800190 and 821426.

The finding was more than minor because, if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern, in that the intake room piping would continue to be exposed to freezing temperatures without adequate freeze protection which could affect RHRSW and EECW systems' ability to perform their safety functions. The inspectors performed a Phase 1 screening in accordance with IMC 0609, Significance Determination Process, Appendix A, Exhibit 1, Initiating Event screening question E, and determined the finding was of very low safety significance (Green) because it did not impact the frequency of an internal flooding event. The cause of this finding has a cross-cutting aspect in the Work Practices component of the Human Performance area, because the licensee failed to define and effectively communicate expectations regarding procedural compliance and that personnel follow procedures. [H.4(b)] (Section 1R01)

Inspection Report# : [2013005](#) (*pdf*)

**Significance:** G Sep 30, 2013

Identified By: NRC

Item Type: FIN Finding

#### **Failure to properly screen and classify corrective action program, problem evaluation reports**

The NRC identified a Green finding for the licensee's failure to properly screen and classify corrective action program (CAP) problem evaluation reports (PER's) in accordance with NPG-SPP-03.1.4, Corrective Action Program Screening and Oversight. Specifically, the licensee failed to screen service requests (SR's) that had a high potential for resulting in a reactor scram as 'A' level PER's. The licensee entered the issue into the corrective action program as PER 687732.

This finding was determined to be more than minor because, if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern. The finding was associated with the Initiating Events cornerstone and using IMC 0609, Appendix A, At-Power Significance Determination Process screening questions for transient initiators, the finding screened as Green because the finding did not cause a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition. The cause of this finding was directly related to the cross-cutting aspect of thoroughly evaluating problems such that the

resolutions address causes and extent of condition in the corrective action program component of Problem Identification and Resolution. [P.1.c] (Section 40A3.2)

Inspection Report# : [2013004](#) (*pdf*)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate corrective actions to address programmatic procedure quality issue**

The team identified a non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion XVI, “Corrective Actions,” due to BFNs failure to take corrective action to preclude repetition of a significant condition adverse to quality regarding procedure quality. Specifically, BFN self-identified corrective actions implemented to address inadequate procedures but did not identify and address a significant contributor to the inadequate procedures, resulting in several additional plant performance issues. The team identified multiple inadequate procedures across most BFN departments during the inspection document review and onsite inspection. BFN has conducted root causes, developed and implemented numerous corrective actions; however, procedural deficiencies continued to contribute to plant shutdowns, unplanned component unavailability, and rework activities. BFN documented the issue in PERs 680792 739429, and 740212.

This Finding was determined to be more than minor because it associated with the human performance attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit this likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Using Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process for Findings At-Power,” the team determined that the Finding was of very low safety significance because it did not cause a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition (e.g. loss of condenser, loss of feedwater). The team determined that the Finding has a cross-cutting aspect in the area of problem identification and resolution, corrective action program, because BFN did not thoroughly evaluate the extent of condition associated with inadequate procedures such that the corrective actions resolved the issue and prevented repetition. [P.1(c)] (Section 5.3.2.2.2)

Inspection Report# : [2013011](#) (*pdf*)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to establish qualified ultrasonic examination procedures**

The team identified a NCV of 10 CFR 50, Appendix B, Criterion IX, Control of Special Processes for the licensee’s failure to control non-destructive examination (NDE) activities by not having qualified NDE procedures required by applicable codes, standards, specifications, criteria, and other special requirements. Specifically, four Ultrasonic (UT) examination procedures did not contain any of the required American Society of Mechanical Engineers (ASME) Code Section XI, Appendix VIII essential variables or the explicit requirement to perform the UT examinations using applicable Performance Demonstrated Initiative (PDI) procedures. The licensee initiated prompt corrective actions to revise all UT implementing procedures to become qualified in accordance with ASME Code Section XI, Appendix VIII requirements and entered the issue into their corrective action program (PERs 730250 and 721446).

The Finding was more than minor, because it affected the Initiating Event cornerstone and if left uncorrected, could become a more significant safety concern. Absent NRC identification of this PD, the licensee could have continued performance of UT examinations on safety-related components using unqualified procedures. Performance of UT examination using unqualified procedures could lead to safety-related components with unacceptable service-induced

flaws being returned to service without ASME code-specified evaluation or repair. The team determined the Finding was of very low significance because the Finding was not likely to result in exceeding the RCS leak rate for a small loss of coolant accident (LOCA) or cause total loss of function for a LOCA mitigating system. This Finding had a cross-cutting aspect in the area of Problem Identification and Resolution, Operating Experience (OE) because the licensee did not implement and institutionalize OE pertaining to UT examination procedure issues through changes to station processes, procedures, and training programs to support plant safety. [P.2 (b)] (Section 6.1.6.2.1)

Inspection Report# : [2013011](#) (*pdf*)

## Mitigating Systems

**Significance:**  Mar 31, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to control transient combustible in designated high risk areas**

An NRC-identified non-cited violation (NCV) of the T.S. 5.4.1.d, Fire Protection Program Implementation, was identified for the licensee's failure to control transient combustible materials in designated high risk areas in Unit 1 and Unit 3. The licensee's corrective action was to remove the combustible materials. The licensee entered this issue into their corrective action program as PER 845630 and 846184.

The performance deficiency was determined to be more than minor, because it was associated with the Protection Against External Factors attribute (Fires) 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. Specifically, leaving unanalyzed transient combustibles in proximity to safety related equipment could affect the equipment's ability to perform its safety function during a credible fire scenario. The finding was characterized according to IMC 0609, Significance Determination Process (SDP), Appendix F, Attachment 1, Fire Protection SDP Phase 1 Worksheet dated September 24, 2013. This issue screened as low safety significance (Green), per Attachment 1 question 1.3 because it did not affect the ability of the reactor to reach and maintain safe shutdown. The cause of this finding was directly related to the Human Performance cross cutting aspect of Change Management. Plant leaders did not use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority. Specifically, the impact of the new procedures for transient combustible controls did not apply change management controls such as site wide communication and training to make workers aware of the new requirements. [H.3] (Section 4OA2)

Inspection Report# : [2014002](#) (*pdf*)

**Significance:**  Dec 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to maintain emergency diesel room floor drains**

The NRC-identified a non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion III, Design Control, for the licensee's failure to establish measures to ensure the EDG floor drains maintained the capability of performing their intended function as described their design basis. The licensee's immediate corrective action was to clean all the drains in all the EDG rooms. The licensee has entered this issue into their corrective action program as problem evaluation report 765575.

The finding was more than minor because, if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern, in that, the EDG room floor drains could become sufficiently clogged such that internal flooding would cause the affected EDG to be unable to perform its safety function. The inspectors performed a Phase 1 screening in accordance with IMC 0609, Significance Determination Process, Appendix A, Exhibit 1, Initiating Event screening question E, and determined the finding was of very low safety significance (Green) because it did not impact the frequency of an internal flooding event. This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program Component, because TVA did not identify floor drain issues completely, accurately, and in a timely manner commensurate with their safety significance. [P.1 (a)] (Section 4OA2.3)

Inspection Report# : [2013005](#) (pdf)

**Significance:** G Nov 08, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate compensatory actions to minimize the effects of impaired fire protection equipment on fire safe shutdown**

The inspectors identified a Green non-cited violation (NCV) of Browns Ferry Nuclear Plant (BFN) Unit Nos. 1, 2, and 3 Technical Specification 5.4.1.d for the failure to establish procedural guidance to implement compensatory measures for the high pressure fire protection (HPFP) system in support of the Fire Protection Report (FPR) and Safe Shutdown Instructions (SSI). The licensee entered this condition in their corrective action program (CAP) as problem evaluation report (PER) 812090 and issued an operations' Standing Order which supplemented existing fire watch patrol compensatory measures in Fire Area (FA) 25-1. The licensee's failure to establish appropriate compensatory measures supporting the FPR and the SSI to ensure an adequate water supply remained available when the diesel driven fire pump was taken out of service was a performance deficiency. The performance deficiency was more-than-minor because it was associated with the protection against external events (fire) attribute of the Mitigating Systems Cornerstone and that it adversely affected the cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. The finding was screened in accordance with NRC IMC 0609, "Significance Determination Process", dated June 2, 2011, Attachment 4 "Initial Characterization of Findings". This screening determined that an IMC 0609, Appendix F "Fire Protection Significance Determination Process" was required because it affected fixed fire protection systems. Attachment 1, Step 1.4.2, "Fixed Fire Protection Systems" screened the finding to very low safety significance (Green) since the impact of a fire in FA 25-1 is limited to no more than one train/division important to safety and that the reactor would be able to reach and maintain safe shutdown condition. The inspectors determined that no cross cutting aspect was applicable to this performance deficiency this finding because the operability requirements and compensatory actions in effect had been developed in the past (1988) and were not indicative of current licensee performance.. (Section R10.10)

Inspection Report# : [2013010](#) (pdf)

**Significance:** G Nov 08, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate evaluation of combustible material control fire protection program change**

The inspectors identified a Severity Level IV, non-cited violation (NCV) of Browns Ferry Nuclear Plant (BFN) Renewed Facility Operating License Conditions 2.C.(13), (14), and (7) for Units 1, 2, and 3, respectively, and an associated finding of very low safety significance (Green) for the failure to perform an evaluation of the impact of a change to the Fire Protection Report on the fire protection license conditions, as directed by the licensee's procedure, FPDP-3, Management of the Fire Protection Report, Revision 3. The failure to adequately evaluate the impact of the change, which permitted the use of fire retardant treated wood materials as transient fire loads in safety related plant

areas without further approval, resulted in the implementation of a change to the Fire Protection Program (FPP) that could have adversely affected the ability to achieve and maintain safe shutdown. The licensee also failed to submit the FPP change to the NRC for review and approval prior to implementation which impacted the ability of the NRC to perform its regulatory oversight function. The licensee entered the issue into their corrective action program (CAP) as problem evaluation report PER 812091 and issued an operations' Fire Protection Section Instruction Letter to require all wood products to be evaluated when left unattended in any plant fire area. The inspectors determined that this finding was more than minor because if left uncorrected, could become a more significant safety concern. Specifically, if the licensee does not limit transient fire loads (including fire retardant treated wood) to below the capability of suppression systems or fire barrier ratings for a specific fire area as evaluated by the station's fire hazard analysis, a fire could spread to other fire areas and affect the ability to achieve and maintain safe shutdown in the event of a fire. The finding was evaluated using IMC 0609, Attachment 4, "Initial Characterization of Findings," issued June 19, 2012, for Mitigating Systems, and IMC 0609, Appendix F, "Fire Protection Significance determination Process," issued September 20, 2013, and the inspectors determined the finding was of very low safety significance (Green) because the reactor would have been able to reach and maintain safe shutdown conditions under actual fire loading conditions. The SDP, however, does not specifically consider the regulatory process impact. Thus, although not related to a common regulatory concern, it is necessary to address the violation and finding using different processes to correctly reflect both the regulatory importance of the violation and the safety significance of the associated finding. The traditional enforcement violation was evaluated using the NRC Enforcement Policy, dated January 28, 2013, revised July 9, 2013, and the inspectors determined the violation was SL-IV per Section 6.1.d.2 of the Enforcement Policy, because the associated finding was evaluated by the SDP as having very low safety significance (i.e., Green). The inspectors determined failure to obtain prior NRC approval for fire protection program changes was similar to violations of 10 CFR 50.59 for enforcement purposes. No cross-cutting aspect was assigned to this finding because the cause of the finding was not indicative of present licensee performance, since the change to the Fire Protection Report occurred in 2003. (Section 1R05.11)

Inspection Report# : [2013010](#) (*pdf*)

**Significance:**  Nov 08, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to meet the requirements of large fire and explosion mitigation strategies**

The inspectors identified a Green non-cited violation (NCV) of Browns Ferry Nuclear Plant (BFN) Units 1, 2 and 3, Renewed Operating License Conditions 2.C(4)(b)(7), 2.C(6)(b)(7) and 2.C(10)(b)(7) respectively, for the licensee's failure to meet the requirements of the license condition for large fires or explosion mitigation strategies as discussed in Enclosure 2.

Inspection Report# : [2013010](#) (*pdf*)

**Significance:**  Sep 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to enter Technical Specification for residual heat removal service water maintenance**

The NRC identified a non-cited violation (NCV) of Technical Specifications (TS) 5.4.1.a, Procedures, for the licensee's failure to follow OPDP-8, Operability Determination Process and Limiting Conditions for Operation Tracking. Specifically, the licensee failed to enter a seven day action statement C.1 of Technical Specification 3.7.1, Residual Heat Removal Service Water (RHRSW) system and Ultimate Heat Sink when planned maintenance rendered two RHRSW pumps inoperable. The licensee entered this issue into their corrective action program as Problem Event Report (PER) 751300.

This finding was determined to be more than minor because if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern. The finding affected the Mitigating Systems

cornerstone and using IMC 0609.04, Initial Characterization of Findings and IMC 0609 Appendix A, Exhibit 2 Mitigating Systems screening questions, the finding screened as very low safety significance (Green). The finding did not represent an actual loss of function of a single train for greater than its technical specification allowed outage time and did not represent an actual loss of function of one or more non-technical specification equipment for greater than 24 hours because the licensee restored the C1 and C2 RHRSW pumps on July 5, 2013. The inspectors determined that this finding had a cross-cutting aspect in the area of human performance associated with the work practices component because the licensee failed to ensure that expectations for procedural compliance were properly communicated and that personnel followed procedures. [H.4.b]. (Section 1R13)

Inspection Report# : [2013004](#) (*pdf*)

**Significance:**  Sep 30, 2013

Identified By: NRC

Item Type: FIN Finding

**Failure to clean the safety related pump pit once per two cycles**

An NRC identified finding (FIN) was identified for the licensee's exceeding the maximum allowed periodicity for inspecting and cleaning the Residual Heat Removal Service Water (RHRSW) pump pit per Raw Water Corrosion Program procedure (NPG-SPP 9.7.3).

This finding was determined to be more than minor because, if left uncorrected, the failure to maintain the intake pump pit cleaning would have had the potential to lead to a more significant safety concern in that, it could lead to fouling of safety related coolers, challenging the heat exchanger heat removal function. The finding is associated with the Mitigating Systems cornerstone. Using IMC 0609 Appendix A, Exhibit 2, the finding screened as green because the finding did not represent an actual loss of function of a single train for greater than its technical specification allowed outage time and did not represent an actual loss of function of one or more non-technical specification equipment for greater than 24 hours. The cause of this finding was associated with the human performance area, resources component, cross cutting aspect of maintaining long term plant safety by maintenance of design margins and minimizing preventative maintenance deferrals due to the licensee not allocating resources to clean the intake pump pits. [H.2.(a)]. (Section 1R15)

Inspection Report# : [2013004](#) (*pdf*)

**Significance:**  Jun 04, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to verify the capability of HPCI to achieve required flow and pressure within 30 seconds under accident conditions**

The team identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," for the failure to ensure that post-maintenance and post-modification testing of the high pressure cooling injection (HPCI) pump adequately demonstrated that it could achieve design basis flow within 30 seconds from a cold, non-oil-primed, turbine quick start under design basis conditions. This was a performance deficiency. The test configuration was less limiting than the design basis accident configuration, and the licensee had not verified by calculation or testing that the acceptance criteria in the test was adequate to demonstrate the HPCI pump could perform its function under design basis conditions. The licensee performed an operability review and documented the results in the corrective action program as Problem Evaluation Report 690086.

The performance deficiency was determined to be more than minor because it affected the Design Control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of the HPCI pumps. Specifically, using procedure 3-SR-3.5.1.7, the licensee failed to demonstrate that the HPCI pump could achieve the required flow and discharge pressure under accident conditions as required by the design basis. Additional analysis was required to verify system operability. The team used Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 4, "Initial Characterization of Findings," and Appendix A, "The Significance Determination Process for Findings At-Power," and determined that the finding was of very low safety significance (Green) because the finding was not a design deficiency resulting in the loss of functionality or operability. A cross-cutting aspect was not identified because this performance deficiency has existed since the original design of the plant and was not indicative of current licensee performance. (Section 1R21.2.1)

Inspection Report# : [2013007](#) (*pdf*)

**Significance:**  Jun 04, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to evaluate the effects of the failure of non-class 1 load center transformer cooling fans on the class 1 4160-480V load center transformers and 480V shutdown boards**

The team identified a non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," involving the failure to evaluate the effects of a postulated failure of the load center transformer non-safety-related, non-Class 1E cooling fans, which includes the fan power wiring and fan control equipment, on the safety-related Class 1E shutdown board load center transformers and 480V shutdown boards. This was a performance deficiency. The licensee tested the fans and performed an operability evaluation as documented in Problem Evaluation Report 682254 to provide reasonable assurance that the safety-related transformers would not be damaged from postulated failures from the non-safety-related fans and be capable of operating when required for the design basis accident conditions.

The performance deficiency was determined to be more than minor because the finding affected the Design Control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of the load center transformers TS1A and TS1B and the 480V shutdown boards 1A and 1B respectively. Specifically, the licensee had not evaluated the effects of the failure of non-safety-related transformer cooling fans, on both the safety-related load center transformer and 480V shutdown board and resulted in a reasonable doubt of operability. The team used Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 4, "Initial Characterization of Findings," and Appendix A, "The Significance Determination Process for Findings At-Power," and determined that the finding was of very low safety significance (Green) because the finding was not a design deficiency resulting in the loss of functionality or operability. A cross-cutting aspect was not identified because this performance deficiency has existed since November 2004; therefore, not indicative of current licensee performance. (Section

1R21.2.10)

Inspection Report# : [2013007](#) (pdf)**Significance:**  Jun 04, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to use worst case 4160 VAC bus voltage in design calculations**

The team identified a non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to perform analyses demonstrating that the degraded voltage relay (DVR) set points specified in technical specifications (TS) would ensure adequate voltage to safety-related equipment. This was a performance deficiency. The licensee entered this issue into their corrective action program as PERs 676678 and 696876. As immediate

corrective actions, the licensee performed a sensitivity study to verify that the voltage at the DVR set points specified in TS could provide adequate starting voltage to a sample of limiting safety-related equipment. The performance deficiency was determined to be more than minor because it affected the Design Control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of the 4160 volts alternating current buses. Specifically, the finding challenged the assurance that safety-related loads had adequate motor starting voltage during required degraded voltage scenarios. The team used Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 4, "Initial Characterization of Findings," and Appendix A, "The Significance Determination Process for Findings At-Power," and determined that the finding was of very low safety significance (Green) because the finding was not a design deficiency resulting in the loss of functionality or operability. A cross-cutting aspect was not identified because this performance deficiency has existed since 1993 and was not indicative of current licensee performance. (Section 1R21.2.16)

Inspection Report# : [2013007](#) (pdf)**Significance:**  Jun 04, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to adequately identify, evaluate, and correct the EECW strainers degraded/non-conforming condition**

The team identified a non-cited violation of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to promptly identify and take corrective actions to address a non-conforming condition adverse to quality related to three faulted strainers in the safety related Emergency Equipment Cooling Water system. This was a performance deficiency. The licensee initiated Problem Evaluation Report 677627 to perform a new operability evaluation since the operability evaluation in Problem Evaluation Report 208636 was found to be inadequate. The licensee concluded that there were no current operability issues. The performance deficiency was determined to be more than minor because it affected the Equipment Performance attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of the core spray system to respond to initiating events, in that, if left uncorrected could result in the plant not being able to sustain short-term heat removal under specific conditions. The team used Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 4, "Initial Characterization of Findings," and Appendix A, "The Significance Determination Process for Findings At-Power," and determined that the finding was of very low safety significance (Green) because the finding was not a design deficiency resulting in the loss of functionality or operability. The team evaluated the finding for cross-cutting aspects and determined the finding was associated with the corrective action program component of the problem identification and resolution area, because the licensee did not perform a thorough evaluation of identified problems such that the resolutions addressed the underlying causes and extent of condition. [P.1(c)] (Section 1R21.4)

Inspection Report# : [2013007](#) (pdf)**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to perform evaluation of non-conforming material during commercial grade dedication of safety-related bearings**

The team identified a Green non-cited violation (NCV) of 10 CFR 50 Appendix B, Criterion III, Design Control in that the licensee did not adequately evaluate a commercial grade dedication (CGD) of bearings prior to installing the bearings in a safety-related low pressure coolant injection (LPCI) motor generator (MG) set. Specifically, BFN did not perform an acceptance evaluation of non-conforming materials as required by Section 3.2.6 of NPG-SPP-04.2, Material Receipt and Inspection, Rev. 2. The licensee subsequently initiated prompt corrective actions that included an evaluation of acceptance of the installed bearings, a LPCI operability determination, an extent-of-condition review, and entered the issue in their corrective action program (PER 729646).

The Finding was more than minor because it was associated with the Design Control 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. Additionally the Finding was similar to Example 5.c in Appendix E of IMC 0612. The Finding was of very low significance because the finding was a design qualification deficiency and the affected structure system component (SSC) (3EN LPCI MG set) maintained its operability. This Finding had a cross-cutting aspect in the area of Human Performance, Decision Making because the licensee did not use conservative assumptions when making the decision to accept non-conforming commercial grade bearings for safety-related use, such that nuclear safety was supported. [H.1 (b)] (Section 5.1.3.2.1)

Inspection Report# : [2013011](#) (pdf)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to follow procedure during implementation of plant modifications to the residual heat removal and core spray systems**

The team identified a non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings for the licensee's failure to maintain effective configuration control as required by Procedure NPG-SPP-09.3, Rev. 13, "Plant Modifications and Engineering Change Control." Specifically, the licensee partially implemented permanent plant modifications to the Residual Heat Removal (RHR) and Core Spray (CS) systems under Design Change Notices (DCN) 69466 and 69467 and left these DCNs in partially implemented status beyond two refueling outages without approval of the Vice President of Engineering. This created the potential for a loss of configuration control of the CS and RHR systems. The licensee entered this issue of concern in their corrective action program as SR 739929 and PER 740729 that included actions to evaluate completion or cancellation of the remaining portions of the DCNs.

The team determined the Finding was more than minor because it was associated with the Design Control 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 (i.e. core damage). The finding was of very low significance because it was not a design or qualification deficiency, and it did not result in an actual loss of one or more trains of the RHR or CS systems and/or their function. The finding had a cross-cutting aspect in the area of Human Performance, Work Control because the licensee did not appropriately coordinate work activities by incorporating actions to address the impact of partially implemented DCNs on the plant. [H.3 (b)] (Section 5.1.3.2.2)

Inspection Report# : [2013011](#) (pdf)

**Significance:** G May 24, 2013

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**Two BFN assistant unit operators closed and danger tagged the A1 RHRSW pump manual discharge valve instead of the required A2 RHRSW pump discharge valve**

The team identified a Green, self-revealing non-cited violation (NCV) of Technical Specification (TS) 5.4.1, "Procedures." The team determined that BFN's clearance and tagging application related to the planned A2 residual heat removal service water (RHRSW) pump maintenance was not properly applied and verified as required by TVA Corporate Procedures NPG-SPP-10.2, Rev. 5, "Clearance Procedure to Safely Control Energy," and NPG-SPP-10.3, Rev.1, "Verification Program." Two BFN assistant unit operators (AUOs) closed and danger tagged the A1 RHRSW pump manual discharge valve instead of the required A2 RHRSW pump discharge valve on May, 6, 2013. Upon starting the A1 RHRSW pump, control room alarms provided the operators indication of a system problem, and in the course of responding to the alarm, the operators noted the danger tag. The tags were removed and the pump was declared inoperable to fill and vent the system prior to returning it to an operable status. This issue was entered in to the corrective action program as PER 722859. The performance deficiencies were reasonably within BFNs ability to foresee and correct.

This Finding was more than minor because it was associated with the human performance attribute which occurred when the AUOs closed and tagged the wrong RHRSW pump discharge valve. The AUOs errors adversely affected the Mitigating System cornerstone objective of ensuring the availability, reliability, and capability of the RHRSW and RHR systems that respond to initiating events to prevent undesirable consequences. The team determined that this Finding was of very low safety significance (Green) because it did not represent an actual loss of safety function or safety systems out of service for greater than the TS allowed outage time. The team determined that this Finding had a cross-cutting aspect in the area of Human Performance, Work Practices, because BFN AUOs did not use self-checking and peer checking human error prevention techniques to prevent the inadvertent closure and danger tagging of the A1 RHRSW pump manual discharge valve instead of the required A2 RHRSW pump valve during the application of a tagging clearance.

[H.4(a)] (Section 5.2.2.2.1)

Inspection Report# : [2013011](#) (*pdf*)

**Significance:** G May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Maintenance personnel not following clearance procedure violation**

The team identified a Green non-cited violation (NCV) of Technical Specification (TS) 5.4.1, "Procedures." The team determined that the maintenance Primary Authorized Employee (PAE) did not verify that all blocking points were danger tagged to ensure worker personal safety and equipment protection for the A2 RHRSW pump planned maintenance. The PAE's decision to only verify two of nine clearance components was a violation of TVA Corporate Procedure NPG-SPP-10.2, Rev. 5, "Clearance Procedure to Safely Control Energy". The maintenance PAE did not ensure that the A2 RHRSW pump was isolated from an unexpected release of energy that could have resulted in personnel injury or pump damage. The PAE did not verify or recognize that the A2 RHRSW pump manual discharge valve was full open and not danger tagged closed on May, 6, 2013. This performance deficiency was reasonably within BFNs ability to foresee and correct.

This Finding was more than minor because, if left uncorrected the BFN Maintenance Supervisor's failure to follow the clearance and tagging procedure requirement to verify all danger tag blocking points, he only verified two of nine danger tags, for the A 2 RHRSW planned pump the performance deficiency would have the potential to lead to a more significant safety concern, such as more severe plant transients, engineered safeguard system malfunctions, and a

higher probability of personnel injury. The team determined that this Finding was of very low safety significance (Green) because it did not represent an actual loss of safety function or safety systems out of service for greater than the TS allowed outage time. The team identified a cross-cutting aspect in the Work Practices component of the Human Performance area. Specifically, the licensee ensures supervisory and management oversight of work activities such that nuclear safety is supported. [H.2(c)]. (Section 5.2.2.2.2)

Inspection Report# : [2013011](#) (*pdf*)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to adequately implement procedure 3-SR-3.3.8.2.1(B)**

The team identified a non-cited violation of Technical Specification (TS) 5.4.1, which requires written procedures be established, implemented, and maintained covering activities referenced in NRC Regulatory Guide 1.33, Revision 2, Appendix A, dated February 1978, including surveillance tests. Specifically, a performance deficiency occurred, when the licensee failed to implement the procedure, which required that approved measuring and test equipment be used to measure the underfrequency relay settings during the performance of the Reactor Protection System circuit protector calibration surveillance procedure. Prompt corrective actions included determination that the equipment remained operable and entry of this issue into their corrective action program as problem evaluation report 731144.

The performance deficiency was determined to be more than minor because if left uncorrected, the performance deficiency had the potential to lead to a more significant safety concern, because it could have affected the operability of the relays. The team used Inspection Manual Chapter 0609, Attachment 4, "Initial Characterization of Findings," issued June 19, 2012, for mitigating systems, and Inspection Manual Chapter 0609, Appendix. A, "The Significance Determination Process for Findings at Power," issued June 19, 2012, and determined the Finding to be of very low safety significance (Green) because the Finding did not result in the loss of functionality or operability of a structure, system, or component. The team identified a crosscutting aspect in the work practices component of the Human Performance area, because the licensee did not define and effectively communicate expectations regarding procedural compliance and personnel did not follow procedures [H.4(b)]. (Section 5.2.2.2.4)

Inspection Report# : [2013011](#) (*pdf*)

**Significance:**  May 24, 2013

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**Failure to manage emergent risk condition during A1 and A2 RHRSW inoperability**

The team identified a self-revealing, Green non-cited violation (NCV) of 10 CFR 50.65 (a)(4), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," due to BFN's failure to adequately manage the impact of an emergent risk condition related to the A1 residual heat removal service water (RHRSW) quarterly surveillance test. BFN recognized the online maintenance risk condition however, failed to implement appropriate risk management actions (RMAs) in accordance with Procedure BFN-ODM-4.18, "Protected Equipment." The 'A' and 'B' emergency diesel generators were required to be protected. BFN entered this issue into their corrective action program (CAP) as SR 730356. Specifically, on May 6, 2013, with the A2 RHRSW pump inoperable for planned maintenance, the A1 RHRSW pump was declared inoperable during the A1 RHRSW pump quarterly test due to a tagging error that resulted in Assistant Unit Operators closing and danger tagging the A1 pump manual discharge valve instead of the required A2 pump discharge valve. Upon starting the A1 RHRSW pump, control room alarms provided the operators indication of a system problem, and in the course of responding to the alarm, the operators noted the danger tag. The tags were removed and the pump was declared inoperable to fill and vent the system prior to returning it to an operable status. This issue was entered in to the corrective action program as PER 722859 and

731570.

The team determined that BFN's failure to adequately manage the impact of an emergent risk condition related to the A1 residual heat removal service water (RHRSW) quarterly surveillance test was a performance deficiency that was reasonably within BFN's ability to foresee and correct. The performance deficiency was determined to be more than minor and a Finding because, if the deficiency was left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, the failure to take adequate RMAs could have led to unplanned inoperability of redundant TS or risk significant mitigating systems being relied upon to respond to initiating events to prevent undesirable consequences. The performance deficiency was also determined to be more than minor since it is similar to more than minor Example 7.e of Inspection Manual Chapter (IMC) 0612, Appendix E "Examples of Minor Issues." The Finding was evaluated in accordance with Appendix K, Maintenance Risk Assessment and Risk Management Significance Determination Process, of IMC 0609, "Significance Determination Process," and was determined to be of very low safety significance (Green). This Finding has a cross-cutting aspect in the area of Human Performance, Work Control, because BFN failed to implement immediate RMAs and communicate to the station personnel the change in plant risk condition and protected equipment requirements that may affect work activities. [H.3.(b)]. (Section 5.2.2.2.5)

Inspection Report# : [2013011](#) (pdf)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Requirements for concurrent verification, independent verification and peer checks**

The team identified a Green, non-cited violation (NCV) of Technical Specification (TS) 5.4.1, "Procedures." The team determined that BFN's Requirements for Concurrent Verification, Independent Verification, and Peer Checks were not consistently applied to plant procedures, instructions, and work documents as required by TVA Corporate Procedure NPG-SPP-10.3, Rev.1, "Verification Program," and regulatory requirement ANSI N18.7-1976/ANS-3.2, "Administrative Controls and Quality Assurance for Operational Phase Nuclear Power Plants." BFN documented the issue in SRs 722559, 726755, and PERs 707531, 722859, and 727405.

This finding was more than minor because, if BFN site verification procedure requirement issues and adherence are left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern, such as more severe plant transients, or engineered safeguard system actuations or malfunctions. Additionally, this issue is similar to Example 4.b in IMC 0612, Appendix E, "Examples of Minor Issues," in that the recent inadequate use of human performance error prevention tools (self-checking, peer checking, and missing IVs and CVs in the Procedure NPG-SPP-10.3, Appendix "A," list of 35 BFN systems that are required to have verifications for procedures, instructions, and work documents) have resulted in a reactor scrams, unplanned safety and risk significant system inoperability and unavailability, or other transients. The Finding was determined to be of very low safety significance (Green) in accordance with Inspection Manual Chapter (IMC) 0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings," and IMC 0609, Appendix A, "The Significant Determination Process (SDP) for Findings At-Power," because it did not represent an actual loss of safety function or safety systems out of service for greater than the TS allowed outage time. The team identified a cross-cutting aspect in the Resources component of the Human Performance area, because the licensee did not ensure that procedures were available and adequate to assure nuclear safety. Specifically, accurate and up-to-date procedures, work packages, and correct labeling of components. [H.2(c)]. (Section 5.3.2.2.1)

Inspection Report# : [2013011](#) (pdf)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to translate the design into procedure 3-SR-3.3.8.2.1(B)**

The team identified a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to translate seismic uncertainties into acceptance criteria and measuring and test equipment accuracy requirements into the Reactor Protection System circuit protector calibration surveillance procedure. This was determined to be a performance deficiency. Prompt corrective actions included determination that the equipment remained operable and entry of this issue into their corrective action program as problem evaluation report 723605 and 730495.

The performance deficiency was determined to be more than minor because if left uncorrected, the performance deficiency had the potential to lead to a more significant safety concern because it could have affected the operability of the relays. The team used Inspection Manual Chapter 0609, Attachment 4, "Initial Characterization of Findings," issued June 19, 2012, for mitigating systems, and Inspection Manual Chapter 0609, Appendix. A, "The Significance Determination Process for Findings at Power," issued June 19, 2012, and determined the Finding to be of very low safety significance (Green) because the Finding did not result in the loss of functionality or operability of a structure, system, or component. The team did not identify a cross-cutting aspect because this performance deficiency has existed since 2006 and is not indicative of current licensee performance. (Section 5.3.2.2.4)

Inspection Report# : [2013011](#) (*pdf*)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to implement an adequate test program for RHRSWS and EECS**

The team identified a non-cited violation of 10CFR50, Appendix B, Criterion XI, Test Control, because the licensee did not establish a test program for Residual Heat Removal Service Water (RHRSW) and Emergency Equipment Cooling Water (EECW) pumps such that the test adequately demonstrated the pumps would perform satisfactorily in service. Specifically, BFN did not perform RHRSW/EECW pump performance testing such that it adequately accounted for river water temperature impact on the pump lift, which affected pump flow and vibration performance. The test program did not account for changes to pump lift caused by river water temperature changes; as a result the test program did not adequately monitor pump and system performance and degradation. The licensee completed a prompt operability determination verifying that the pumps remained operable and documented the issue in PERs 730497 and 741036.

The Finding was more than minor because it affected the Mitigating System Cornerstone and if left uncorrected, could become a more significant safety concern. The team determined the Finding was of very low safety significance because it was not a design or qualification deficiency, and it did not result in an actual loss of one or more trains of the RHRSW or EECW systems and/or their function. The Finding had a cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because the licensee did not thoroughly evaluate the changes in RHRSW and EECW pump performance such that the resolution addressed the causes and extent-of-condition. [P.1(c)] (Section 5.4.3.2.1)

Inspection Report# : [2013011](#) (*pdf*)

**Significance:**  May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Deficient design control for RHR service water freeze protection**

The team identified a green non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, Design Control,

involving the failure to maintain adequate design control measures associated with the residual heat remove service water (RHRSW) system freeze protection. Specifically, the team identified that freeze protection was not installed on two RHRSW pump air relief valves (ARV) to maintain operability of the RHRSW system during extended periods of cold weather. BFN entered the issue into their corrective action program under SRs 731375, 727908, and 732519 and PER 732519 and concluded that an immediate operability concern was not present due to the current warm weather conditions and recent satisfactory pump testing. Additionally, BFN performed a detailed inspection of ARVs on all 12 RHRSW pumps, and identified deficiencies on ARVs for eight pumps and entered each item into the CAP.

The team determined that failure to maintain adequate design control measures associated with the RHRSW system freeze protection was a performance deficiency. This Finding was more than minor because it adversely affected the design control attribute of the Mitigating Systems cornerstone and the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process for Findings At-Power,” the team determined that the Finding was of very low safety significance (Green) because it was a deficiency affecting the design or qualification of a mitigating system, structure or component (SSC), where the SSC maintained its operability. The Finding had a cross-cutting aspect in the area of problem identification and resolution, corrective action program problem identification, because BFN did not maintain a low threshold for issue identification such that this issue was identified and resolved during numerous previous focused inspections of the RHRSW system configuration. [P.1(a)] (Section 6.1.4.2.1)

Inspection Report# : [2013011](#) (*pdf*)

## Barrier Integrity

**Significance:** G Mar 31, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to perform MSIV as-found leakage test under suitable conditions**

An NRC identified non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion XI, “Test Control,” was identified for the licensee’s failure to establish adequate written procedures for the test program to determine MSIV as-found leakage that met the requirements of 10 CFR 50, Criterion XI, Test Control. Specifically, Browns Ferry test procedure 3-SR-3.6.1.3.10 did not specify what suitable testing conditions were required to be established prior to testing. Additionally, the practice of allowing multiple valve strokes prior to testing was contrary to the procedure prerequisite of no allowed preliminary adjustments and constituted unacceptable preconditioning of the tested valves. The licensee’s corrective action was to perform “as-left” leakage measurements under different conditions and enter the issue into the corrective action program as PER 847688.

The finding was more than minor because it adversely affected the Barrier Integrity cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Specifically, the failure to determine as-found leakage reduced the ability of the licensee to provide reasonable assurance that the MSIVs would be able to perform their isolation function. The inspectors evaluated the finding using IMC 0609, Appendix A, the Significance Determination Process (SDP) for at-power findings, Exhibit 3 – Barrier Integrity Screening Questions, dated June 19, 2012, and determined the finding was of very low safety significance (Green) because it did not represent an actual open pathway in the physical integrity of reactor containment and did not involve an actual reduction in the function of the hydrogen igniters in the reactor containment. This finding has a cross-cutting aspect in the area of Human Performance, Documentation, because Browns Ferry’s MSIV testing procedures were not complete in that they did not specify all required initial conditions and allowed preconditioning

the valves. [H.7] (Section 1R15)

Inspection Report# : [2014002](#) (*pdf*)

**Significance:** G May 24, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to control a modification to the seismically mounted control room ceiling light diffusers**

The team identified a Green, NRC identified non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion III, “Design Control,” for the licensee’s failure to control deviations from the as built control room envelope design for seismically mounted ceiling light diffusers in accordance with instructions that assure quality standards are controlled. Specifically, contrary to the procedure the licensee unsecured three seismically mounted control room ceiling light diffusers and slid them over the top of other light diffusers creating a seismic missile hazard that could have impacted control room ventilation damper actuators. Once the licensee understood that unfastening the ceiling light diffusers and sliding them over top of other diffusers was creating unanalyzed modifications, the licensee removed the ceiling diffusers from the overhead and placed them in a seismically safe condition. In addition, the licensee clarified the procedure step to have the ceiling light diffusers removed completely. The licensee entered this issue into their CAP as PER 730443. The failure to control a planned modification of the seismically mounted control room ceiling light diffusers was a performance deficiency (PD).

The PD was more than minor because it is associated with the design control attribute of the barrier integrity cornerstone and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Using Inspection Manual Chapter 0609.04, “Phase 1-Initial Screening and Characterization of Findings,” the team determined that the Finding had very low safety significance (Green) because the Finding only represents a degradation of the radiological barrier function for the control room. This Finding has a cross-cutting aspect in the area of human performance because the licensee did not define and effectively communicate expectations regarding procedural compliance and personnel follow procedures. (H.4.(b) (Section 5.2.4.2.1)

Inspection Report# : [2013011](#) (*pdf*)

## Emergency Preparedness

**Significance:** TBD Dec 31, 2013

Identified By: NRC

Item Type: VIO Violation

**Failure to maintain emergency response staffing levels**

The NRC identified an apparent violation of 10 CFR 50.54(q), Emergency Plans, for the licensee’s failure to maintain plant staffing levels in accordance with NP-REP, Tennessee Valley Authority Nuclear Power Radiological Emergency Plan. Specifically, the licensee’s process for maintaining minimum emergency response shift staffing failed to adequately maintain staffing of the Shift Technical Advisor (STA) and Incident Commander to ensure initial accident response in all key functional areas. The licensee has entered this issue into their corrective action program as PERs 790092 and 801057.

The inspectors determined the performance deficiency was more than minor because it was associated with the ERO readiness attribute of the emergency preparedness cornerstone and adversely impacted the cornerstone objective of ensuring that the licensee is capable of implementing adequate measures to protect the health and safety of the public

in the event of a radiological emergency. Specifically, the failure to maintain required emergency response staffing levels reduced the licensee's capabilities to respond to an emergency. The inspectors assessed the finding in accordance with Appendix B, Emergency Preparedness Significance Determination Process and determined that this finding represented a Loss of Planning Standard Function and has preliminarily been determined to be a finding of White significance. Because the significance of this finding is not yet finalized, it is being characterized as "To Be Determined (TBD)," pending a final significance determination. The cause of the finding was determined to be associated with the cross-cutting aspect of thorough evaluation of problems in the corrective action component of the problem identification and resolution area because the licensee failed to ensure that issues potentially affecting nuclear safety were thoroughly evaluated. [P.1(c)] (Section 1R11.2.b(1))

Inspection Report# : [2014002](#) (*pdf*)

Inspection Report# : [2013005](#) (*pdf*)

**Significance: TBD** Dec 31, 2013

Identified By: NRC

Item Type: AV Apparent Violation

**Inaccurate information provided concerning onsite emergency response organization staffing requirements**

The NRC identified two examples of an Apparent Violation of 10 CFR 50.9, "Completeness and accuracy of information," for the licensee's apparent failure to provide complete and accurate information associated with emergency response on-shift staffing requirements. Specifically, on two occasions the licensee apparently provided inaccurate information to the NRC concerning onsite emergency response organization minimum staffing requirements. The licensee augmented on-shift staffing levels on October 30, 2013. These issues were entered into the Browns Ferry corrective action program as PERs 790109, 790092, and 801057.

These apparent violations had the potential to impede or impact the regulatory process, and therefore subject to traditional enforcement as described in the NRC Enforcement Policy, dated July 9, 2013. Because these apparent violations involved the traditional enforcement process with no underlying technical violation that would be considered more than minor in accordance with IMC 0612, a cross-cutting aspect was not assigned to this violation. (Section 1R11.2.b(2))

Inspection Report# : [2013005](#) (*pdf*)

**Significance: TBD** Dec 31, 2013

Identified By: NRC

Item Type: AV Apparent Violation

**Inappropriate amendment of license conditions**

The NRC identified an apparent violation (AV) of 10 CFR 50.90, Application for Amendment of License, Construction Permit, or Early Site Permit for the licensee's apparent failure to submit an application requesting an amendment to their operating license concerning on-shift staffing levels. The licensee augmented on-shift staffing levels on October 30, 2013. The issue was entered into the Browns Ferry corrective action program as PERs 790109 and 801057.

This apparent violation had the potential to impede or impact the regulatory process, and therefore was subject to traditional enforcement as described in the NRC Enforcement Policy, dated July 9, 2013. Because this apparent violation involved the traditional enforcement process with no underlying technical violation that would be considered more than minor in accordance with IMC 0612, a cross-cutting aspect was not assigned to this violation. (Section 1R11.2.b(3))

Inspection Report# : [2013005](#) (*pdf*)

## Occupational Radiation Safety

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## Public Radiation Safety

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## 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.

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## Miscellaneous

Last modified : May 30, 2014