

Callaway

4Q/2015 Plant Inspection Findings

Initiating Events

Significance:  Dec 31, 2015

Identified By: Self-Revealing

Item Type: FIN Finding

Failure to Follow Plant Procedure for Unit Reliability Team

The inspectors reviewed a self-revealing finding for the licensee's failure to follow plant procedures for the unit reliability team. Specifically, after delaying a modification to the plant's turbine control system, no compensatory measures were implemented to minimize or prevent failure of the system due to aging of the system beyond its evaluated service life as required by plant Procedure APA-ZZ-00549, Appendix E, "Unit Reliability Team Operations."

The licensee's failure to follow the plant procedure for the unit reliability team was a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because it is associated with the equipment performance attribute of the Initiating Events Cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, as no compensatory measures were implemented after the digital upgrade to the turbine control system was deferred from the spring 2013 refueling outage to the spring 2016 refueling outage, the turbine control system malfunctioned causing a runback of the turbine and downpower transient on the plant. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 1, "Initiating Events Screening Questions," dated June 19, 2012, the finding was determined to be 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. This finding has a cross-cutting aspect in the teamwork component of the human performance cross-cutting area because the licensee did not ensure that individuals and work groups communicate across organizational boundaries to ensure nuclear safety is maintained. Specifically, the outage leadership team identified the need for the compensatory measures, but did not communicate the priority nor the effect on nuclear safety to site leadership to gain the resources needed to implement these measures.

Inspection Report# : [2015004](#) (*pdf*)

Mitigating Systems

Significance:  Nov 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Verify the Suitability of the Design of the Reverse-Engineered Replacement Controller Cards for the Auxiliary Feedwater Flow Control Valves

The team identified a non cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to assure that the design of the replacement reverse engineered Modutronics controller cards for the auxiliary feedwater control valves were suitable for their application. Specifically, as of August 11, 2015, the licensee failed to establish suitable interface requirements in procurement documents to Nuclear Logistics Incorporated (the

vendor) and verify the adequacy of the design by either design reviews or testing. Specifically, the team identified that neither the licensee nor the vendor had performed a design review sufficient to assure that the Modutronics controller cards were suitable for their application. In addition, the licensee had not provided the vendor with sufficient information to reverse engineer the controller cards. Lastly, neither the licensee nor the vendor performed testing sufficient to verify the adequacy of the design of the new Modutronics controller cards. As a result, the replacement cards were supplied with motor field current rectifier bridges that were undersized and marginal for their application, such that two of them failed in service, rendering these auxiliary feedwater system valves inoperable. Following performance of a root cause analysis, the licensee replaced the deficient controller cards with those of a higher current rating. The licensee initiated Callaway Action Request 201505796 to place this item into the corrective action program.

The failure to ensure that the design of the replacement for the Modutronics cards was suitable for their application was a performance deficiency. This performance deficiency is more than minor, and therefore, a finding because it adversely affected 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. Specifically, design deficiencies associated with these circuit cards resulted in the inoperability of auxiliary feedwater control valves and their ability to operate on demand. The team performed an initial screening of the finding in accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At Power." Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," dated June 19, 2012, the team determined that the finding required a detail risk evaluation because it represented the potential loss of one train of safety-related equipment (auxiliary feedwater) for greater than the technical specification allowed outage time. A Region IV senior reactor analyst performed a detailed risk evaluation in accordance with Appendix A, Section 6.0, "Detailed Risk Evaluation," which determined that the finding was of very low safety significance (Green). The analyst determined that the importance of the failure of valves ALHV0005 and ALHV0007 was based on the postulated failure time of the turbine driven auxiliary feedwater pump because this determined the position in which the valves failed. The internal events incremental conditional core damage probability was 8.17×10^{-7} . The analyst also determined that the finding had only a minimal effect on external initiator risk and that the finding would not involve a significant increase in the risk of a large, early release of radiation.

This finding has a human performance cross cutting aspect in the area of teamwork, because individuals in different work groups did not appropriately communicate across organizational boundaries. Specifically, licensee personnel did not adequately communicate the design and testing requirements for the reverse engineered cards.(H.4)

Inspection Report# : [2015009](#) (pdf)

Significance:  Nov 30, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Have an Adequate Procedure for Calibration of the Auxiliary Feedwater Pump Flow Control Valve Potentiometer

The team reviewed a self revealing non cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for failure to prescribe activities affecting quality using procedures appropriate to the circumstances. Specifically, on November 18, 2009, the licensee revised Procedure MTE ZZ QA033, "MOVATS UDS [motor operated valve actuator test system universal diagnostic system] Testing of Torque Controlled Modutronics Limitorque Motor Operated Rising Stem Valves," Revision 3, to incorporate a second method of valve testing, and introduced an error in bypassing a test of the Modutronics board setup feedback potentiometer. As a result, on July 23, 2015, the actuator misinterpreted the actual position of the valve, which subsequently failed to open when operators attempted to open the valve following a forced reactor shutdown. In response to this issue, the licensee has reviewed all maintenance and test activities that could affect the potentiometer and has revised the appropriate procedures. This finding was entered into the licensee's corrective action program as Callaway Action Request

201505332.

The failure to provide a procedure appropriate to the circumstances for an auxiliary feedwater system flow control valve was a performance deficiency. This finding was more than minor, and therefore, a finding because it adversely affected the Mitigating Systems Cornerstone attribute of Procedure Quality and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to provide a procedure appropriate to the circumstances to set up an auxiliary feedwater system flow control valve feedback potentiometer resulted in its inability to operate manually on demand. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," dated June 19, 2012, the finding was determined to be of very low safety significance, because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non technical specification trains of equipment designated as high safety significance. The valve would have automatically throttled auxiliary feedwater flow to approximately 300 gpm on demand. This finding did not have a cross-cutting aspect because the procedure revision resulting in the inadequate procedure was issued in 2009, and previous opportunities to correct the procedure occurred in 2010. Thus, this performance deficiency was not indicative of current licensee performance.

Inspection Report# : [2015009](#) (pdf)

Significance:  Nov 30, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Have an Adequate Post-Maintenance Test for Setting the Motor-Driven Auxiliary Feedwater Flow Control Valve Modutronics Potentiometer

The team reviewed a self revealing non cited violation of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," for failure to ensure that testing demonstrated that structures, systems, and components will perform satisfactorily in service. Specifically, on October 24, 2014, the licensee failed to establish a suitable post maintenance test program to demonstrate that the motor driven auxiliary feedwater flow control valve Modutronics potentiometer had been set correctly after maintenance. The testing consisted of stroking the valve full open or full closed, and did not consider step changes in valve positioning and did not confirm the potentiometer feedback settings during valve positions that were not full open or full closed. In response to this issue, the licensee performed another calibration of the potentiometer, focusing on the potentiometer position during the valve stroke. The new post maintenance test included opening the valve in discreet step changes to test the valve position feedback potentiometer. This finding was entered into the licensee's corrective action program as Callaway Action Request 201505332.

The failure to establish a suitable post maintenance test program to demonstrate that the motor driven auxiliary feedwater flow control valve Modutronics potentiometer would be set correctly after maintenance or testing was a performance deficiency. This finding was more than minor, and therefore, a finding because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to establish a post maintenance testing program for the motor driven auxiliary feedwater valve Modutronics potentiometer to verify that the potentiometer was set correctly, resulted in valve ALHV0011 failing to open when operators initiated a signal to place the valve in an open position. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at Power," Exhibit 2, "Mitigating Systems Screening Questions," dated June 19, 2012, the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather. The team determined that this finding did not have a cross cutting aspect because the most significant contributor did not reflect current licensee performance.

Inspection Report# : [2015009](#) (pdf)

Significance:  Nov 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Two Examples of a Failure to Properly Designate the Significance Level of Callaway Action Requests

The team identified two examples of a non cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the licensee’s failure to implement their corrective action program procedure. Specifically: (1) on November 20, 2014, the licensee designated the improper setting of the auxiliary feedwater flow control valve ALHV005 limit switches as Significance Level 5 (administrative close) instead of Significance Level 3 (lower tier cause evaluation) and (2) on December 9, 2014, the licensee downgraded the failure of the Modutronics card for valve ALHV0005 from Significance Level 1 (root cause analysis) to Significance Level 3 based on unverified assumptions of the failure mechanisms. Following failure of the Modutronics card for valve ALHV0005, the licensee assumed that the early failure was due to a manufacturing defect (infant mortality) without supporting data to prove this designation. The licensee entered these issues into the corrective action program as Callaway Action Requests 201506921 and 201507235.

The two failures to properly designate the Significance Level of Callaway action requests constitute a performance deficiency. This finding was more than minor, and therefore, a finding because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failures to properly designate the significance of the conditions precluded determining the appropriate cause determinations and extent of conditions and resulted in failure to correct the conditions before they further manifested themselves following a trip. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, “Mitigating Systems Screening Questions,” dated June 19, 2012, the finding was determined to be of very low safety significance, because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non technical specification trains of equipment designated as high safety significance. This finding has a human performance cross cutting aspect in the area of conservative bias in that the decision-making did not demonstrate a conservative/prudent choice in designating the significance level of the Callaway action requests based on two cases of unverified/incorrect information.(H.14)

Inspection Report# : [2015009](#) (pdf)

Significance:  Nov 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Determine the Cause and Take Corrective Action to Preclude Repetition for the Inadequate Design of Auxiliary Feedwater Flow Control Valve Modutronics Cards

The team identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” for the licensee’s failure to determine the cause and take corrective action to preclude repetition for a significant condition adverse to quality. Specifically, on May 21, 2015, the licensee received new information that refuted the previously assumed failure mechanism for AFW flow control valve ALHV0005 documented in December 2014, but failed to initiate a new Callaway action request to document the new information and report it to appropriate levels of management. As a result, the licensee failed to identify the failure of the valve as a significant condition adverse to quality, determine the cause, initiate a prompt operability assessment, and identify corrective action to preclude repetition until valve ALHV0007 failed, for the same reason, following a reactor trip on August 11, 2015. The licensee entered this issue into the corrective action program as Callaway action request 201506846.

The failure to determine the cause and take corrective action to preclude repetition for a significant condition adverse to quality when failure analysis indicated that a significant defect existed on valves ALHV0005 and ALHV0007 was a performance deficiency. This finding was more than minor, and therefore, a finding, because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure of the licensee to determine the cause and take corrective action to preclude repetition for a significant condition adverse to quality when new information on the failure mechanism was received precluded determining the root cause and extent of condition and the performance of an operability determination, which resulted in failure to correct the condition before it further manifested itself following a reactor trip. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," dated June 19, 2012, the finding was determined to be of very low safety significance, because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non technical specification trains of equipment designated as high safety significance. This finding has a human performance cross cutting aspect in the area of consistent process in that the individuals that received the information concerning the failure mechanism of the Modutronics cards failed to use a systematic approach to documenting the information and communicating it to appropriate levels of management.(H.13)

Inspection Report# : [2015009](#) (pdf)

Significance:  Nov 30, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Have an Adequate Procedure for Testing the Torque and Thrust Values for the Auxiliary Feedwater Pump Flow Control Valves

The team reviewed a self revealing non cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for failure to provide a procedure appropriate to the circumstances. Specifically, on March 4, 2014, the licensee performed Job 08505547, and had not correctly accounted for the differential pressure the valve would actually experience, and had incorrectly set and tested the close torque switch on valve ALHV0005. As a result, On November 15, 2015, during steam generator filling operations, Valve ALHV0005 failed to move in the closed direction when the torque switch opened. The incorrect close torque switch setting prevented the valve from going full closed. In response to this issue, the licensee, using Job 14005755, repaired the valve, and confirmed that the close torque switch settings were correct and successfully retested. This finding was entered into the licensee's corrective action program as Callaway Action Report 201508399.

The failure to establish a procedure that included a suitable instructions to set the torque switch on a motor driven AFW valve after maintenance or testing was a performance deficiency. This finding was more than minor, and therefore, a finding because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to establish a post maintenance testing program for the motor driven auxiliary feedwater valve torque and thrust settings caused valve ALHV0005 not to close completely, causing the operators to take action and shut down motor driven feedwater pump B. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at Power," Exhibit 2, "Mitigating Systems Screening Questions," dated June 19, 2012, the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather. The team determined that this finding had a cross cutting aspect in the area of human performance, challenge the unknown, because the licensee did not stop and challenge that the tested differential pressure across valve ALHV0005 was significantly different than the other valves.(H.11)

Inspection Report# : [2015009](#) (pdf)

Significance:  Nov 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Identify and Correct Additional Undersized Components on Auxiliary Feedwater System Flow Control Valve Modified Modutronics Controller Cards

The team identified a non cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” for the licensee’s failure to identify and correct a condition adverse to quality. Specifically, as of September 23, 2015, the licensee had not taken corrective action, following previous identification of undersized field current rectifier bridges, to ensure that an independent review of the modified circuit design had been completed, or that the modified cards had been subjected to a sufficient testing and qualification program. Thus, following questioning by the team, the licensee identified additional components (two other rectifier bridges) on the newly modified circuit cards that were also potentially undersized. The licensee performed an operability evaluation and concluded that the new cards were operable, based on additional circuit analysis that was performed. This issue was entered into the corrective action program as Callaway Action Request 201506874.

The failure to identify and correct a condition adverse to quality was a performance deficiency. This performance deficiency is more than minor, and therefore, a finding because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to identify and correct design deficiencies associated with these circuit cards could have resulted in the inoperability of auxiliary feedwater control valves and their inability to operate on demand. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, “Mitigating Systems Screening Questions,” dated June 19, 2012, the finding was determined to be of very low safety significance, because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non technical specification trains of equipment designated as high safety significance. This finding has a human performance cross cutting aspect in the area of Avoid Complacency, because the licensee did not thoroughly evaluate the issue to ensure that the resolutions address causes and extent of conditions. Specifically, the licensee had identified that the Modutronics cards failed because of improper design of the field current rectifier bridge, but did not plan for the possibility for other latent issues to determine if other components on the cards were adequately sized for their application.(H.12)

Inspection Report# : [2015009](#) (pdf)

Significance:  Sep 30, 2015

Identified By: NRC

Item Type: FIN Finding

Failure to Conduct Simulator Testing and Maintenance In Accordance with ANSI/ANS-3.5-2009

The inspectors identified a finding with four examples for failing to conduct and evaluate simulator performance testing in accordance with the standards of ANSI/ANS-3.5-2009. Specifically, the licensee failed to do the following:

- set the instantaneous main turbine load reduction to 50 percent as supported by design basis data in the 2014 performance of Transient (11), “Maximum Design Load Rejection”
- include the evaluation of parameter “pressurizer temperature” in the 30 percent, 50 percent, and 80 percent power Steady-State Performance Test as specified in accordance with the standard, Appendix B, Section B.3.1
- include the evaluation of parameter “secondary heat balance data” in the 30 percent, 50 percent, and 80 percent power Steady-State Performance Test as specified in accordance with the standard, Appendix B, Section B.3.1
- replicate the dynamic functioning of annunciators on the simulator panels used during normal, abnormal, off-normal, and emergency evolutions, or to identify and correct noticeable differences in accordance with the standard, Sections 4.2.1.2 and 4.2.1.4

The licensee initiated corrective action documented in Callaway Action Requests 201504760, 201504759, 201504418, and 201504355.

The licensee's failure to conduct and evaluate performance testing in accordance with the ANSI/ANS-3.5-2009 standard as endorsed by Regulatory Guide 1.149, Revision 4, was the performance deficiency. The performance deficiency is more than minor because it adversely impacted the human performance attribute of the Mitigating Systems Cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Additionally, if left uncorrected, the performance deficiency could have become more significant in that not correcting noticeable differences between the simulator and the reference plant can both leave the potential for negative training of licensed operators and call into question the ability to conduct valid licensing examinations with the simulator. Using Manual Chapter 0609, "Significance Determination Process," Attachment 4, Tables 1, 2, and 3 worksheets; and the corresponding Appendix I, "Licensed Operator Requalification Significance Determination Process (SDP)," Flowchart Block #14, the finding was determined to have very low safety significance (Green) because it dealt with deficiencies associated with simulator testing, modification, and maintenance and there was no evidence that the plant-referenced simulator does not demonstrate the expected plant response or have uncorrected modeling and hardware deficiencies related to the examples.

The examples supporting this finding involved actions taken with the simulator testing and maintenance program before the present performance period. Therefore, no cross-cutting aspect is assigned to the finding.

Inspection Report# : [2015003](#) (pdf)

Significance:  Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform Operability Determination Procedure

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to follow their operability determination procedure. Specifically, when an auxiliary feedwater control valve failed to operate from the main control room, the licensee failed to evaluate the operability of the component in accordance with Procedure ODP-ZZ-00001, Addendum 15, "Operability and Functionality Determinations." The immediate corrective action taken by the licensee was to evaluate the operability of the flow control valve. After determining that the equipment was inoperable, the licensee entered the required technical specification condition and performed the required technical specification actions. The licensee entered this issue into their corrective action program as Callaway Action Request 201502708.

This performance deficiency is more than minor and, therefore, a finding, because, if left uncorrected, it has the potential to lead to a more significant safety concern if safety-related systems are not properly evaluated for operability. The finding affects the Mitigating System Cornerstone because the performance deficiency is related to the auxiliary feedwater system's ability to conduct short-term decay heat removal. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," the finding was determined to be of very low safety significance because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non-technical specification trains of equipment designated as high safety-significance. This finding has a cross-cutting aspect of challenge the unknown in the human performance cross-cutting area because the licensee did not stop when faced with uncertain conditions. Specifically, rather than declaring the system inoperable and allowing the process to evaluate the condition, the licensee declared the system operable without fully understanding the failure mechanism.(H.11)

Inspection Report# : [2015003](#) (pdf)

Significance:  Jun 20, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Properly Implement Compensatory Actions as Directed by Operability Evaluation

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to properly implement procedure directed compensatory actions necessary for operability of safety-related equipment. Specifically, when the train B class 1E switchgear air conditioning unit (SGK05B) was taken out of service for maintenance, compensatory measures to open all of the doors between both trains of engineered safety feature ac and dc switchgear and batteries were not implemented correctly. This resulted in less than calculated minimum cooling air flow required under accident conditions to support operability of the associated switchgear. The licensee entered this issue into their corrective action program as Callaway Action Request 201503501. The corrective actions include revising the compensatory action procedures and providing training on the issue.

The licensee's failure to properly implement compensatory actions necessary to maintain operability of safety-related equipment in accordance with plant procedures was a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because it is similar to examples 3.i, 3.j, and 3.k in Inspection Manual Chapter 0612, Appendix E, "Examples of Minor Issues," and it is associated with the equipment performance 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). Specifically, between May 6 and 7, 2015, when the train B class 1E switchgear air conditioning unit (SGK05B) was taken out of service for maintenance, compensatory measures to open all of the doors between both trains of vital batteries, chargers, and engineered safety feature switchgear were not implemented correctly and when discovered required significant evaluation to determine the operability status of the supported equipment during the maintenance. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," the finding was determined to be of very low safety significance because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non-technical specification trains of equipment designated as high safety-significance. This finding has a cross-cutting aspect of "Challenge the Unknown" in the human performance cross-cutting area because individuals did not stop when faced with uncertain conditions and risks were not evaluated and managed before proceeding. Specifically, operations personnel did not question why they were only opening one door of a double door set when implementing the compensatory measures to allow cool air in the air conditioned rooms to cool the rooms without air conditioning.(H.11)
Inspection Report# : [2015002](#) (*pdf*)

Significance:  Jun 20, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Inadequate Operability Evaluation When Taking Emergency Diesel Generator Support Equipment Out of Service

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to perform an adequate operability evaluation on the train A emergency diesel generator when required

support equipment was taken out of service for maintenance. This resulted in necessary compensatory actions not being in place when the support equipment was taken out of service. The immediate corrective action taken by the licensee was to perform a prompt operability determination and implement compensatory measures. The licensee plans to evaluate the current planned maintenance process for safety related support equipment. The licensee entered this issue into their corrective action program as Callaway Action Request 201502708.

The licensee's failure to perform a prompt operability determination after bounding conditions were applied to the immediate operability determination per plant procedures was a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because it is associated with the equipment performance 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). Specifically, the failure of the licensee to perform an adequate operability evaluation resulted in the failure to implement required compensatory actions to maintain operability of the train A emergency diesel generator. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," the finding was determined to be of very low safety significance because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non-technical specification trains of equipment designated as high safety-significance. This finding has a work management cross-cutting aspect in the human performance cross-cutting area because the licensee did not appropriately implement a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. Specifically, not having a clear work process for assessing operability of technical specification components when support systems are taken out of service for planned maintenance led to operators failing to adequately evaluate the operability of the train A emergency diesel generator. (H.5) Inspection Report# : [2015002](#) (*pdf*)

Significance:  May 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Identify and Evaluate all Targets Within the Zone of Influence of Ignition Sources

The inspectors identified a non-cited violation of 10 CFR 50.48(c) and National Fire Protection Association Standard 805 for the licensee's failure to address the effects of fire damage to risk-significant circuits impacted by an analyzed fire scenario. Specifically, the licensee failed to identify that a target cable raceway containing circuits that could impact the ability to achieve safe and stable conditions during a fire would be impacted during a fire scenario. The licensee entered this issue into their corrective action program as Callaway Action Request 201503262.

The inspectors determined that the failure to identify a fire risk important cable raceway impacted by a fire scenario was a performance deficiency. The performance deficiency was determined to be more than minor because it is associated with the reactor safety Mitigating Systems cornerstone attribute of protection against external factors (i.e., fire) and 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 Inspection Manual Chapter (IMC) 0609, Appendix F, "Fire Protection Significance Determination Process," dated September 20, 2013, as the finding affected post-fire safe shutdown. Using IMC 0609, Appendix F, Attachment 1, "Fire Protection Significance Determination Process Worksheet," dated September 20, 2013, the finding was screened as a Green finding of very low safety significance in accordance with Step 1.3.

The finding did not have a cross-cutting aspect since it was not indicative of current licensee performance since the original ignition source and target walkdowns were performed in 2010.

Inspection Report# : [2015007](#) (*pdf*)

Significance: G Mar 21, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform Post-maintenance Testing on Safety-related Equipment Prior to Declaring it Operable

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to conduct post-maintenance testing after maintenance on safety-related equipment prior to declaring the system operable in accordance with Procedure ODP-ZZ-00002, "Equipment Status Control," Revision 76. Specifically, the train A component cooling water system was declared operable before performing post-maintenance testing on the train A safety injection pump lube oil cooler cooling water outlet relief valve after this valve was replaced. Additionally, when the post-maintenance test was later performed, it failed to meet acceptance criteria. Despite the failure, the licensee did not enter the condition into their corrective action program nor write a new job to address the test failure in accordance with Procedure APA-ZZ-00322, Appendix E, "Post Maintenance Test Program." The licensee entered this issue into their corrective action program as Callaway Action Request 201501853 and performed a second post-maintenance test, which was completed satisfactorily.

The licensee's failure to verify that all post-maintenance testing had been completed prior to declaring the system operable was a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because it is similar to example 5.b in Inspection Manual Chapter 0612, Appendix E, "Examples of Minor Issues," and it is associated with the equipment performance 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). Specifically, on October 29, 2014, the train A component cooling water system was declared operable and returned to service for approximately 7 hours without completion of post-maintenance testing. When the post-maintenance testing was performed, it failed to meet the acceptance criteria due to system leakage at the flanged connection. No further actions were taken when the leakage was identified resulting in the train A component cooling water system having a known unevaluated degraded condition adversely affecting the reliability of the system between October 29, 2014, and March 19, 2015. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," the finding was determined to be of very low safety significance because it did not affect system design, did not result in a loss of system function, did not represent a loss of function of a single train for greater than its technical specifications allowed outage time, and did not cause the loss of function of one or more non-technical specification trains of equipment designated as high safety-significance. Specifically, the component cooling water leakage could be made up from a safety-related source without loss of function. This finding has a work management cross-cutting aspect in the human performance cross-cutting area because the licensee did not appropriately implement a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. Specifically, omitting the correct equipment out of service log entry

from the post-maintenance test work task led to operations returning the equipment to service prior to it being tested.(H.5)
 Inspection Report# : [2015001](#) (*pdf*)

Barrier Integrity

Significance:  Dec 31, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Promptly Correct a Condition Adverse to Quality on the Reactor Coolant System

The inspectors reviewed a self-revealing, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” for the licensee’s failure to correct a condition adverse to quality. Specifically, after identifying boric acid deposits on the flange downstream of valve BBV0400, a reactor coolant system boundary valve, the licensee did not promptly take action to stop the reactor coolant system leakage before it worsened and caused a plant shutdown due to reactor coolant system leakage in excess of technical specification limits. The immediate corrective action was to torque the valve and flange to reduce leakage to within limits. The licensee entered this issue into their corrective action program as Callaway Action Request 201505308.

The licensee’s failure to correct the condition adverse to quality (i.e. leakage past valve BBV0400) in a timely manner was a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because it is associated with the reactor coolant system equipment and barrier performance attribute of the Barrier Integrity Cornerstone and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. Specifically, the failure to correct the reactor coolant system leakage through valve BBV0400 resulted in reactor coolant system leakage worsening and exceeding technical specification limits, and a plant shutdown. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 1, “Initiating Events Screening Questions,” dated June 19, 2012, the finding was determined to be of very low safety significance because after a reasonable assessment of degradation, it could not: 1) result in exceeding the reactor coolant system leak rate for a small loss of coolant accident, or 2) have likely affected other systems used to mitigate a loss of coolant accident resulting in a total loss of their function. This finding has a cross-cutting aspect in the work management component of the human performance cross-cutting area because the licensee failed to implement a process of planning, controlling, and executing work activities such that nuclear safety is the overriding priority. Specifically, the licensee initially planned to address the reactor coolant leakage six months after the issue was identified, and then moved it out an additional three months, failing to prioritize the work commensurate with its safety significance.

Inspection Report# : [2015004](#) (*pdf*)

Significance:  Dec 31, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Properly Establish and Maintain a Plant Procedure for Preparation for Refueling Outages

The inspectors reviewed a self-revealing, non-cited violation of Technical Specification 5.4.1, “Procedures,” for the licensee’s failure to establish, implement, and maintain a procedure recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Specifically, Procedure ODP-ZZ-00022, “Operations Preparation, Performance, and Restoration from Refueling Outages,” did not provide adequate guidance to ensure a blind flange located on the reactor coolant system was properly reinstalled resulting in reactor coolant system leakage into containment. The immediate corrective action taken by the licensee was to replace the gasket with a Flexitallic gasket and torque the

flange. Additionally, the licensee implemented repetitive maintenance tasks in their work management program to identify flanges removed during an outage and to torque them properly upon reinstallation. The licensee entered this issue into their corrective action program as Callaway Action Request 201505702.

The licensee's failure to properly establish and maintain Procedure ODP-ZZ-00022 was a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because it is associated with the procedure quality performance attribute of the Barrier Integrity Cornerstone and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. Specifically, Procedure ODP-ZZ-00022, did not provide adequate guidance to ensure the blind flange located downstream of valve BBV0400 was properly reinstalled. Using Inspection Manual Chapter 0609, Appendix A, Exhibit 1, "Initiating Events Screening Questions," dated June 19, 2012, the finding was determined to be of very low safety significance because after a reasonable assessment of degradation, it could not: 1) result in exceeding the reactor coolant system leak rate for a small loss of coolant accident, or 2) have likely affected other systems used to mitigate a loss of coolant accident resulting in a total loss of their function. This finding does not have a cross-cutting aspect because the performance deficiency is not representative of current licensee performance, in that the inadequate instructions were added to the procedure in 2003.

Inspection Report# : [2015004](#) (pdf)

Emergency Preparedness

Occupational Radiation Safety

Significance:  Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Unauthorized Non-Routine Maintenance on a Sealed Source Device

The inspectors identified a non-cited violation of Callaway Plant's License No. NPF-25, Condition 2.B.(3), for the licensee performing non-routine maintenance on a J.L. Shepherd calibrator without license authorization. The licensee documented this issue in their corrective action program as Corrective Action Request 201505175. Their immediate corrective action was to secure the calibration source and review their procedural requirements.

Performing non-routine maintenance on a J.L. Shepherd calibrator without a license authorization is a performance deficiency. This finding is more than minor because the performance deficiency adversely affects the Occupational Radiation Safety Cornerstone, in that, if the licensee performs non-routine maintenance on radiologically risk significant sources without being specifically authorized or trained on how to perform the non-routine maintenance, an uncontrolled high radiation area could result. Using Inspection Manual Chapter 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," dated August 19, 2008, the inspectors determined the violation was of very low safety significance (Green) because (1) it was not an as low as reasonably achievable finding, (2) there was no overexposure, (3) there was no substantial potential for an overexposure, and (4) the ability to assess dose was not compromised. The finding had a conservative bias cross-cutting aspect in the area of human performance, because individuals did not use decision making practices that emphasized prudent choices over those that were simply allowable, or ensure a proposed action was safe in order to proceed, rather than unsafe in order to stop. Specifically, licensee staff assumed that they could perform any type of maintenance on the calibrator without verifying that their license authorized those activities.(H.14)

Inspection Report# : [2015003](#) (pdf)

Public Radiation Safety

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.

Miscellaneous

Last modified : March 01, 2016