

Branch Evaluation, Plan & Recommendation Allegation Number: RIV-2010-A-0094			
Concern: 1.			
Responsible Branch:	RPBD	*RX Code or Functional Area:	Engineering
*OI Investigation Priority:		*Discipline:	Corrective Action
*OI Priority Basis:		OI Case Number:	4-20XX-0XX
Concern: (A concern is one or two sentences.) After identifying that one cell of Class-IE battery 2B008 was degraded, insufficient actions were taken by the licensee. The associated Notification (CAP document) was closed with no corrective actions taken.			
Concern Background, Supporting Information, & Comments: On (b)(7)(C) the CI identified in Notification (NN) (b)(7)(C) that cell # 13 of safety-related battery 2B008, which had been identified as degraded and removed from service, should be returned to the manufacturer for a cause evaluation. A task was generated under this notification to qualify a spare battery jar for 1E use and to return the degraded cell to the vendor for cause evaluation to determine if the rest of the battery batch was affected by this failure. The notification was closed on (b)(7)(C) before this action was completed. The affected cell remains on the battery rack as a spare. The battery was < 1 year old at the time of failure. [CI provided a copy of the NN with the allegation – some of these details were taken from the NN.]			
Regulatory Requirement: (fill in below) 10CFR50, App. B, Crit XVI, Corrective Action -Failure to evaluate cause of degradation could result in failure to correct the condition adverse to quality in a timely manner.			
*Safety Significance:	HIGH	X	Normal
			N/A
Basis: Describe the concern's safety significance (current, on going issue; level of individual(s) involved; etc.). Current event that does not require prompt regulatory response and that does not involve an immediate safety or security issue			
Check each question as applicable to this concern.			
X	Is it a declaration, statement, or assertion of impropriety or inadequacy? Is there a potential deficiency?		
X	Is the impropriety or inadequacy associated with NRC regulated activities or policy (e.g. SCWE)?		
X	Is the validity of the issue unknown?		
If all of the above statements are checked, the issue is an allegation.			
*Technical Staff Recommendation(s)			
Date	Recommended Action	Assigned Branch	Planned Date
06/21/10	RFI	ACES/RPBD	
06/21/10	RPBD review response	RPBD	
★ NOTE: Attach Draft NOV, RFI questions/requests, and/or an inspection plan as a separate document.			
★ RFI discussed & determined ACCEPTABLE by the ARB?			
YES	X	No	N/A
Document the INHIBITING FACTOR(S) in the ARB Decision(s) if not noted on first page. Document any INHIBITING FACTOR(S) that are overruled; provide ARB Justification/Reason why overruled.			
ARB Date	ARB Decision(s)	Assigned to	Accepted Planned Date
6/29/10	RFI letter to licensee	ACES/RPBD	7/6/10
6/29/10	RPBD review response	RPBD	

* See R:\ACES\ALLEGATIONS\ ALLEGATION FORMS\ How to fill out a BEPR.doc for Field Inputs.

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions
 FOIA- *[Signature]*

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Branch Evaluation, Plan & Recommendation Allegation Number: RIV-2010-A-0094			
Concern: <u>2.</u>			
Responsible Branch:	RPBD	*RX Code or Functional Area:	Engineering
*OI Investigation Priority:		*Discipline:	Corrective Action
*OI Priority Basis:		OI Case Number:	4-20XX-0XX
Concern: (A concern is one or two sentences.) Corrective actions associated with a degraded cell on safety-related battery 2B008 are not being tracked in the corrective action program. There is no control over completion of the corrective action.			
Concern Background, Supporting Information, & Comments: Notification NN (b)(7)(C) contained an action (Task 0002) to contact the manufacturer to make arrangements for cause analysis. This action and the NN itself were closed without any actions being completed. The battery engineer still plans to return the degraded cell to the manufacturer, but because this action is being taken outside the corrective action process, it could fall through the cracks. The notification should not have been closed until this action was completed.			
(b)(7)(C)			
Regulatory Requirement: (fill in below) 10CFR50, App. B, Crit V, Instructions – activities affecting quality shall be performed IAW instructions. SONGS instructions require CAP actions be documented & tracked in CAP.			
*Safety Significance:	<input type="checkbox"/> HIGH <input checked="" type="checkbox"/> Normal <input type="checkbox"/> N/A		
Basis: Describe the concern's safety significance (current, on going issue; level of individual(s) involved; etc.). Current event that does not require prompt regulatory response and that does not involve an immediate safety or security issue			
Check each question as applicable to this concern.			
X	Is it a declaration, statement, or assertion of impropriety or inadequacy? Is there a potential deficiency?		
X	Is the impropriety or inadequacy associated with NRC regulated activities or policy (e.g. SCWE)?		
X	Is the validity of the issue unknown?		
If all of the above statements are checked, the issue is an allegation.			
*Technical Staff Recommendation(s)			
Date	Recommended Action	Assigned Branch	Planned Date
06/21/10	RPBD inspect	RPBD	
★ NOTE: Attach Draft NOV, RFI questions/requests, and/or an inspection plan as a separate document.			
★ RFI discussed & determined ACCEPTABLE by the ARB? YES <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
Document the INHIBITING FACTOR(S) in the ARB Decision(s) if not noted on first page. Document any INHIBITING FACTOR(S) that are overruled; provide ARB Justification/Reason why overruled.			
ARB Date	ARB Decision(s)	Assigned to	Accepted Planned Date
06/29/10	RPBD inspect	RPBD	

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Branch Evaluation, Plan & Recommendation Allegation Number: RIV-2010-A-0094			
Concern: <u>3.</u>			
Responsible Branch:	RPBD	*RX Code or Functional Area:	Engineering
*OI Investigation Priority:		Corrective Action	Corrective Action
*OI Priority Basis:		OI Case Number:	4-20XX-0XX
Concern: (A concern is one or two sentences.) Potential generic implications associated with the degradation /failure of a safety-related battery are not being adequately addressed.			
Concern Background, Supporting Information, & Comments: Notification NN ^{(b)(7)(C)} contained an action (Task 0002) to contact the manufacturer to make arrangements for cause analysis to determine, in part, if the rest of the battery and/or batch is affected by this failure mechanism. This action and the NN itself were closed without any actions being completed. The failure occurred several months ago and the failure modes have still not been identified. The battery was less than a year old at the time the cell became degraded. This could be indicative of a generic issue. It has not been addressed in a timely manner.			
Regulatory Requirement: (fill in below) 10CFR50, App. B, Crit XVI, Corrective Action -Failure to evaluate cause of degradation could result in failure to correct the condition adverse to quality in a timely manner.			
*Safety Significance:	<input type="checkbox"/> HIGH	<input checked="" type="checkbox"/> Normal	<input type="checkbox"/> N/A
Basis: Describe the concern's safety significance (current, on going issue; level of individual(s) involved; etc.). Current event that does not require prompt regulatory response and that does not involve an immediate safety or security issue			
Check each question as applicable to this concern.			
X	Is it a declaration, statement, or assertion of impropriety or inadequacy? Is there a potential deficiency?		
X	Is the impropriety or inadequacy associated with NRC regulated activities or policy (e.g. SCWE)?		
X	Is the validity of the issue unknown?		
If all of the above statements are checked, the issue is an allegation.			
*Technical Staff Recommendation(s)			
Date	Recommended Action	Assigned Branch	Planned Date
06/21/10	RFI	ACES/RPBD	
06/21/10	RPBD review response	RPBD	
★ NOTE: Attach Draft NOV, RFI questions/requests, and/or an inspection plan as a separate document.			
★ RFI discussed & determined ACCEPTABLE by the ARB?			
	YES	X	No
	N/A		
Document the INHIBITING FACTOR(S) in the ARB Decision(s) if not noted on first page. Document any INHIBITING FACTOR(S) that are overruled; provide ARB Justification/Reason why overruled.			
ARB Date	ARB Decision(s)	Assigned to	Accepted Planned Date
06/29/10	RFI Letter to licensee	ACES/RPBD	07/06/10
06/29/10	RPBD review response	RPBD	

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RIV-2010-A-0094 RFI Questions

A concern has been raised about the actions that have not been taken to address the failure/degradation of cell # 13 in safety-related battery 2B008. NN (b)(7)(C) was created on (b)(7)(C) to document questions raised by the NRC resident inspector related, in part, to "old pilot cell # 13." The inspector asked why the jar containing the degraded cell # 13 is still on the rack and not shipped to the manufacturer for Failure Analysis.

1. What actions have been taken, or are planned, to identify the cause of the degradation/failure of cell # 13? When will these actions be implemented and completed?
2. Considering the cells in battery 2B008 were less than 1 year old when cell # 13 was determined to be degraded and inoperable, and you have not yet determined the cause of the failure, what is your assessment of the operability and reliability of the remaining cells? What is your basis for this assessment?
3. What documentation is tracking the actions related to this failure? Is this in accordance with station procedures?
4. Are the timeliness and documentation of actions to address the failure/degradation of cell # 13 consistent with SCE management expectations?