



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

July 30, 2015

Mr. Eric McCartney  
Site Vice President  
NextEra Energy Point Beach, LLC  
6610 Nuclear Road  
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 NRC INTEGRATED  
INSPECTION REPORT 05000266/2015002; 05000301/2015002

Dear Mr. McCartney:

On June 30, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Point Beach Nuclear Plant, Units 1 and 2. The enclosed report documents the results of this inspection, which were discussed on July 9, 2015, with Mr. D. DeBoer and other members of your staff.

Based on the results of this inspection, one NRC-identified and one self-revealed finding of very low safety significance were identified. The findings involved violations of NRC requirements. Additionally, one licensee identified violation is listed in Section 4OA7. However, because of their very low safety significance, and because the issues were entered into your corrective action program (CAP), the NRC is treating the issues as non-cited violations (NCVs) in accordance with Section 2.3.2 of the NRC Enforcement Policy.

If you contest the subject or severity of this NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission-Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Point Beach Nuclear Plant. In addition, if you disagree with the cross-cutting aspect assigned to any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at the Point Beach Nuclear Plant.

E. McCartney

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In accordance with Title 10 of the Code of Federal Regulations (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

**/RA/**

Jamnes Cameron, Chief  
Branch 4  
Division of Reactor Projects

Docket Nos. 50-266; 50-301  
License Nos. DPR-24; DPR-27

Enclosure:  
IR 05000266/2015002; 05000301/2015002  
w/Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 05000266; 05000301  
License Nos: DPR-24; DPR-27

Report No: 05000266/2015002; 05000301/2015002

Licensee: NextEra Energy Point Beach, LLC

Facility: Point Beach Nuclear Plant, Units 1 and 2

Location: Two Rivers, WI

Dates: April 1, 2015 through June 30, 2015

Inspectors: D. Oliver, Senior Resident Inspector  
K. Barclay, Resident Inspector  
B. Bartlett, Project Engineer  
J. Boettcher, Reactor Engineer  
V. Myers, Health Physicist

Approved by: J. Cameron, Chief  
Branch 4  
Division of Reactor Projects

Enclosure

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## SUMMARY OF FINDINGS

Inspection Report (IR) 05000266/2015002, 05000301/2015002; 04/01/2015–06/30/2015; Point Beach Nuclear Plant, Units 1 & 2; Fire Protection; and Maintenance Effectiveness.

This report covers a 3-month period of inspection by resident inspectors and announced baseline inspections by regional inspectors. One Green finding was identified by the inspectors and one Green finding was self-revealed. The findings were considered NCVs of NRC regulations. The significance of inspection findings is indicated by their color (i.e., greater than Green, or Green, White, Yellow, Red) and determined using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" dated June 2, 2011. Cross-cutting aspects are determined using IMC 0310, "Aspects Within the Cross-Cutting Areas" effective date December 4, 2014. All violations of NRC requirements are dispositioned in accordance with the NRC's Enforcement Policy dated February 4, 2015. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG–1649, "Reactor Oversight Process" Revision 5, dated February 2014.

### **Cornerstone: Mitigating Systems**

Green: A finding of very low safety significance and associated NCV of Technical Specification (TS) 5.4.1.h was identified by the inspectors for the failure to control transient combustible material in accordance with the licensee's Fire Protection Program requirements. Specifically, the licensee installed a power cord in the north side of the service water pump room that was subsequently extended also into the south side of the service water pump room across a transient combustible exclusion boundary with no prior evaluation. The licensee's corrective actions included immediately removing the power cord from the fire exclusion zone and standing-down the work group for a brief of the event and a review of the requirements for transient combustibles.

The inspectors determined the finding was more than minor because the failure to identify the transient combustibles was associated with the Mitigating Systems Cornerstone attribute of Protection Against External Events (Fire) and affected the cornerstone objective of preventing undesirable consequences (i.e., core damage). In accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Initial Characterization of Findings," Table 2, the inspectors determined the finding affected the Mitigating Systems cornerstone. The finding degraded fire protection defense-in-depth strategies, and the inspectors determined, using Table 3, that it could be evaluated using Appendix F, "Fire Protection Significance Determination Process." The inspectors screened the issue to Green under the Phase 1 Screening Question 1.3.B, because the inspectors assigned a "Low" degradation rating to the single cable that crossed through the exclusion zone. This finding has a cross-cutting aspect of Field Presence (H.2), in the area of human performance, because the licensee's leadership did not ensure that oversight of work activities, including contractors and supplemental personnel was provided such that nuclear safety was supported. (Section 1R05.1)

Green: A finding of very low safety significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," was self-revealed for the licensee's failure to establish measures to ensure non-conforming tantalum electrolytic capacitors that were part of an assembly and that were beyond their recommended shelf-life would not be installed in safety-related equipment in the plant.

The licensee's corrective actions included repair of the D-107 battery charger, and updating maintenance and procurement requirements with component shelf-life information.

The inspectors determined the finding was more than minor since the failure to ensure the quality of spare parts, if left uncorrected, could lead to a more significant safety concern. Specifically, the failure to control circuit boards which contained tantalum electrolytic capacitors that were beyond their shelf-life was self-revealed when the D-107 safety-related battery charger failed three days after the circuit boards were installed. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Initial Characterization of Findings," dated June 19, 2012, and Appendix A, "The Significance Determination Process for Findings At-Power," Exhibit 2, Mitigating Systems Screening Questions, dated June 19, 2012. The inspectors concluded that the finding was of very low safety significance (Green), because the inspectors answered "No" to the Mitigating Systems screening questions. This finding has a cross-cutting aspect of Change Management (H.3), in the area of Human Performance, for the licensee's failure to use a systematic process for implementing changes so that nuclear safety remained the overriding priority. (Section 1R12.1)

#### **Licensee-Identified Violations**

A violation of very low safety or security significance that was identified by the licensee has been reviewed by the NRC. Corrective actions taken or planned by the licensee have been entered into the licensee's CAP. This violation and CAP tracking numbers are listed in Section 4OA7 of this report.

## **REPORT DETAILS**

### **Summary of Plant Status**

#### **Unit 1**

The unit operated at or near full power for the inspection period, except for brief power reductions to conduct planned maintenance and surveillance activities with one exception:

On May 1, 2015, the licensee reduced power to approximately 84 percent power after receiving a low suction pressure alarm for the steam generator feed pumps. The cause of the low suction pressure was the result of a failure of the unit 1 heater drain tank level control system and the subsequent secondary perturbation. The licensee repaired the heater drain level control system and returned to full power on May 2, 2015.

#### **Unit 2**

The unit operated at or near full power for the inspection period, except for brief power reductions to conduct planned maintenance and surveillance activities with two exceptions:

On April 15, 2015 and April 20, 2015, the licensee reduced power to approximately 97 percent power after receiving a low suction pressure alarm for the steam generator feed pumps. The cause of the low suction pressure was a failure of the 5B Feedwater (FW) heater drain valve to control level with a subsequent secondary plant perturbation. The licensee returned the unit to full power the same day in each case. The FW heater drain positioner was repaired on April 20, 2015.

### **1. REACTOR SAFETY**

#### **Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity**

#### **1R01 Adverse Weather Protection (71111.01)**

##### **.1 Readiness of Offsite and Alternate Alternating Current Power Systems**

##### **a. Inspection Scope**

The inspectors verified that plant features and procedures for operation and continued availability of offsite and alternate alternating current (AC) power systems during adverse weather were appropriate. The inspectors reviewed the licensee's procedures affecting these areas and the communications protocols between the transmission system operator (TSO) and the plant to verify that the appropriate information was being exchanged when issues arose that could impact the offsite power system. The inspectors performed a walkdown of the switchyard with members of the licensee's staff in order to assess equipment condition. Examples of aspects considered in the inspectors' review included:

- coordination between the TSO and the plant during off-normal or emergency events;
- estimates of when the offsite power system would be returned to a normal state; and

- notifications from the TSO to the plant when the offsite power system was returned to normal.

The inspectors also verified that plant procedures addressed measures to monitor and maintain availability and reliability of both the offsite AC power system and the onsite alternate AC power system prior to or during adverse weather conditions. Specifically, the inspectors verified that the procedures addressed the following:

- actions to be taken when notified by the TSO that the post-trip voltage of the offsite power system at the plant would not be acceptable to assure the continued operation of the safety-related loads without transferring to the onsite power supply;
- re-assessment of plant risk based on maintenance activities which could affect grid reliability, or the ability of the transmission system to provide offsite power; and
- communications between the plant and the TSO when changes at the plant could impact the transmission system, or when the capability of the transmission system to provide adequate offsite power was challenged.

The inspectors also reviewed CAP items to verify that the licensee was identifying adverse weather issues at an appropriate threshold and entering them into their CAP in accordance with station corrective action procedures. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one readiness of offsite and alternate AC power systems sample as defined in Inspection Procedure (IP) 71111.01–05.

b. Findings

No findings were identified.

1R04 Equipment Alignment (71111.04)

.1 Quarterly Partial System Walkdowns

a. Inspection Scope

The inspectors performed partial system walkdowns of the following risk-significant systems:

- Unit 1 safety injection (SI) system train A after testing;
- diesel-driven fire pump alignment with motor-driven fire pump out-of-service (OOS); and
- G-01 emergency diesel generator (EDG) standby alignment during G-03 EDG two-year maintenance window.

The inspectors selected these systems based on their risk significance relative to the Reactor Safety Cornerstones at the time they were inspected. The inspectors attempted to identify any discrepancies that could impact the function of the system and, therefore, potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, Final Safety Analysis Report (FSAR), TS requirements, outstanding work orders (WOs), action requests (ARs), and the impact of ongoing work activities on



redundant trains of equipment in order to identify conditions that could have rendered the systems incapable of performing their intended functions. The inspectors also walked down accessible portions of the systems to verify system components and support equipment were aligned correctly and operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no obvious deficiencies. The inspectors also verified that the licensee had properly identified and resolved equipment alignment problems that could cause initiating events or impact the capability of mitigating systems or barriers and entered them into the CAP with the appropriate significance characterization. Documents reviewed are listed in the Attachment to this report.

These activities constituted three partial system walkdown samples as defined in IP 71111.04–05.

b. Findings

No findings were identified.

.2 Semi-Annual Complete System Walkdown

a. Inspection Scope

On April 21, 2015, the inspectors performed a complete system alignment inspection of the Auxiliary Feedwater (AFW) System to verify the functional capability of the system. This system was selected because it was considered both safety significant and risk-significant in the licensee's probabilistic risk assessment. The inspectors walked down the system to review mechanical and electrical equipment lineups; electrical power availability; system pressure and temperature indications, as appropriate; component labeling; component lubrication; component and equipment cooling; hangers and supports; operability of support systems; and to ensure that ancillary equipment or debris did not interfere with equipment operation. A review of a sample of past and outstanding WOs was performed to determine whether any deficiencies significantly affected the system function. In addition, the inspectors reviewed the CAP database to ensure that system equipment alignment problems were being identified and appropriately resolved. Documents reviewed are listed in the Attachment to this report.

These activities constituted one complete system walkdown sample as defined in IP 71111.04–05.

b. Findings

1) Auxiliary Feedwater Pump Trip Time Delay Relay Installed Past Evaluated Service Life

Introduction: During the performance of the semi-annual full system lineup inspection sample, the inspectors identified an Unresolved Item (URI) associated with the Unit 2 turbine-driven AFW pump low suction pressure trip time delay relay potentially being past its design service life.

Description: During the inspector's review of corrective actions associated with an AFW full system alignment, the inspectors identified a URI associated with a time delay relay that potentially exceeded its design and evaluated maximum service life.

The inspectors determined that this was an issue of concern in which more information was needed to determine whether a performance deficiency exists. Specifically, after the inspectors pointed out that the time delay relays were installed beyond the licensee's documented evaluation for service life extension, the licensee further extended the relays' service life based on historical plant testing. The inspectors needed to evaluate whether the information provided by the licensee was sufficient to provide a technically defensible basis for the additional service life extension. The issue is unresolved pending further agency review of the licensee's evaluation (**URI 05000301/2015002-01, Auxiliary Feedwater Pump Trip Time Delay Relay Installed Past Evaluated Service Life**).

1R05 Fire Protection (71111.05)

.1 Routine Resident Inspector Tours (71111.05Q)

a. Inspection Scope

The inspectors conducted fire protection walkdowns which were focused on availability, accessibility, and the condition of firefighting equipment in the following risk-significant plant areas:

- Fire Zone 101: valve pit/sump pump room;
- Fire Zones 104 and 105: residual heat removal pump rooms 1P10A and 1P10B;
- Fire Zones 108 and 109: residual heat removal pump rooms 2P10A and 2P10B; and
- Fire Zone 164: charging pump room 2P2B.

The inspectors reviewed areas to assess if the licensee had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant, effectively maintained fire detection and suppression capability, maintained passive fire protection features in good material condition, and implemented adequate compensatory measures for OOS, degraded or inoperable fire protection equipment, systems, or features in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall contribution to internal fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to impact equipment which could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the Attachment to this report, the inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use; that fire detectors and sprinklers were unobstructed; that transient material loading was within the analyzed limits; and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's CAP. Documents reviewed are listed in the Attachment to this report.

These activities constituted four quarterly fire protection inspection samples as defined in IP 71111.05-05.

b. Findings

1) Failure to Control Transient Combustibles During Service Water Pumphouse Maintenance

Introduction: A finding of very low safety significance (Green) and associated NCV of TS 5.4.1.h was identified by the inspectors for the failure to control transient combustible material in accordance with the licensee's Fire Protection Program requirements. Specifically, the licensee installed a power cord in the north side of the service water pump room that was subsequently extended also into the south side of the service water pump room across a transient combustible exclusion boundary with no prior evaluation.

Description: On May 28, 2015, during a plant status tour of the service water pumphouse, the inspectors noted a power cord extended across a boundary wall in the service water pumphouse area. The boundary wall was clearly and recently marked as a transient combustible exclusion zone. The inspectors determined that the power cord was energized and supplying power to an overhead crane for work that was occurring in the south half of the service water pump area.

The inspectors determined that the licensee's Fire Hazards Analysis Report, Revision 4, Appendix A, Fire Hazard Analysis, contained analysis for all safe shutdown related fire areas. This analysis report for fire area A38, circulating water service water pumphouse, stated that an exemption from the 20 foot separation requirement of 10 CFR Part 50, Appendix R, Section III.G.2.b was granted on December 31, 1986 for fire zone 552, service water pump room. Point Beach Nuclear Plant Fire Protection Evaluation Report, Revision 14, Table 5.2.6-1, exemption number 14 stated that the licensee's commitments and requirements resulting from the NRC granted exemption included providing a partial-height noncombustible radiant energy heat shield that separated the service water pumps into two groups, and that no intervening combustibles were to be routed over the partial-height barrier.

Furthermore, paragraph '3' of the Fire Hazards Analysis Report analysis for fire area A38 stated that the service water pumps were separated into two groups of three by a six foot high, one-hour rated wall. Two service water pumps are required for hot and cold shutdown for both units, and that no intervening combustibles are routed across the barrier. The inspectors determined that this ensures that two service water pumps remain available for a fire in this area, thus meeting the requirements for the December 31, 1986 NRC granted exemption.

The inspectors concluded that licensee Nuclear Procedure (NP) 1.9.9, "Transient Combustible Control," Revision 26, Section 2.10 stated, in part, that no transient combustible material was allowed in combustible exclusion zones without specific evaluation and the approval of the fire protection engineer. The combustible exclusion areas were further defined in Section 2.10 which included, "service water pumps (fire zone 552) between the north and south sections separated by a partial wall" and referenced the above described exemption. The inspectors determined that no evaluation was conducted by fire protection engineers to allow for deviation from this exemption.

Analysis: The inspectors determined that failure to identify transient combustibles in a transient combustible exclusion zone was contrary to the licensee's Fire Protection

Evaluation Report and was a performance deficiency. The finding was determined to be more than minor because the failure to identify the transient combustibles was associated with the Mitigating Systems Cornerstone attribute of Protection Against External Events (Fire) and affected the cornerstone objective of preventing undesirable consequences (i.e., core damage).

In accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Initial Characterization of Findings," Table 2, the inspectors determined the finding affected the Mitigating Systems cornerstone. The finding degraded fire protection defense-in-depth strategies, and the inspectors determined, using Table 3, that it could be evaluated using Appendix F, "Fire Protection Significance Determination Process." The inspectors screened the issue to Green under the Phase 1 Screening Question 1.3.B, because the inspectors assigned a "Low" degradation rating to the single cable that crossed through the exclusion zone.

This finding has a cross-cutting aspect of Field Presence (H.2), in the area of human performance, because the licensee's leadership did not ensure that oversight of work activities, including contractors and supplemental personnel was provided such that nuclear safety was supported. Specifically, the licensee did not ensure that contracted individuals were aware of the licensee's standards for transient combustible control during the use of the service water pumphouse overhead crane.

Enforcement: The licensee's TS 4.1.h for Units 1 and 2 required that written procedures be established, implemented, and maintained, covering activities related to Fire Protection Program implementation. NP 1.9.9, "Transient Combustible Control," Revision 23, Section 2.10 stated, in part, that no transient combustible material is allowed in combustible exclusion zones without specific evaluation and the approval of the fire protection engineer.

Contrary to the above, on May 28, 2015, the licensee failed to implement the guidelines specified in Procedure NP-1.9.9 an energized power cord supplying power to the service water pump room overhead crane, a transient intervening combustible and an ignition source, was located across a combustion exclusion zone in that area. Because this violation was of very low safety significance and it was entered into the licensee's CAP as AR 02048713 and AR 02050899, this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy. The licensee's corrective actions included immediately removing the power cord from the fire exclusion zone and standing-down the work group for a brief of the event and a review of the requirements in NP 1.9.9.

**(NCV 05000266/2015002-02; 05000301/2015002-02, Failure to Control Transient Combustibles During Service Water Pumphouse Maintenance).**

1R11 Licensed Operator Regualification Program (71111.11)

.1 Resident Inspector Quarterly Review of Licensed Operator Regualification (71111.11Q)

a. Inspection Scope

On June 23, 2015, the inspectors observed crew E licensed operators in the plant's simulator during licensed operator regualification training to verify that operator performance was adequate, evaluators were identifying and documenting crew

performance problems and training was being conducted in accordance with licensee procedures. The inspectors evaluated the following areas:

- licensed operator performance;
- crew's clarity and formality of communications;
- ability to take timely actions in the conservative direction;
- prioritization, interpretation, and verification of annunciator alarms;
- correct use and implementation of abnormal and emergency procedures;
- control board manipulations;
- oversight and direction from supervisors; and
- ability to identify and implement appropriate TS actions and Emergency Plan actions and notifications.

The crew's performance in these areas was compared to pre-established operator action expectations and successful critical task completion requirements. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one quarterly licensed operator requalification program simulator sample as defined in IP 71111.11-05.

b. Findings

No findings were identified.

.2 Resident Inspector Quarterly Observation During Periods of Heightened Activity or Risk (71111.11Q)

a. Inspection Scope

- On April 7, 2015, the inspectors observed the performance of train B low head SI pumps and valves in-service testing on Unit 2 from the main control room by licensed operators;
- On May 1, 2015, the inspectors observed the actions of operators from the control room during multiple FW system transients on Unit 1 due to a malfunction of the heater drain level control system; and
- On May 22, 2015, the inspectors observed the actions of operators from the control room during a failure of the Unit 1 white channel over-temperature-delta-temperature instrumentation.

These were activities that required heightened awareness and were related to increased risk. The inspectors evaluated the following areas:

- licensed operator performance;
- crew's clarity and formality of communications;
- ability to take timely actions in the conservative direction;
- prioritization, interpretation, and verification of annunciator alarms (if applicable);
- correct use and implementation of procedures;
- control board (or equipment) manipulations;
- oversight and direction from supervisors; and
- ability to identify and implement appropriate TS actions and Emergency Plan actions and notifications (if applicable).

The performance in these areas was compared to pre-established operator action expectations, procedural compliance and task completion requirements. Documents reviewed are listed in the Attachment to this report.

This inspection constituted three quarterly licensed operator heightened activity/risk samples as defined in IP 71111.11–05.

b. Findings

No findings were identified.

1R12 Maintenance Effectiveness (71111.12)

.1 Routine Quarterly Evaluations

a. Inspection Scope

The inspectors evaluated degraded performance issues involving the following risk-significant systems:

- safety-related battery charger D-107 firing circuit card A1A failure;
- standby steam generator feed system air operated valve controller PC-4019; and
- Unit 1 white channel over-temperature-delta-temperature instrumentation failure.

The inspectors reviewed events such as where ineffective equipment maintenance had or could have resulted in valid or invalid automatic actuations of engineered safeguards systems and independently verified the licensee's actions to address system performance or condition problems in terms of the following:

- implementing appropriate work practices;
- identifying and addressing common cause failures;
- scoping of systems in accordance with 10 CFR 50.65(b) of the maintenance rule;
- characterizing system reliability issues for performance;
- charging unavailability for performance;
- trending key parameters for condition monitoring;
- ensuring 10 CFR 50.65(a)(1) or (a)(2) classification or re-classification; and
- verifying appropriate performance criteria for structures, systems, and components (SSCs)/functions classified as (a)(2), or appropriate and adequate goals and corrective actions for systems classified as (a)(1).

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the system. In addition, the inspectors verified maintenance effectiveness issues were entered into the CAP with the appropriate significance characterization. Documents reviewed are listed in the Attachment to this report.

This inspection constituted three quarterly maintenance effectiveness samples as defined in IP 71111.12–05.

b. Findings

1) Inadequate Measures to Control Spare Firing Card Assemblies

Introduction: A finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," was self-revealed for the licensee's failure to establish measures to ensure non-conforming tantalum electrolytic capacitors that were part of an assembly and that were beyond their recommended shelf-life would not be installed in safety-related equipment in the plant.

Description: On March 23, 2015, the licensee observed abnormal noise and vibration originating from safety-related battery charger D-107. The licensee conducted phase current measurements from each of the three input power phases to the battery charger and determined that a current imbalance existed due to one phase current being substantially lower than the other two phases. The licensee declared the battery charger inoperable and removed it from service. The licensee's subsequent troubleshooting revealed that one of the three circuit cards, firing card A1A, that provided a signal to associated circuits for the proper regulation of AC to direct current (DC) had failed. This card and several other components were recently replaced during a 10-year maintenance activity which concluded when the charger was returned to service on March 20, 2015.

The licensee determined that the cause of the failure of the A1A firing card was due to the failure to reform a factory installed tantalum-type electrolytic capacitor on the card. Capacitor reforming refers to the process of reconditioning certain types of electrolytic capacitors after they have exceeded their shelf-life prior to installation and in-service use. The replacement circuit cards had been in ready stores, available as replacement components since the licensee purchased them on March 10, 2006. The licensee's procedure FP-E-CAP-01, "Electrolytic Capacitor Aging Management," stated that the shelf-life of stocked circuit boards that contain electrolytic capacitors shall be tracked, and that a method shall be established to ensure that critical spares are tagged to ensure that they are not installed in-service without first verifying that electrolytic capacitors are less than 5 years old. Equipment containing older electrolytic capacitors should either have the capacitor replaced if possible, or have a documented justification for acceptable use. Furthermore, FP-E-CAP-01 stated that, in most cases, an extended bench burn-in is recommended, which was also not performed. At the time of installation no written justification existed to allow for exceeding the 5 year shelf-life requirement. Inspectors determined that the licensee used the In-Service Preventative Maintenance Program (ISPM) to manage shelf and operating life requirements. The ISPM had assigned tracking codes to manage the maintenance of the boards as ready spares which included evaluations that specified that a 5 year reforming requirement should have been established. The inspectors concluded that the licensee did not either perform capacitor reforming for these circuit cards or reject the parts as no longer being in conformance to quality standards prior to their installation.

Analysis: The inspectors determined that failure to control the shelf-life for spare parts for safety-related battery chargers was contrary to 10 CFR Part 50, Appendix B, Criterion XV, and was a performance deficiency. The inspectors determined the finding was more than minor since the failure to ensure the quality of spare parts, if left uncorrected, could lead to a more significant safety concern. Specifically, the failure to

control circuit boards which contained tantalum electrolytic capacitors that were beyond their shelf-life was self-revealed when the D-107 safety-related battery charger failed three days after the circuit boards were installed.

The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Initial Characterization of Findings," dated June 19, 2012, and Appendix A, "The Significance Determination Process for Findings At-Power," Exhibit 2, Mitigating Systems Screening Questions, dated June 19, 2012. The inspectors concluded that the finding was of very low safety significance (Green), because the inspectors answered "No" to the Mitigating Systems screening questions. This finding has a cross-cutting aspect of Change Management (H.3), in the area of Human Performance, for the licensee's failure to use a systematic process for implementing changes so that nuclear safety remained the overriding priority. Specifically, the licensee removed these components from the licensee's shelf-life monitoring program in favor of the ISPM, but failed to preserve the original dates of procurement with the change. This prevented the automatic generation of a WO that would have required the reforming of the tantalum electrolytic capacitors at the proper interval.

Enforcement: Title 10 CFR Part 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components," requires, in part, that measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition, and notification to affected organizations.

Contrary to the above, on March 23, 2015, the licensee failed to establish measures to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. Specifically, the licensee failed to take measures to prevent the installation of nonconforming electrolytic capacitors that were part of the A1A firing card for the D-107 safety-related battery charger. The capacitor failed, rendering the battery charger inoperable. The failed capacitor was non-conforming to requirements because it was beyond its vendor-recommended shelf-life when the licensee installed the firing card on March 20, 2015, 3-days earlier. The licensee's failure analysis concluded that the cause was due to a shelf-life age-related mechanism that was preventable.

Because this violation was of very low safety significance and the licensee entered it into the CAP as AR 02034471 and AR 02050295, it is being treated as a NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy. The licensee's corrective actions included repair of the D-107 battery charger, and updating maintenance and procurement requirements with component shelf-life information.

**(NCV 05000266/2015002-03; 05000301/2015002-03, Inadequate Measures to Control Spare Firing Card Assemblies).**



1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13)

.1 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

The inspectors reviewed the licensee's evaluation and management of plant risk for the maintenance work activities affecting risk-significant and safety-related equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- April 28, 2015; G-03 EDG OOS with motor-driven fire pump unavailable;
- May 18, 2015; G-01/G-02 EDG unavailable with condensate storage tank (CST) modifications in-progress;
- May 19, 2015; 1P-29/2P-29 Turbine Driven AFW pumps unavailable with CST modifications in-progress;
- May 20, 2015; K-2A Instrument Air Compressor OOS, steam dump MS-2054 unavailable, with CST modifications in-progress; and
- May 27, 2015; 1P-11B component cooling water (CCW) pump and diesel-driven fire pump unavailability with switchyard maintenance in-progress.

These activities were selected based on their potential risk significance relative to the Reactor Safety Cornerstones. As applicable for each activity, the inspectors verified that risk assessments were performed as required by 10 CFR 50.65(a)(4) and were accurate and complete. When emergent work was performed, the inspectors verified that the plant risk was promptly reassessed and managed. The inspectors reviewed the scope of maintenance work and verified plant conditions were consistent with the risk assessment. The inspectors also reviewed TS requirements and walked down portions of selected redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met. Documents reviewed during this inspection are listed in the Attachment to this report.

These maintenance risk assessments and emergent work control activities constituted five samples as defined in IP 71111.13-05.

b. Findings

No findings were identified.

1R15 Operability Determinations and Functional Assessments (71111.15)

.1 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the following issues:

- AR 02042698; functionality assessment for 1MS-2027; Unit 1 right-hand turbine stop valve;
- POD 02024305; no isolation between safety and non safety-related components;

- POD 02024530; pitting on the gasket surface of Unit 2 CCW heat exchanger 12D; and
- POR 02034471; D-107 charger noise and vibration.

The inspectors selected these potential operability issues based on the risk significance of the associated components and systems. The inspectors evaluated the technical adequacy of the evaluations to ensure that TS operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the TS and FSAR to the licensee's evaluations to determine whether the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations. Additionally, the inspectors reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations. Documents reviewed are listed in the Attachment to this report.

This operability inspection constituted four samples as defined in IP 71111.15–05.

b. Findings

No findings were identified.

1R18 Plant Modifications (71111.18)

.1 Plant Modifications

a. Inspection Scope

The inspectors reviewed the following modification:

- OP-2A procedure change.

The inspectors reviewed the configuration changes and associated 10 CFR 50.59 safety evaluation screening against the design basis, the FSAR, and the TS, as applicable, to verify that the modification did not affect the operability or availability of the affected system(s). The inspectors, as applicable, observed ongoing and completed work activities to ensure that the modification was implemented as directed and consistent with the design control documents; the modification operated as expected; post-modification testing adequately demonstrated continued system operability, availability, and reliability; and that operation of the modifications did not impact the operability of any interfacing systems. As applicable, the inspectors verified that relevant procedure, design, and licensing documents were properly updated. Lastly, the inspectors discussed the plant modification with operations, engineering, and training personnel to ensure that the individuals were aware of how the operation with the plant modification in place could impact overall plant performance. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one permanent plant modification sample as defined in IP 71111.18–05.

b. Findings

No findings were identified.

1R19 Post-Maintenance Testing (71111.19)

.1 Post-Maintenance Testing

a. Inspection Scope

The inspectors reviewed the following post-maintenance activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

- 1P-11B CCW pump functional run after oil change and coupling greasing;
- 1P-53 AFW pump operation following a breaker replacement and oil change;
- K-2A air compressor operation after maintenance;
- TS 87; Primary Auxiliary Building Ventilation System Monthly Checks following primary auxiliary building exhaust filter fan motor replacement; and
- IT 90 Train B; Atmospheric Steam Dump Valve Train B Unit 1 following maintenance.

These activities were selected based upon the SSC's ability to impact risk. The inspectors evaluated these activities for the following (as applicable): the effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed; acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate; tests were performed as written in accordance with properly reviewed and approved procedures; equipment was returned to its operational status following testing (temporary modifications or jumpers required for test performance were properly removed after test completion); and test documentation was properly evaluated. The inspectors evaluated the activities against TSs, the FSAR, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications to ensure that the test results adequately ensured that the equipment met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with post-maintenance tests to determine whether the licensee was identifying problems and entering them in the CAP and that the problems were being corrected commensurate with their importance to safety. Documents reviewed are listed in the Attachment to this report.

This inspection constituted five post-maintenance testing (PMT) samples as defined in IP 71111.19-05.

b. Findings

No findings were identified.

## 1R22 Surveillance Testing (71111.22)

### .1 Surveillance Testing

#### a. Inspection Scope

The inspectors reviewed the test results for the following activities to determine whether risk-significant systems and equipment were capable of performing their intended safety function and to verify testing was conducted in accordance with applicable procedural and TS requirements:

- IT 07G; Service Water Valves Quarterly (Routine);
- PC 43 Part 5; Service Water to Auxiliary Feedwater Pump Line Flush Monthly (Routine);
- IT 04 Train B; Low Head Safety Injection Pumps and Valves Train B Unit 2 (IST); and
- OI 55; Primary Leak Rate Calculation (RCS Leakage).

The inspectors observed in-plant activities and reviewed procedures and associated records to determine the following:

- did preconditioning occur;
- the effects of the testing were adequately addressed by control room personnel or engineers prior to the commencement of the testing;
- acceptance criteria were clearly stated, demonstrated operational readiness, and were consistent with the system design basis;
- plant equipment calibration was correct, accurate, and properly documented;
- as-left setpoints were within required ranges; and the calibration frequency was in accordance with TSs, the FSAR, procedures, and applicable commitments;
- measuring and test equipment calibration was current;
- test equipment was used within the required range and accuracy; applicable prerequisites described in the test procedures were satisfied;
- test frequencies met TS requirements to demonstrate operability and reliability; tests were performed in accordance with the test procedures and other applicable procedures; jumpers and lifted leads were controlled and restored where used;
- test data and results were accurate, complete, within limits, and valid;
- test equipment was removed after testing;
- where applicable for inservice testing activities, testing was performed in accordance with the applicable version of Section XI, American Society of Mechanical Engineers code, and reference values were consistent with the system design basis;
- where applicable, test results not meeting acceptance criteria were addressed with an adequate operability evaluation or the system or component was declared inoperable;
- where applicable for safety-related instrument control surveillance tests, reference setting data were accurately incorporated in the test procedure;
- where applicable, actual conditions encountering high resistance electrical contacts were such that the intended safety function could still be accomplished;

- prior procedure changes had not provided an opportunity to identify problems encountered during the performance of the surveillance or calibration test;
- equipment was returned to a position or status required to support the performance of its safety functions; and
- all problems identified during the testing were appropriately documented and dispositioned in the CAP.

Documents reviewed are listed in the Attachment to this report.

This inspection constituted two routine surveillance testing samples, one in-service test sample, and one reactor coolant system (RCS) leak detection inspection sample as defined in IP 71111.22, Sections—02 and—05.

b. Findings

No findings were identified.

## 2. **RADIATION SAFETY**

### **Cornerstones: Public Radiation Safety and Occupational Radiation Safety**

#### 2RS7 Radiological Environmental Monitoring Program (71124.07)

##### .1 Inspection Planning (02.01)

##### a. Inspection Scope

The inspectors reviewed the annual radiological environmental operating reports and the results of any licensee assessments since the last inspection to assess whether the radiological environmental monitoring program was implemented in accordance with the TS and Offsite Dose Calculation Manual (ODCM). This review included reported changes to the ODCM with respect to environmental monitoring, commitments in terms of sampling locations, monitoring and measurement frequencies, land use census, inter-laboratory comparison program, and analysis of data.

The inspectors reviewed the ODCM to identify locations of environmental monitoring stations.

The inspectors reviewed the FSAR for information regarding the environmental monitoring program and meteorological monitoring instrumentation.

The inspectors reviewed quality assurance audit results of the program to assist in choosing inspection “smart samples”. The inspectors also reviewed audits and technical evaluations performed on the vendor laboratory, if used.

The inspectors reviewed the annual effluent release report and 10 CFR Part 61, “Licensing Requirements for Land Disposal of Radioactive Waste,” report, to determine if the licensee was sampling, as appropriate, for the predominant and dose-causing radionuclides likely to be released in effluents.

This inspection constituted one complete sample as defined in IP 71124.07-05.

b. Findings

No findings were identified.

.2 Site Inspection (02.02)

a. Inspection Scope

The inspectors walked down select air sampling stations and dosimeter monitoring stations to determine whether they were located as described in the ODCM and to determine the equipment material condition. Consistent with smart sampling, the air sampling stations were selected based on the locations with the highest X/Q, D/Q wind sectors, and dosimeters were selected based on the most risk-significant locations (e.g., those that have the highest potential for public dose impact).

For the air samplers and dosimeters selected, the inspectors reviewed the calibration and maintenance records to evaluate whether they demonstrated adequate operability of these components. Additionally, the review included the calibration and maintenance records of select composite water samplers.

The inspectors assessed whether the licensee had initiated sampling of other appropriate media upon loss of a required sampling station.

The inspectors observed the collection and preparation of environmental samples from different environmental media (e.g., ground and surface water, milk, vegetation, sediment, and soil) as available to determine if environmental sampling was a representative of the release pathways as specified in the ODCM, and if sampling techniques were in accordance with procedures.

Based on direct observation and review of records, the inspectors assessed whether the meteorological instruments were operable, calibrated, and maintained in accordance with guidance contained in the FSAR, NRC Regulatory Guide 1.23, "Meteorological Monitoring Programs for Nuclear Power Plants," and licensee procedures. The inspectors assessed whether the meteorological data readout and recording instruments in the control room, and if applicable, at the tower, were operable.

The inspectors evaluated whether missed and/or anomalous environmental samples were identified and reported in the annual environmental monitoring report. The inspectors selected events that involved a missed sample, inoperable sampler, lost dosimeter, or anomalous measurement to determine if the licensee had identified the cause and had implemented corrective actions. The inspectors reviewed the licensee's assessment of any positive sample results (i.e., licensed radioactive material detected above the lower limits of detection) and reviewed the associated radioactive effluent release data that was the source of the released material.

The inspectors selected SSCs that involve or could reasonably involve licensed material for which there is a credible mechanism for licensed material to reach ground water. The inspectors also assessed whether the licensee had implemented a sampling and monitoring program sufficient to detect leakage of these SSCs to ground water.

The inspectors evaluated whether records of leaks, spills, and remediation, as required by 10 CFR 50.75(g), since the previous inspection were retained in a retrievable manner.

The inspectors reviewed any significant changes made by the licensee to the ODCM as the result of changes to the land census, long-term meteorological conditions (3-year average), or modifications to the sampler stations since the last inspection. They reviewed technical justifications for any changed sampling locations to evaluate whether the licensee performed the reviews required to ensure that the changes did not affect its ability to monitor the impacts of radioactive effluent releases on the environment.

The inspectors assessed whether the appropriate detection sensitivities with respect to TS/ODCM were used for counting samples (i.e., the samples meet the TS/ODCM required lower limits of detection). The licensee uses a vendor laboratory to analyze the radiological environmental monitoring program samples; therefore, the inspectors reviewed the results of the vendor's quality control program, including the interlaboratory comparison to assess the adequacy of the vendor's program.

The inspectors reviewed the results of the licensee's interlaboratory comparison program to evaluate the adequacy of environmental sample analyses performed by the licensee. The inspectors assessed whether the interlaboratory comparison test included the media/nuclide mix appropriate for the facility. If applicable, the inspectors reviewed the licensee's determination of any bias to the data and the overall effect on the radiological environmental monitoring program.

b. Findings

No findings were identified.

.3 Identification and Resolution of Problems (02.03)

a. Inspection Scope

The inspectors assessed whether problems associated with the radiological environmental monitoring program were being identified by the licensee at an appropriate threshold and were properly addressed for resolution in the licensee's CAP. Additionally, they assessed the appropriateness of the corrective actions for a selected sample of problems documented by the licensee that involved the radiological environmental monitoring program.

b. Findings

No findings were identified.

#### 4. OTHER ACTIVITIES

##### **Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Public Radiation Safety, and Occupational Radiation Safety**

##### 4OA1 Performance Indicator Verification (71151)

###### .1 Reactor Coolant System Leakage

###### a. Inspection Scope

The inspectors sampled licensee submittals for the RCS Leakage performance indicator (PI) for Point Beach Nuclear Plant, Units 1 and 2, for the period from the first quarter 2014 through the first quarter 2015. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, dated August 31, 2013, were used. The inspectors reviewed the licensee's operator logs, RCS leakage tracking data, issue reports, event reports and NRC Integrated IRs to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the PI data collected or transmitted for this indicator and none were identified. Documents reviewed are listed in the Attachment to this report.

This inspection constituted two reactor coolant system leakage samples as defined in IP 71151-05.

###### b. Findings

No findings were identified.

##### 4OA2 Identification and Resolution of Problems (71152)

###### .1 Routine Review of Items Entered into the Corrective Action Program

###### a. Inspection Scope

As part of the various baseline IPs discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify they were being entered into the licensee's CAP at an appropriate threshold, that adequate attention was being given to timely corrective actions, and that adverse trends were identified and addressed. Attributes reviewed included: identification of the problem was complete and accurate; timeliness was commensurate with the safety significance; evaluation and disposition of performance issues, generic implications, common causes, contributing factors, root causes, extent-of-condition reviews, and previous occurrences reviews were proper and adequate; and that the classification, prioritization, focus, and timeliness of corrective actions were commensurate with safety and sufficient to prevent recurrence of the issue. Minor issues entered into the licensee's CAP as a result of the inspectors' observations are included in the Attachment to this report.

These routine reviews for the identification and resolution of problems did not constitute any additional inspection samples. Instead, by procedure they were considered an



integral part of the inspections performed during the quarter and documented in Section 1 of this report.

b. Findings

No findings were identified.

.2 Daily Corrective Action Program Reviews

a. Inspection Scope

In order to assist with the identification of repetitive equipment failures and specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into the licensee's CAP. This review was accomplished through inspection of the station's daily condition report packages.

These daily reviews were performed by procedure as part of the inspectors' daily plant status monitoring activities and, as such, did not constitute any separate inspection samples.

b. Findings

No findings were identified.

.3 Selected Issue Follow-Up Inspection: Grease Stains on the Exterior Surface of Containment

a. Inspection Scope

During routine plant tours the inspectors observed large areas of the exterior of the two containment buildings with grease stains. The inspectors assessed the licensee's knowledge of these stains and the implementation of assessments and tracking of the extent of condition.

The licensee informed the inspectors that the containment stains were from grease that was used to fill the containment pre-stressing system. The grease was used to keep the steel tendons in a low corrosion environment and was originally sufficiently low viscosity that some portion migrated through minute crevices to the exterior surface. The steel tendons are located partway through the containment concrete and are used to maintain the containments in a compressed state. Sometime after plant startup, grease with a higher viscosity was used and the containment grease stains did not grow as fast.

The inspectors verified that the licensee was aware of the grease stains, was monitoring them for growth and had determined that the organic compounds of the grease would not present short term or long term risks to the concrete. The inspectors determined that while there was some government and industry literature available regarding grease – concrete interactions; the licensee had not evaluated the literature for its applicability to their containment structures. In addition, assessments in licensee ARs regarding grease-concrete interaction were usually limited to one or two sentences and did not ensure that a knowledgeable reader could verify that there was not an adverse impact.

As a result of the inspector's inquiries, the licensee added additional information to ARs regarding grease-concrete interaction to ensure that a knowledgeable reader could verify that there was no adverse impact.

This review constituted one in-depth problem identification and resolution sample as defined in IP 71152-05.

b. Findings

No findings were identified.

.4 Semi-Annual Trend Review

a. Inspection Scope

The inspectors performed a review of the licensee's CAP and associated documents to identify trends that could indicate the existence of a more significant safety issue. The inspectors' review was focused on repetitive equipment issues, but also considered the results of daily inspector CAP item screening discussed in Section 4OA2.2 above, licensee trending efforts, and licensee human performance results. The inspectors' review nominally considered the 6-month period of January 1, 2015 through June 30, 2015, although some examples expanded beyond those dates where the scope of the trend warranted.

The review also included issues documented outside the normal CAP in major equipment problem lists, repetitive and/or rework maintenance lists, departmental problem/challenges lists, system health reports, quality assurance audit/surveillance reports, self-assessment reports, and Maintenance Rule assessments. The inspectors compared and contrasted their results with the results contained in the licensee's CAP trending reports. Corrective actions associated with a sample of the issues identified in the licensee's trending reports were reviewed for adequacy.

This review constituted one semi-annual trend inspection sample as defined in IP 71152-05.

Observations: During the course of the review period for this inspection sample, the inspectors noted several recent examples where the licensee's corrective actions failed to demonstrate that the decisions supporting or affecting nuclear safety were systematic, rigorous, and thorough. In all cases, the issues in question were low-level events and were minor deficiencies. Specific examples associated with this trend included, but were not limited to:

- Battery Charger D-107; Failure to enter TS Limiting Condition for Operation (LCO) 3.8.4: On March 23, 2015 at 1645 hours, abnormal noise and vibration was reported as being generated by the licensee's safety-related battery charger D-107 which was supplying its associated safety-related DC bus, D-03. The licensee initiated action to investigate the cause of the noise and vibration, which included taking current measurements from each of the input phases to the charger as described in Section 1R12 above. According to the licensee's station logs, the licensee placed the D-109 swing battery charger on safety-related DC bus D-03 on March 23, 2015 at 2123, 4 hours and 38 minutes after the licensee had discovered the degraded condition. The licensee's TS LCO 3.8.4, "DC

Sources – Operating” was applicable for the plant’s operating mode (Mode 1) for both units simultaneously at that time. The licensee’s TS LCO 3.8.4 Action A.1 required restoration of the affected DC electrical power subsystem (an operable battery charger) in 2 hours, and if not met, then action B.1 applied, which was to be in Mode 3 in 6 hours, providing a total of 8 hours maximum from the time the licensee discovered the condition before both units would have been required to be shutdown. According to station logs, the licensee formally declared battery charger D-107 inoperable at 2300 on March 23, 2015 and stated that TS LCO 3.8.4 was met at that time, with no acknowledgment of the previous inoperability time;

- Battery Charger D-107; Replacement of Firing Circuit Cards: In addition to the deficiencies discussed in Section 1R12 above, after all spare firing circuit cards were exhausted from the licensee’s stock system, the licensee used the original circuit cards that had been removed initially during the beginning of the March 2015 maintenance outage for replacement. These cards were part of the original equipment that was installed since the D-107 battery charger was first installed in plant around 1985, despite the preventative maintenance procedures that required their replacement. The reinstalling of the 30-year-old circuit cards was made with no formal evaluation or documentation to justify the deviation from the licensee’s preventative maintenance schedule or procedures;
- Operating Procedure OP 2A; Normal Power Operation: On May 6, 2015, the licensee implemented a revision to this procedure to clarify direction for licensed operators on the operation of both units at or near the licensed power limit. Inspectors became concerned with language in the precautions and limitations section for pre-planned evolutions which assigned a specific parameter, namely the licensee’s 1-hour calculated rated thermal power output, which was not to be exceeded. The inspectors were concerned that this created the possibility for a situation which could allow operators to exceed the licensed power limit for short durations without taking prompt action to reduce power during preplanned evolutions. This is explicitly contrary to the industry and NRC endorsed guidance for complying with the licensed power limit;

In each of the observations above, the licensee demonstrated weaknesses in the safety culture trait of decision making and in each of the attributes described in NUREG-2165, “Safety Culture Common Language.” In the first example, the licensee’s hesitancy to take accountability and make a decision about a risk-significant safety-related system that has a fully qualified spare charger available, demonstrated reluctance to call a system inoperable. In the examples of the decision to reinstall old circuit cards without formal justification, and in the revisions to operating procedure OP 2A, the licensee was not transparent and; therefore, did not display a conservative bias in a thought out approach using conservative assumptions and consideration for long-term consequences in the resolution of problems.

b. Findings

No findings were identified.

#### 4OA6 Management Meetings

##### .1 Exit Meeting Summary

On July 9, 2015, the inspectors presented the inspection results to Mr. D. DeBoer and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

##### .2 Interim Exit Meetings

On May 22, 2015, the inspection results for the area of radiological environmental monitoring were discussed with Mr. D. DeBoer. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

#### 4OA7 Licensee-Identified Violation

The following violation of very low significance (Green) was identified by the licensee and is a violation of NRC requirements which meets the criteria of the NRC Enforcement Policy for being dispositioned as a NCV.

- Section (b) of TS 5.7.1 requires, in part, that access to—and activities in—a high-radiation area be controlled by a radiation work permit or equivalent. Section (e) of TS 5.7.1 requires, in part, that entry into HRAs be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. Contrary to the above, on April 14, 2015, an individual entered an HRA without being on a radiation work permit that allowed for HRA entry and was not made knowledgeable of the dose rates in the HRA. The licensee entered this issue into the CAP as AR 0204280. This violation is considered to be of very low safety significance in accordance with IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," dated August 19, 2008, because: (1) it did not involve as-low-as-reasonably-achievable planning or work controls; (2) there were no overexposures; (3) there was not a substantial potential for overexposures; and (4) the ability to assess dose was not compromised.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## **SUPPLEMENTAL INFORMATION**

### **KEY POINTS OF CONTACT**

#### Licensee

E. McCartney, Site Vice President  
D. DeBoer, Plant General Manager  
S. Aerts, Performance Improvement Manager  
D. Forter, Project Site Manager  
J. Golding, Engineering Supervisor  
R. Harrsch, Engineering Site Director  
B. Kopetsky, Security Site Manager  
C. Mynhier, Engineering Supervisor  
R. Parker, Chemistry Manager  
J. Pierce, Training Site Manager  
T. Schneider, Senior Engineer  
E. Schultz, Operations Assistant Manager – Line  
R. Seizert, Emergency Preparedness Manager  
G. Strharsky, Site Quality Manager  
R. Webber, Operations Site Director  
R. Welty, Radiation Protection Manager  
J. Wilson, Maintenance Site Director  
B. Woyak, Licensing Manager

#### Nuclear Regulatory Commission

J. Cameron, Chief, Reactor Projects Branch 4

## LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

### Opened

05000301/2015002-01	URI	Auxiliary Feedwater Pump Trip Time Delay Relay Installed Past Evaluated Service Life (Section 1R04.2)
05000266/2015002-02 05000301/2015002-02	NCV	Failure to Control Transient Combustibles During Service Water Pumphouse Maintenance (Section 1R05.1)
05000266/2015002-03 05000301/2015002-03	NCV	Inadequate Measures to Control Spare Firing Card Assemblies (Section 1R12.1)

### Closed

05000266/2015002-02 05000301/2015002-02	NCV	Failure to Control Transient Combustibles During Service Water Pumphouse Maintenance (Section 1R05.1)
05000266/2015002-03 05000301/2015002-03	NCV	Inadequate Measures to Control Spare Firing Card Assemblies (Section 1R12.1)

## LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

### 1R01 Adverse Weather Protection (71111.01)

- AOP 13-C; Severe Weather Conditions
- Interface Coordination Agreement with American Transmission Company; November 19, 2014
- Listing of all open CR assignments for the 345kV System
- Listing of all open CRs for the 345kV System
- NP 2.1.5; Electrical Communications, Switchyard Access and Work Planning; Revision 24
- OP 2B; 345 kV Transmission System Impacts Upon PBNP Station Operations
- OP-AA-101-1000; Clearance and Tagging; Revision 10
- OP-AA-102-1002; Seasonal Readiness; Revision 7
- Unit 1 345 kV System Health Report; First Quarter 2015
- Unit 1 4.16 kV System Health Report; First Quarter 2015
- Unit 2 345 kV System Health Report; First Quarter 2015
- Unit 2 4.16 kV System Health Report; First Quarter 2015

### 1R04 Equipment Alignment (71111.04)

- 0-SOP-G01-001; Maintenance Operation of EDG G-01; Revision 10
- AR 01228612; OE15886 – Safety-Related Agastat Relays Were Found in Service
- AR 01886057; Replacement of U2 Relays 262-A, 262-B, 2-62/4044 & 2-62/4044
- AR 01989265; U-1 & U-2 AFW Time Delay Relays Replacement Schedule
- AR 02002722; CL 13E Part 1 Unit 1 – Auxiliary Feedwater Valve Lineup Turb
- AR 02019557; Clearance Holder Placed on PWL for 1CC P-11A Clearance
- AR 02033371; Momentary Condenser Hotwell Level Alarm
- AR 02043491; Unit 1 and 2 AF-294A/B are Red Locked and May Not Need to Be
- AR 02044442; CL-13E Versus M-217 Sh 1/2 Capped Valve Configuration
- AR 02044638; NRC Identified Corrosion AF Pipe Supports U2 Truck Bay
- AR 02045019; WO 40277134 Adjusted Day Tank Level Setpoints Too Far
- CL 11A; G-01; G-01 Diesel Generator Checklist; Revision 26
- CL 13E; Part 1; Auxiliary Feedwater Valve Lineup Turbine-Driven Unit 1; Revision 48
- CL 13E; Part 1; Auxiliary Feedwater Valve Lineup Turbine-Driven Unit 2; Revision 27
- CL 13E; Part 2; Auxiliary Feedwater Valve Lineup Motor Driven; Revision 51
- CL 19; Fire Protection System Valves; Revision 46
- CL 7B; Safety Injection System Checklist Unit 1; Revision 34
- Condition Report Search for Auxiliary Feedwater from June 8, 2013 – June 8, 2015
- Condition Report Search for Auxiliary Feedwater from June 9, 2014 – June 9, 2015
- Condition Report Search for Mispositioning from April 21, 2014 – April 21, 2015
- Condition Report Search for Mispositioning from January 1, 2015 – June 29, 2015
- Condition Report Search for Tag from January 1, 2015 – June 29, 2015
- Drawing 110E017; Sheet 1; Safety Injection System; Revision 59
- Drawing 110E017; Sheet 2; Safety Injection System; Revision 65
- Drawing E-2098; Sheet 16A; Wiring Interconnection Diagram Turbine Driven Auxiliary Feedwater Trip/Throttle Valve 2MS-02082; Revision 4

- Drawing M-207; Sheet 1; Service Water; Revision 86
- Drawing M-207; Sheet 4; Service Water System; Revision 30
- Drawing M-208; Sheet 1; Point Beach N.P. Unit 2; Revision 47
- Drawing M-209; Sheet 12; Emergency Diesel Air Starting System; Revision 22
- Drawing M-217; Sheet 1; Auxiliary Feedwater System; Revision 101
- Drawing M-217; Sheet 2; Auxiliary Feedwater System; Revision 31
- Drawing M-217; Sheet 3; Auxiliary Feedwater System; Revision 6
- Drawing M-219; Sheet 3; Fuel Oil System Diesel Generator Building; Revision 15
- Drawing M-2206; Gland Steam Drains; Revision 38
- Drawing M-2207; Sheet 2; Service Water System; Revision 19
- Drawing M-2217; Auxiliary Feedwater System; Revision 5
- Drawing PBM-227; Radwaste Steam Supply; Revision 37
- Engineering Evaluation 2002-0035; Replacement Schedule of the ESF Electronic Time Delay Relays (ETDR); October 3, 2003
- Fire Protection Evaluation Report; Section 3.3; Fire Suppression System Design Basis; Revision 14
- FSAR Section 14.1.10; Loss of Normal Feedwater
- FSAR Section 15.2; Fire Protection Program; 2010
- FSAR Section 5.2; Containment Isolation System
- FSAR Section 7.3; Engineered Safety Features Actuation System
- OI-168; Emergency Diesel Generator Operability
- RMP 9043-17; Emergency Diesel Generator G-01 Pre-Maintenance Run and Testing; Revision 11
- RMP Index 1000; Routine Maintenance Procedures; Revision 802
- System Health Report for Auxiliary Feedwater from April 1, 2015 – June 30, 2015
- TS-81; Emergency Diesel Generator G-01 Monthly; Revision 84
- WM-AA-200; Work Management Process Overview; Revision 11
- WM-AA-203-1002; Graded Approach to Scheduling; Revision 4
- WO 00347173-29; P-31A & B Screen Wash Pumps Capacity Test
- WO 00370422-73; EC 13403 2P-29 Low Suct Press Trip Time Delay Relay Cal
- WO 40244991-01; Group A Mechanical Maintenance Items Inspection
- WO 40278871-02; ICP-13.7B-1 – G-03 -Cal's w/ Secure Annunciator PWR
- WO 40313999-01; G-03, Protective Relay Calibration per RMP 9043-32

#### 1R05 Fire Protection (71111.05)

- Drawing PBC-218; Sheet 2; Fire Protection for Turbine Building, Auxiliary Building and Containment Elev. 8'; Revision 31
- Drawing PBC-219; Sheet 1; Fire Emergency Procedure 4.1 Aux Building and Containment Elev. 8'-0"; Revision 8
- Drawing PBC-219; Sheet 3; Fire Emergency Procedure 4.3 Aux Building and Containment Elev. 8'-0"; Revision 5
- FEP 4.0; Fire Emergency Plan; Revision 5
- FEP 4.1; PAB West and Central-El. (-)19'; (-)5'; 8' CCW, CS/SI, AFW; Revision 12
- FEP 4.3; PAB North-El. 8' Charging Pump Area Unit 2, Cryogenic Equipment Area; Revision 10
- Fire Hazards Analysis Report; Revision 6
- Fire Protection Evaluation Report; Revision 14
- FOP 1.2; Potential Fire Affected Safe Shutdown Components; Revision 23
- NP 1.9.13; Ignition Control Procedure; Revision 21
- NP 1.9.9; Transient Combustible Control; Revision 25



- RMP 262; Emergency Replacement of Power Supply Cables to RHR and CCW Pump Motors; Revision 3
- Transient Combustible Control Form 4456; October 31, 2012
- Transient Combustible Control Form 5078; September 26, 2014

#### 1R11 Licensed Operator Requalification Program (71111.11)

- AR 02046977; 1T-406A White OT Delta Setpoint 1 Channel Failed Low
- Control Room Logs for April 7, 2015
- Control Room Logs for May 22, 2015
- EOP-2 Unit 1; Faulted Steam Generator Isolation; Revision 24
- LOC Cycle 15C Schedule; Revision 2
- OM 1.1; Conduct of Plant Operations, PBNP Specific; Revision 46
- PBF-9205; Pre-Job, High Risk Checklist; Revision 25
- PBN LOC 15C 001S; Simulator Exercise Guide for Crew E Cycle 15C; Revision 0

#### 1R12 Maintenance Effectiveness (71111.12)

- 1ICP 10.011 WH; White Channel Delta T Setpoint Calibration at Power; Revision 1
- AF Documentation of Maintenance Rule Performance Criteria; November 6, 2013
- AF Function Lists; March 12, 2013
- AF Maintenance Rule Unavailability Data Sheet from April 1, 2013 – April 1, 2015
- Apparent Cause Evaluation Report CR 02000661, P-38B SSGP Discharge Pressure Controller Maintenance Preventable Functional Failure Auxiliary Feedwater (AF)
- AR 02007841; PC-04019 Determined to be MPFF Therefor ACE Required
- AR 02034437; D-107 Charger Noise and Vibration
- AR 02042210; No corrective action to address human performance aspects of ACE 02000661
- AR 02046977; 1T-406A White OT Delta Setpoint 1 Channel Failed Low
- AR 02049926; 1TM-402B Failure Identified
- AR 02050295; NRC Resident Questions Regarding D107 Phase Imbalance
- AR 02053072; ACE02031054 Did Not Meet Quality Standards
- AR 02056195; Review Procedure FP-E-CAP-01 for Updates
- CE 02034471; D-107 Charger Noise and Vibration; April 16, 2015
- Control Room Logs for March 23, 2015
- Control Room Logs for May 21, 2015 – May 22, 2015
- Drawing D-55-1630S; Wisconsin Electric Power – Pt. Beach P.O. # 19164 Model # 3S-130-500; Revision 6
- EPRI TR-112175; Capacitor Application and Maintenance Guide; August 1999
- FP-E-CAP-01; Electrolytic Capacitor Aging Management; Revision 3
- Listing of Performance Criteria Assessments for AF since January 1, 2014
- Maintenance Rule Functional Failure Evaluation, PC-4019 for AR 02000661
- NPC-17008; Capacitor Reforming for Battery Charger 3S-130-500; April 10, 1984
- NSC Form 4030; In-Storage Preventative Maintenance Task Matrix; July 10, 2013
- POR 02034471; D-107 Charger Noise and Vibration; April 23, 2015
- QR-19164; Power Conversion Products Qualification Report for Class 1E Battery Chargers; May 19, 1981
- WO 40367823; Capacitor and Printed Circuit Board Replacement
- WO 40385510; 1ICP 10.011 WH; White Channel Delta T Setpoint Calibration
- WO 40390371; 1T-406A White OT Delta Setpoint 1 Channel Failed Low

### 1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13)

- AR 02044014; Guarding of EDG – Additional Areas Identified
- AR 02044055; Safety Monitor Look Ahead Cut and Paste Error
- AR 02048629; Instrument Air Compressors Availability WI HELB Barrier OOS
- AR 02051282; NP8.4.16, HELB Barriers, Doesn't Include All Barriers to EDG
- Condition Report Search for Safety Monitor from January 1, 2015 – June 30, 2015
- Control Room Logs for April 22 and 23, 2015
- Control Room Logs for May 22, 2015
- Execution Week Look-Ahead; May 15, 2015
- Execution Week Look-Ahead; May 18, 2015
- MA-AA-212-1000; Rigging and Material Handling; Revision 8
- Narrative Log Report from May 18 – 21, 2015
- Narrative Log Report from May 27 – 28, 2015
- Non-Tech Spec Equipment OOS; April 28, 2015
- Non-Tech Spec Equipment OOS; May 18, 2015
- Non-Tech Spec Equipment OOS; May 19, 2015
- Non-Tech Spec Equipment OOS; May 24, 2015
- NP 10.3.7; On-Line Safety Assessment; Revision 34
- Point Beach Station Unit 1 Daily Status Report for April 28, 2015
- Point Beach Station Unit 1 Daily Status Report for May 18, 2015
- Point Beach Station Unit 1 Daily Status Report for May 19, 2015
- Point Beach Station Unit 1 Daily Status Report for May 27, 2015
- Point Beach Station Unit 2 Daily Status Report for April 28, 2015
- Point Beach Station Unit 2 Daily Status Report for May 18, 2015
- Point Beach Station Unit 2 Daily Status Report for May 19, 2015
- Point Beach Station Unit 2 Daily Status Report for May 27, 2015
- Safety Monitor Change Notice 0069; May 20, 2015
- Tech Spec Equipment OOS and Fire Impairments List; May 16, 2015
- Tech Spec Equipment OOS and Fire Impairments List; May 19, 2015
- Unit 1 Safety Monitor for April 27, 2015
- Unit 1 Safety Monitor for May 5, 2015
- Unit 1 Safety Monitor for May 17, 2015
- Unit 1 Safety Monitor for May 20, 2015
- Unit 1 Safety Monitor for May 26, 2015
- Unit 1 Safety Monitor for May 27, 2015
- Unit 2 Safety Monitor for April 27, 2015
- Unit 2 Safety Monitor for May 5, 2015
- Unit 2 Safety Monitor for May 20, 2015
- Unit 2 Safety Monitor for May 26, 2015

### 1R15 Operability Determinations and Functional Assessments (71111.15)

- AR 02024305; No Isolation Between Components Classified as SR and QR
- AR 02024530; 2HX-12D CC HX Flange Pitting Depth Below Vendor Minimum Wall
- AR 02042698; 1MS-2027, HP Turbine Right Hand Stop Valve Leakby During TS-3
- Drawing E-11; Sheet 4; EDG G-03 4160V Bus 1-A06 Relay and Metering; Revision 11
- Drawing E-2011; Sheet 4; EDG G-04 4160V Bus 2-A06 Relay and Metering; Revision 11
- NP 8.4.13; Fuse Replacement; Revision 9
- POD 02024305; No Isolation Between Components Classified as SR and QR; February 17, 2015

- POD 02024530; Pitting on 2HX-12D Heads and Flanges
- POR 02034471; D-107 Charger Noise and Vibration; April 23, 2015
- TS 3; Main Turbine Stop and Governor Valve With Turbine Trip Test (Biannual) Unit 1; Revision 48
- WO 40165858; Replace G-03 Freq Meter; February 9, 2014

#### 1R18 Plant Modifications (71111.18)

- AR 02050987; OP 2A Unit 1 Normal Power Op U1—NRC Identified—FIN
- NEI Position Statement; Guidance to Licensees on Complying with the Licensed Power Limit (ML081750537); June 12, 2008
- NRC Safety Evaluation Regarding Endorsement of NEI Guidance for Adhering to the Licensed
- OP 2A Unit 1; Normal Power Operation Unit 1; Revision 7
- OP 2A Unit 1; Normal Power Operation Unit 1; Revision 8
- OP 2A Unit 2; Normal Power Operation Unit 2; Revision 7
- OP 2A Unit 2; Normal Power Operation Unit 2; Revision 8
- PBF-2015 Operations Notebook; OP-2A Normal Power Operation; May 4, 2015
- PCR 02050987; OP 2A Unit 1 Normal Power Op U1—NRC Identified—FIN
- PCR 02050988; OP 2A Unit 2 Normal Power Op U2—NRC Identified—FIN
- RIS 2007-21; Adherence to Licensed Power Limits (ML090220365); Revision 1
- Thermal Power Limit (ML082690105); October 8, 2008

#### 1R19 Post-Maintenance Testing (71111.19)

- 0-SOP-IA-001; Operation of Instrument Air Compressors; Revision 8
- 1-SOP-AF-001; Auxiliary Feedwater System Operation – Motor Driven; Revision 1
- AR 01977274; Failed to Receive Expected Alarm & Indication During TS-87
- AR 01982279; W-21A Belt Guard Rubbing on Shaft Causing Sparking
- AR 02002259; W-30B Found Tripped
- AR 02017326; Emergency Lighting – Potential Power Supply Voltage Issue
- AR 02021458; PMT Unsat for P-213B EDG Sump Pump, IT Failed to Start
- AR 02026428; South Cover Leak
- AR 02028667; W-30A-M PAB Exhaust Filter Fan Motor EMAX Trend
- AR 02046458; High Vibrations on W-21A
- AR 02051560; Potential to Miss Post Maintenance Testing Under EWP
- AR 02054004; W-030A-M Motor Shorted to Ground
- AR 02054009; FS-3207, PAB Filter Flow Switch Needs Repair
- AR 02054460; DPI-4713C The PAB to TH Pressure Gauge is Starting to Fail
- AR 02054744; W-030A-M Base Plate Bolting Issue
- AR 02054797; Two Pieces of Drive Belt Found in W-21B Exh Fan Belt Guard
- Certificate of Calibration for OPSSW-019; November 24, 2014
- Clearance Coversheet for Clearance: 0 IA IA-6329A-S EM 03
- Condition Report Search for PMT from January 1, 2015 – June 26, 2015
- Condition Report Search for Post Maintenance Testing from January 1, 2015 – June 26, 2015
- Documentation of Maintenance Rule Performance Criteria for MS (Main Steam); September 5, 2012
- Drawing 499B466; Sheet 232; 4160V SWGR 1A06 Cubicle 83 Auxiliary FW Pump 1P-053; Revision 1
- Drawing M-209; Sheet 3; Instrument Air; Revision 18
- FSAR; Section 10.1; Steam and Power Conversion System; 2014
- FSAR; Section 10.2; Auxiliary Feedwater System (AF); 2014

- FSAR; Section 14.2.4; Steam Generator Tube Rupture; 2010
- FSAR; Section 14.2.7; Inadvertent Opening of a Steam Generator (SG) Relief or Safety Valve; 2012
- FSAR; Section 7.3; Engineered Safety Features Actuation System; 2012
- FSAR; Section 9.5; Primary Auxiliary Building Ventilation System; 2013
- FSAR; Section 9.7; Instrument Air (IA) / Service Air (SA); 2013
- IT 90 Train B; Atmospheric Steam Dump Valve Train B Unit 1; Revision 3
- MA-AA-203-1000; Maintenance Functional Testing; Revision 3
- RMP 9141; Air-Operated Valve Testing and Adjustment; Revision 12
- RMP 9380-6; EQ Tape Splice Procedure; Revision 1
- SCR 2013-0062; Revision to IT 90 Train B Following Rebaselining of 1MS-2015 ADV; April 29, 2013
- TS 87; Primary Auxiliary Building Ventilation System Monthly Checks; Revision 5
- WO 40098772-03; DA-00300/Prefab Welding
- WO 40122775-01; A52-HK-1200-02; 12 Yr Refurbishment-Receipt
- WO 40165833-02; 1A52-81-CS: Perform Bench Check of Replacement Switch
- WO 40275891-02; G-03 – Ops – Verify Exhaust Manifold Thermocouples Function
- WO 40277134-01; LIT-03992A / T-176A Level Switches Actuate Low
- WO 40277134-04; LIT-03992A / Operations PMT (SOP Run)
- WO 40289592-02; HX-266A Ops PMT/RTS
- WO 40309390-02; PS-3350A – Pressure Switch Replacement – Ops PMT/RTS
- WO 40310458-02; W-183A / Ops PMT/RTS (1B-40 Energized)
- WO 40313996-02; W-183C Operations PMT/RTS
- WO 40313997-02; W-183B Operations PMT/RTS
- WO 40320500-05; 1A52-83, Perform Breaker Swap with Prepared Spare
- WO 40320500-06; 1A52-83; Ops PMT / RTS Following Breaker Swap (1P-53)
- WO 40320512-02; Ops PMT/RTS (TS-83)
- WO 40320635-01; IA-06329A-S, Replace Solenoid Valve
- WO 40320635-02; IA-06329A-S, Operations PMT/RTS
- WO 40325365-02; 1P-053 / Change Oil in Pump
- WO 40325365-03; Ops PMT/RTS
- WO 40327656-01; 1P-011B Grease Coupling
- WO 40327657-01; 1P-011B Change Oil, Flush Bearings and Clean Intake Grills
- WO 40328777-01; W-185A Install Scaffold as Required
- WO 40328777-04; W-185A Remove Scaffold After PMT
- WO 40337911-03; W-185A / Install Scaffold/Rigging Scaffold
- WO 40337911-04; W-185A / Remove Scaffolding
- WO 40339106-01; 1P-011B/Install Support Bracket on IB/OB Oiler/Sight Glass
- WO 40352499-01; 1MS-02015 Atmospheric Dump Valve has Minor Packing Leak
- WO 40352499-02; 1MS-2015 – Ops PMT
- WO 40367786-02; T-177A / Install Scaffold as Required
- WO 40367786-03; T-177A / Remove Scaffold as Required
- WO 40367786-04; T-177A / Ops PMT/RTS
- WO 40395369; F-23/F-29 PAB Exhaust Filter Fan Motor

#### 1R22 Surveillance Testing (71111.22)

- AR 02021074; 1A00-82, Check Integrity of Test Jacks at UV Test Panel
- AR 02024261; Test Rigs Calibration Out of Date – May Affect Tech Spec Surv
- AR 02031020; 1TM-403V Delta T SP2 Summer Found Out of Spec
- AR 02043715; Clarification of Acceptable Stop Valve Closure in Procedure

- AR 02049543; Inconsistency of RCS Leakrate Determination with WCAP-16423
- AR 02049561; Lack of Rigorous Basis for RCS Leakrate Calculations
- AR 02052824; Latent Error Carried Forward Into I&C Procedure
- Calculation 2002-0003; Service Water System Design Basis; Revision 4
- Calculation 2010-0034; Volume Control Tank Volume to Percent; Revision 0
- Control Room Logs for May 11, 2015
- Drawing 110E029; Sheet 1; Unit 2 Auxiliary Coolant; Revision 56
- Drawing M-207; Sheet 1; Service Water; Revision 86
- Drawing M-207; Sheet 1A; Service Water; Revision 41
- Drawing M-207; Sheet 4; Service Water System; Revision 30
- Drawing M-217; Sheet 1; Auxiliary Feedwater System; Revision 101
- Drawing M-217; Sheet 2; Auxiliary Feedwater System; Revision 31
- Drawing M-217; Sheet 3; Auxiliary Feedwater System; Revision 6
- IT 04 Train B; Low Head Safety Injection Pumps and Valves Train B Unit 2; Revision 3
- IT 07G; Service Water Valves (Quarterly); Revision 10
- OI 55; Primary Leak Rate Calculation; Revision 28
- OM 3.26; Use of Dedicated/Assigned Operators; Revision 16
- PBF-2131 Control Room Miscellaneous Shift Log – Modes 1-3; May 18, 2015
- PBF-2132; Control Room Miscellaneous Shift Log – Modes 1-3; February 13, 2014
- PBNP Inservice Testing Background Valve Data Sheet for Valve 0SW-02869
- PC 43 Part 5; Service Water to Auxiliary Feedwater Pump Line Flush Monthly; Revision 21
- PMRQ 60387-03; IT 04 Train B Work Order History as of April 7, 2015
- SCR 2014-0051; Revision to IT 07G Following SW-2891 Replacement
- Tank Level Book TLB 2; Pressurizer Percent to Cubic Feet Conversion
- Tank Level Book TLB 4; Volume Control Tank Percent to Gallons Conversion
- Technical Specification 3.7.8; Service Water (SW) System
- TS 33; Containment Accident Recirculation Fan-Cooler Units (Monthly) Unit 1; Revision 34
- Unit 1 Leakrate Graph Data; April 11, 2014 – April 30, 2014 and April 27, 2015 – May 16, 2015
- Unit 2 Leakrate Graph Data; April 29, 2015 – May 17, 2015
- Unnumbered and Unreviewed Calculation for Pressurizer T-1 Tank Level Book Verification; July 3, 1990
- WCAP-16423-NP; Pressurized Water Reactors Owners Group Standard Process and Methods for Calculating RCS Leak Rate for Pressurized Water Reactors; September 2006
- WO 40320257; IT 04 Train B
- WO 40326274; Service Water to Auxiliary Feedwater Pump Line Flush

#### 2RS7 Radiological Environmental Monitoring Program (71124.07)

- 2014 Annual Monitoring Report; April 29, 2015
- Approval under 10 CFR 20.302(a) of Procedures for Disposal of Contaminated Sewage Sludge; January 13, 1988
- AR 01889950; Revise REMP Lake/Drinking Water I-131 and H-3 LLDs
- AR 01893935; Environmental Air Samplers Correction Factor Incorrect
- AR 01984500; SGSF North Sump Contamination – 50.75G
- Environmental Manual; Revision 25
- HPIP 3.58.1; Radiological Environmental Sampling; Revision 2
- NextEra Energy Point Beach, LLC 2014 Land Use Survey; October 8, 2014
- PBF-4020; Low Volume Air Sampler Maintenance and Calibration Record; Various Dates
- Response to Request for Additional Information for 10 CFR 20.302 Application; October 8, 1987

- Title 10 CFR 20.302 Requests for Approval of Procedures for Disposal of Sewage Treatment Sludge; July 14, 1987
- WO 40334130 01; ICP 6.55 – Calibrate Meteorological Field Instrumentation

#### 4OA1 Performance Indicator Verification (71151)

- NEI 99-02; Regulatory Assessment Performance Indicator Guideline
- NP 5.2.16; NRC Performance Indicators
- PB Unit 1; Reactor Coolant System Leakage; 3Q2014, 1Q2015, 2Q2015
- Performance Indicators; Reactor Coolant System Leakage, Units 1 and 2; 3Q2014 through 2Q2015
- PI Data; July 2014 through May 2015

#### 4OA2 Identification and Resolution of Problems (71152)

- AR 02012484; EX14 ? Management of Simulated Failed Fuel Event
- AR 02012485; EX14 – Changing Meteorological Conditions – Ineffective Comm
- AR 02012495; EX14 ? Email Distribution of News Releases Did Not Occur
- AR 02012496; EX14 – Communications Following Release Less Than Adequate
- AR 02016313; Trend on Unit 2 IRPI
- AR 02016813; Recurring Problem with Uncontrolled Transient Combustibles
- AR 02019058; Fire Protection Program Performance
- AR 02023821; Adverse Found in Performance of CE
- AR 02024656; EX14 Adverse Trend Identified During DEC. NRC Exercise
- AR 02026792; Potential Trend – EOP Procedure Challenges
- AR 02028305; Simulator PPCS Failed During NRC-Evaluated Scenario
- AR 02029686; Requested Actions Not Completed From Graded Exercise CR
- AR 02032046; Worker Failed to Sign on to Clearance Order
- AR 02034437; D-107 Charger Noise and Vibration
- AR 02042729; 1C-005 – RA2/RTD Did Not Pickup Allowing Auto Reheat Steam
- AR 02042806; 1OS-3-CV, 1OS-3-DV Steam Dump Pilot Oper Control, Seat Leaka
- AR 02044725; Nuclear Safety Culture Leading Indicator 1Q15
- AR 02045912; Nuclear Safety Culture Leading Indicator 1Q15
- AR 02047371; Non-Conservative TRM 2.2 (PTLR) for LTOP
- AR 02048157; Update References for TRM 2.2 (PTLR)
- AR 02050295; NRC Resident Questions Regarding D107 Phase Imbalance
- AR 02050987; OP 2A Unit 1 Normal Power Op U1—NRC Identified—FIN
- AR 02053072; ACE02031054 Did Not Meet Quality Standards
- AR 02056195; Review Procedure FP-E-CAP-01 for Updates
- ASME Section XI Code; 2001 Edition; 2003 Addenda; Subsection IWL Requirements for Class CC Concrete Components of Light-Water Cooled Plants
- Calculation 2000-0001; RCS Pressure-Temperature Limits and LTOP Setpoints Applicable Through 32.2 EFPY – Unit 1 and 34.0 EFPY – Unit 2; March 6, 2000
- Calculation 2005-0057; LTOP Loop P-420 (RC Loop A Hot Leg Pressure) and LTOP LOP
- Calculation CN-SCS-06-68; LTDPs Setpoint Analysis for Point Beach Units 1 and 2; Revision 1
- Calculation SE/FSE-C-WEP-0159; Point Beach Units 1 and 2 LTOP Analysis; Revision 0
- CE 02034471; D-107 Charger Noise and Vibration; April 16, 2015
- Control Room Logs for March 23, 2015
- Drawing D-55-1630S; Wisconsin Electric Power – Pt. Beach P.O. # 19164 Model # 3S-130-500; Revision 6

- Filling of Owners Inservice Summary Report for Point Beach Nuclear Plant Tendon Surveillance and Concrete Containment Examinations; February 27, 2015
- FP-E-CAP-01; Electrolytic Capacitor Aging Management; Revision 3
- ISI IWL Program 2<sup>nd</sup> Internal Containment Inspection Program; Revision 2
- LIC 02048157; 10 CFR Applicability Determination for Pressure & Temperature Limits Report (PTLR, TRM 2.2); May 19, 2015
- NEI Position Statement; Guidance to Licensees on Complying with the Licensed Power Limit (ML081750537); June 12, 2008
- NMC Letter NPL 2007-0016; Response to WEP-06-061; January 23, 2007
- NPC-17008; Capacitor Reforming for Battery Charger 3S-130-500; April 10, 1984
- NRC Safety Evaluation Regarding Endorsement of NEI Guidance for Adhering to the Licensed Thermal Power Limit (ML082690105); October 8, 2008
- NSC Form 4030; In-Storage Preventative Maintenance Task Matrix; July 10, 2013
- NUREG/CR-6598; An Investigation of Tendon Sheathing Filler Migration Into Concrete
- OP 2A Unit 1; Normal Power Operation Unit 1; Revision 7
- OP 2A Unit 1; Normal Power Operation Unit 1; Revision 8
- OP 2A Unit 2; Normal Power Operation Unit 2; Revision 7
- OP 2A Unit 2; Normal Power Operation Unit 2; Revision 8
- Owners Inservice Summary Report for Point Beach Nuclear Plant Refueling Outage U2R26 and 33<sup>rd</sup> Year Tendon Surveillance and Concrete Examination; February 19, 2004
- P-493 (T-1 Pressurizer Pressure) Instrument Scaling and Uncertainty Calculation; Revision 0
- PBF-2015 Operations Notebook; OP-2A Normal Power Operation; May 4, 2015
- PCR 02050987; OP 2A Unit 1 Normal Power Op U1—NRC Identified—FIN
- PCR 02050988; OP 2A Unit 2 Normal Power Op U2—NRC Identified—FIN
- POR 02034471; D-107 Charger Noise and Vibration; April 23, 2015
- QR-19164; Power Conversion Products Qualification Report for Class 1E Battery Chargers; May 19, 1981
- RIS 2007-21; Adherence to Licensed Power Limits (ML090220365); Revision 1
- Safety Evaluation for Proposed Alternative to ASME Code; Section XI; Containment Inspection Program for the Point Beach Nuclear Plant, Units 1 and 2
- TRM 2.2; Pressure Temperature Limits Report – Mark Up with Proposed Changes; May 18, 2015
- WO 40367823; Capacitor and Printed Circuit Board Replacement

## LIST OF ACRONYMS USED

AC	Alternating Current
ADAMS	Agencywide Document Access Management System
AFW	Auxiliary Feedwater
AR	Action Request
CAP	Corrective Action Program
CCW	Component Cooling Water
CFR	Code of Federal Regulations
CST	Condensate Storage Tank
DC	Direct Current
EDG	Emergency Diesel Generator
FSAR	Final Safety Analysis Report
FW	Feedwater
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
ISPM	In-Service Preventative Maintenance Program
LCO	Limiting Condition for Operation
NCV	Non-Cited Violation
NP	Nuclear Procedure
NRC	Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
OOS	Out-of-Service
PARS	Publicly Available Records
PI	Performance Indicator
PMT	Post-Maintenance Testing
POD	Prompt Operability Determination
POR	Past Operability Review
RCS	Reactor Coolant System
SDP	Significance Determination Process
SI	Safety Injection
SSC	Structures, Systems, and Components
TS	Technical Specification
TSO	Transmission System Operator
URI	Unresolved Item
WO	Work Order



E. McCartney

-2-

In accordance with Title 10 of the Code of Federal Regulations (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

**/RA/**

Jamnes Cameron, Chief  
Branch 4  
Division of Reactor Projects

Docket Nos. 50-266; 50-301  
License Nos. DPR-24; DPR-27

Enclosure:  
IR 05000266/2015002; 05000301/2015002  
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