

# Oconee 3

## 2Q/2007 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:**  Jun 30, 2007

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Failure to Ensure Tagout Compatibility with Plant Conditions**

A self-revealing non-cited violation (NCV) of Technical Specification (TS) 5.4.1 was identified for failure to ensure a high pressure service water (HPSW) system tagout was compatible with overall plant conditions, in that the elevated water storage tank (EWST) was inadvertently isolated from the turbine building and auxiliary building. Consequently, the backup cooling water supply to the high pressure injection pump motors was unknowingly isolated. The inspectors determined that the finding was more than minor because it affected the reliability objective of the Equipment Performance attribute under the Mitigating Systems Cornerstone. The finding was potentially risk significant due to external initiating events (i.e., turbine building flood), because it involved degradation of a function specifically designed to mitigate a flooding event, and the loss of this system during a flooding event would degrade both trains of high pressure injection. The licensee performed a plant specific risk assessment to identify core damage sequences of concern. The staff reviewed this risk assessment and concluded that due to the low initiating event frequency and short exposure time, the finding was appropriately characterized as having very low safety significance. The inspectors determined that the cause of the finding was related to the work control aspect of the cross-cutting area of human performance [H.3(b)]. (Section 1R12)

Inspection Report# : [2007003](#) (*pdf*)

**Significance:**  Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Meet the Minimum Licensed Operator Staffing Requirements as required by 10 CFR 50.54(m)(2)(i)**

The inspectors identified an non-cited violation (NCV) of 10 CFR 50.54 Conditions of a license, for failing to meet the minimum licensed operator staffing requirements as stated in 10 CFR 50.54(m)(2)(i). Between March 2003 and February 2007, seven Senior Reactor Operators (SROs) who had not satisfied all the requalification requirements stood licensed required positions which resulted in the staffing requirements of 10 CFR 50.54(m)(2)(i) not being met. This issue was entered into the licensee's corrective actions program and the extent of condition was properly assessed. This finding is more than minor because it is associated with the configuration control and equipment performance attributes of the Mitigating Systems Cornerstone and adversely affects the cornerstone objective to ensure the availability and reliability of systems that respond to initiating events. Because this finding was not suitable for SDP evaluation, it was reviewed by NRC management and determined to be of very low safety significance (Green). The finding is of very low safety significance because these SROs had not made errors related to qualifications while performing their licensed duties and had successfully completed other aspects of the requalification program, such as the biennial written examination and routine testing conducted throughout the requalification training period. (Section 1R11.2)

Inspection Report# : [2007003](#) (*pdf*)

**Significance:**  Nov 17, 2006

Identified By: Licensee

Item Type: VIO Violation

### **Inadequate Foreign Material Exclusion Controls for the Unit 3, A and B Train Reactor Building Emergency Sump Suction Lines**

Violation of Technical Specification 5.4.1, Procedures, and Section 9.e of referenced Regulatory Guide 1.33 for the failure to comply with Nuclear System Directive (NSD) 104, Material Condition/Housekeeping, Cleanliness/Foreign Material Exclusion and Seismic Concerns, by not maintaining the Unit 3 RBES free of foreign material. Specifically, some time prior to and for the duration of Oconee Unit 3 operating cycle 22 [December 24, 2004 (Mode 4 towards startup) through April 29, 2006 (Mode 5 for the EOC RFO)], adequate foreign material exclusion controls had not been implemented, in that on April 30 and May 1, 2006, foreign material was discovered in the A and B RBES suction lines to the LPI and BS pumps.

Inspection Report# : [2007006](#) (*pdf*)

**Significance:** **W** Aug 31, 2006

Identified By: NRC

Item Type: VIO Violation

### **Inadequate Procedural Controls and Risk Management Associated with Breach in SSF Flood Protection Barrier**

Contrary to Technical Specification 5.4.1 and 10 CFR 50.65(a)(4), the licensee failed to use adequate procedures to control maintenance activities (removal of a CO2 access cover from SSF flood barrier to facilitate installation of temporary electrical power cables) that could affect safety-related equipment and therefore failed to assess and manage the increase in risk from external floods for this maintenance activity [H.3(a)].

Inspection Report# : [2006017](#) (*pdf*)

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## **Barrier Integrity**

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## **Emergency Preparedness**

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## **Occupational Radiation Safety**

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## **Public Radiation Safety**

**Significance:** **G** Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to conduct adequate QA activities to ensure waste shipments are characterized in accordance with 10 CFR 61.55**

The inspectors identified a NCV of 10 CFR 20 Appendix G, Section III.A.3 for failure to conduct adequate Quality Assurance activities to ensure compliance with the waste characterization requirements of 10 CFR 61.55. Specifically, the licensee failed to properly evaluate the significance of changes between calendar year (CY) 2004 and CY 2005 for 10 CFR Part 61.55 carbon-14 (C-14) analysis results associated with primary coolant filter waste stream samples. The identified changes in the C-14 isotopic abundance and derived scaling factors for primary filters in CY 2005 could have resulted in the improper classification of radioactive waste shipped to a licensed burial site for final disposal. The licensee has entered this finding into their corrective action program for resolution under Problem Investigation Process report (PIP) O-07-02811. This example is more than minor because it adversely affects the program and process attribute of the Public Radiation Safety cornerstone, in that it involves an occurrence in the licensee's radioactive material transportation program that is contrary to NRC regulations. The finding was determined to be of

low safety significance because the waste classification of primary filter shipments sent for disposal using the CY 2005 data was not changed by the differences in C-14 isotopic abundance that were identified. The cause of this finding is related to the self/independent assessment aspect of the cross-cutting area of Problem Identification and Resolution [P.3(a)]. (Section 2PS2)

Inspection Report# : [2007003](#) (*pdf*)

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## Physical Protection

Although the NRC is actively overseeing the Security cornerstone, the Commission has decided that certain findings pertaining to security cornerstone will not be publicly available to ensure that potentially useful information is not provided to a possible adversary. Therefore, the [cover letters](#) to security inspection reports may be viewed.

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## Miscellaneous

Last modified : August 24, 2007