

# Clinton

## 1Q/2011 Plant Inspection Findings

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### Initiating Events

**Significance:**  Mar 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO CONTROL TRANSIENT COMBUSTIBLE MATERIALS IN ACCORDANCE WITH FIRE PROTECTION PROGRAM.**

The inspectors identified a finding of very low safety significance with an associated non-cited violation of the Clinton Power Station Unit 1 Operating License (NPF 62, Section 2.F). The licensee failed to implement the Fire Protection Program in accordance with program requirements by failing to follow approved Fire Protection Program procedures for the control of transient combustible materials. The licensee promptly removed the transient combustible materials found by the inspectors and initiated compensatory measures.

The inspectors concluded that this finding could be reasonably viewed as a precursor to a significant event (i.e., a fire affecting more than one train of safe shutdown equipment). Specifically, the presence of transient combustible materials in a combustible free zone could reasonably result in degradation of the fire protection defense in depth elements in place to prevent fires from starting and mitigate the consequences of fires. In addition, based on review of Example 4k in IMC 0612, "Power Reactor Inspection Reports," Appendix E, "Examples of Minor Issues," the issue would not be considered to be of minor significance because the identified transient combustibles were found in a combustible free zone required for separation of redundant trains. The finding was of very low safety significance because the items found in the combustible free zone would not be considered transient combustibles of significance as defined in IMC 0609, Appendix F, "Fire Protection Significance Determination Process," Attachment 2, "Degradation Rating Guidance Specific to Various Fire Protection Program Elements," and, therefore, the issue was assigned a "low degradation" rating. The inspectors concluded that this finding affected the cross cutting area of human performance. Although a pre-job briefing was not required by the licensee's procedure for the work activity, job site conditions and a discussion that the work was within a Transient Combustible Free Zone (TCFZ) was not included in the briefing. In addition, the workers' 2 Minute Drill performed at the job site did not identify that work activities were within a TCFZ. Therefore, the inspectors concluded that the licensee's work practices which support human performance were less than effective (H.4(a)).

Inspection Report# : [2011002](#) (*pdf*)

**Significance:**  Mar 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO MEET SURVEILLANCE TESTING REQUIREMENT FOR HYDROGEN IGNITERS IN ACCESSIBLE AREAS OF THE PRIMARY CONTAINMENT AND DRYWELL.**

The inspectors identified a finding of very low safety significance with an associated non-cited violation of Technical Specification Surveillance Requirement (TSSR) 3.6.3.2.4. The licensee failed to verify that each required hydrogen igniter in accessible areas of the Primary Containment and Drywell develops a surface temperature of = 1700 degrees Fahrenheit (°F) every 24 months. The licensee performed a risk assessment of the missed surveillance in accordance with TSSR 3.0.3, which determined that completion of the surveillance could be delayed up to the 24 month surveillance interval without a significant increase in plant risk. The licensee also completed an operability evaluation for the TS nonconformance and concluded that there was reasonable assurance that the affected hydrogen igniters were operable based on the results of surveillance testing to measure voltage/current draw.

The finding was of more than minor significance because it was associated with the Human Performance attribute for the Containment and adversely affected the Barrier Integrity Cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Specifically, the licensee did not correctly evaluate a change to perform the surveillance test with the unit at power beginning in March 2002. It was not recognized that TSSR 3.6.3.2.4 would not be met for accessible hydrogen igniters in the

Drywell and 755' Elevation Steam Tunnel when performing the test with the unit at power and the licensee incorrectly believed that performance of the current/voltage surveillance test procedure for inaccessible igniters was an appropriate substitute, contrary to existing procedural guidance. The finding was a licensee performance deficiency of very low safety significance because it did not involve an actual reduction in the function of hydrogen igniters in the Primary Containment and Drywell. The inspectors concluded that because the scheduling change to perform the surveillance with the unit at power took place prior to surveillance testing beginning in March 2002, it did not necessarily reflect current licensee performance and no cross-cutting aspect was identified.

Inspection Report# : [2011002](#) (pdf)

**Significance:**  Mar 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

**INADEQUATE TESTING CONTROLS TO PERFORM SURVEILLANCE TESTING OF HYDROGEN IGNITERS IN THE PRIMARY CONTAINMENT AND DRYWELL.**

The inspectors identified a finding of very low safety significance with an associated non-cited violation of 10 CFR 50, Appendix B, Criterion XI, "Test Control." The licensee failed to establish a test program adequate to assure testing of hydrogen igniters in accessible areas of the Primary Containment and Drywell pursuant to TSSR 3.6.3.2.4. The licensee entered this violation into its corrective action program to investigate the cause and to identify appropriate corrective actions.

The finding was of more than minor significance because it was associated with the Procedure Quality attribute for the Containment and adversely affected the Barrier Integrity Cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The finding was a licensee performance deficiency of very low safety significance because it did not involve an actual reduction in the function of hydrogen igniters in the Primary Containment and Drywell. The inspectors concluded that this finding affected the cross-cutting aspect of human performance. Specifically, adequate licensee resources involving personnel and procedures did not support successful human performance. CPS 9867.05 was not appropriate to the circumstances because it contained errors and did not provide adequate testing controls for the performance of the surveillance test (H.2(c)).

Inspection Report# : [2011002](#) (pdf)

**Significance:**  Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**FAILURE TO CONTROL TRANSIENT COMBUSTIBLE MATERIALS IN ACCORDANCE WITH FIRE PROTECTION PROGRAM.**

The inspectors identified a finding of very low safety significance with an associated Non-Cited Violation of the Clinton Power Station Unit 1 Operating License (NPF-62, Section 2.F). The licensee failed to implement the Fire Protection Program in accordance with program requirements by failing to follow approved Fire Protection Program procedures for the control of transient combustible materials. The licensee promptly removed the transient combustible materials found by the inspectors.

The inspectors concluded that this finding could be reasonably viewed as a precursor to a significant event (i.e., a fire affecting more than one train of safe shutdown equipment). Specifically, the presence of transient combustible materials in a combustible free zone could reasonably result in degradation of the fire protection defense-in-depth elements in place to prevent fires from starting and mitigate the consequences of fires. In addition, based on review of Example 4k in IMC 0612, "Power Reactor Inspection Reports," Appendix E, "Examples of Minor Issues," the issue would not be considered to be of minor significance because the identified transient combustibles were found in a combustible free zone required for separation of redundant trains. The finding was of very low safety significance because the items found in the combustible free zone would not be considered transient combustibles of significance as defined in IMC 0609, Appendix F, "Fire Protection Significance Determination Process," Attachment 2, "Degradation Rating Guidance Specific to Various Fire Protection Program Elements," and, therefore, the issue was assigned a "low degradation" rating. The inspectors concluded that this finding affected the cross-cutting area of human performance. Specifically, the licensee failed to recognize that moving a bullet-resistant container (BRC) was

an infrequent activity and, as such, a pre-job briefing should have been performed and was not. In addition, a questioning attitude was not cultivated by the licensee once the correct location of the BRC wash challenged such that security staff proceeded in the face of uncertainty. Therefore, the inspectors concluded that the licensee's work practices that support human performance were less than effective. (IMC 0305 H.4(a))

Inspection Report# : [2010005](#) (*pdf*)

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## Mitigating Systems

**Significance:**  Mar 18, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Ensure Fire Door was Closed and Latched.**

A finding of very low safety significance and associated NCV of Clinton Power Station Unit 1 Operating License NPF-62, Section 2.F was identified by the inspectors for the licensee's failure to ensure fire doors were closed and latched. Specifically, during a walkdown of fire area CB-1e "737" General Access Area," fire door 1DR1-432 located between fire area CB-1e and D-6 "Emergency Diesel 2 Room," was found unlatched/not fully closed. The door was a 3-hour fire rated door credited for fire barrier between the two fire areas. Site personnel closed the door when it was found open and the door remained fully closed when challenged. The issue was entered into the licensee corrective action program as AR 01187906.

The inspectors determined that this finding was more than minor because the finding affected the Mitigating Systems cornerstone attributes of protection against external factors (Fire) and affected the cornerstone objective of ensuring the capability of the system to respond to events to prevent undesirable consequences. This finding was of very low safety significance (Green) based on answering "Yes" to Question 7 of Task 1.3.2. of Appendix F of IMC 0609. The inspectors did not identify a cross-cutting aspect associated with this finding because the underlining cause of unlatched door was indeterminate during the inspection.

Inspection Report# : [2011009](#) (*pdf*)

**Significance:** SL-IV Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **FAILURE TO SATISFY 10 CFR 50.72 AND 50.73 REPORTING REQUIREMENTS.**

The inspectors identified a Severity Level IV Non- Cited Violation of the NRC's reporting requirements in 10 CFR 50.72(a)(1), "Immediate Notification Requirements for Operating Nuclear Power Reactors," and 10 CFR 50.73(a)(1), "Licensee Event Report System." The licensee failed make a required 8-hour non-emergency notification call to the NRC Operations Center and failed to submit a required Licensee Event Report within 60 days after discovery of a condition that resulted in the plant being in an unanalyzed condition that significantly degraded plant safety and could have prevented fulfillment of the safety function of the emergency core cooling system. No immediate corrective actions were taken to address this finding; however, the licensee entered this issue into its corrective action program for evaluation.

This violation was of more than minor significance because the NRC relies on licensees to identify and report conditions or events meeting the criteria specified in the Technical Specifications and the regulations in order to perform its regulatory function. Because this issue affected the NRC's ability to perform its regulatory function, the inspectors evaluated it using the traditional enforcement process. The underlying technical issue (i.e., interconnecting floor drains between the Residual Heat Removal 'A' Pump Room and the Radwaste Pipe Tunnel) was determined to be a finding of very low safety significance during a Phase 3 SDP evaluation. Consistent with the guidance in Supplement I, Paragraph D.4, of the NRC Enforcement Policy, the violation associated with this finding was determined to be a Severity Level IV Violation.

The related performance deficiency is tracked as item 2010-003-06.

Inspection Report# : [2011010](#) (*pdf*)

Inspection Report# : [2010003](#) (*pdf*)

**Significance:** G Jun 30, 2010

Identified By: NRC

Item Type: FIN Finding

**OPERABILITY ASSESSMENT OF INSERVICE TESTING SURVEILLANCE DISCREPANCIES FOR EXCESS FLOW CHECK VALVES**

The inspectors identified a finding of very low safety significance associated with the licensee's failure to evaluate the functionality of multiple excess flow check valves that had not been tested in accordance with the American Society of Mechanical Engineers / American National Standards Institute (ASME/ANSI) Code Inservice Testing requirements to establish whether the nonconforming condition warranted starting the Technical Specification (TS) action time for the suppression pool makeup (SPMU) system. In response to the inspectors' questions, the licensee subsequently performed an operability evaluation. No violation of regulatory requirements was identified because subsequent testing by the licensee determined that the valves were functional.

The finding would become a more significant safety concern if left uncorrected and was therefore more than a minor concern. Specifically, the failure to correctly evaluate a degraded/nonconforming condition potentially affecting the operability of structures, systems, or components (SSCs) required to be operable by TS could reasonably result in an unrecognized condition of an SSC failing to fulfill a safety-related function. Because the SPMU system was primarily associated with long term decay heat removal following certain design basis accidents, the inspectors concluded that this issue was associated with the Mitigating Systems Cornerstone. The finding was of very low safety significance because the issue: (1) was not a design or qualification deficiency; (2) did not represent an actual loss of safety function of a system; (3) did not represent an actual loss of safety function of a single train for greater than its TS allowed outage time; (4) did not represent an actual loss of safety function of one or more non-TS trains of equipment designated as risk significant; and (5) did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. The inspectors concluded that this finding affected the cross-cutting area of human performance because the licensee did not have a formal process in place with adequate guidance and training to enable licensed senior reactor operators to properly and promptly evaluate operability in this instance. As a result, senior reactor operators took it for granted that utilizing the relief allowed by TS Surveillance Requirement 3.0.3 and performing a risk evaluation obviated the need to address the operability of the instrumentation supported by the excess flow check valves for the ASME/ANSI Code noncompliance.

Inspection Report# : [2010003](#) (*pdf*)

**Significance:** G Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Satisfy 10 CFR 50.72 and 50.73 Reporting Requirements - performance deficiency portion.**

The inspectors identified a finding of very low safety significance of the NRC's reporting requirements in 10 CFR 50.72(a)(1), "Immediate Notification Requirements for Operating Nuclear Power Reactors," and 10 CFR 50.73(a)(1), "Licensee Event Report System." The licensee failed to make a required 8-hour non-emergency notification call to the NRC Operations Center and failed to submit a required Licensee Event Report within 60 days after discovery on October 7, 2009, of a condition that resulted in the plant being in an unanalyzed condition that significantly degraded plant safety and could have prevented fulfillment of the safety function of the emergency core cooling system. No immediate corrective actions were taken to address this finding; however, the licensee entered this issue into its corrective action program for evaluation.

This finding was of more than minor significance because the NRC relies on licensees to identify and report conditions or events meeting the criteria specified in the Technical Specifications and the regulations in order to perform its regulatory function. The inspectors assessed the significance of the underlying performance deficiency using the SDP. The underlying technical issue (i.e., interconnecting floor drains between the Residual Heat Removal 'A' Pump Room and the Radwaste Pipe Tunnel) was determined to be a finding of very low safety significance (green) during a Phase 3 Significance Determination Process evaluation. This finding affected the cross cutting area of human performance because the licensee did not use conservative assumptions in decision making while evaluating the reportability of the unanalyzed condition with respect to the reporting requirements in 10 CFR 50.72(a)(1)(ii) and 50.73(a)(1).

The related traditional enforcement portion is tracked as item 2010-003-01.

Inspection Report# : [2010003](#) (pdf)

**Significance:**  Jun 25, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **NON CONSERVATIVE ACCEPTANCE CRITERIA FOR RHR PUMP PERFORMANCE TESTING**

The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," having very low safety-significance for the licensee's failure to ensure adequate acceptance limits were incorporated into test procedures. Specifically, the licensee failed to properly consider instrument loop uncertainties and allowable emergency diesel generator frequency variance when determining the alert and required action values used in the inservice test procedure for testing of the residual heat removal pumps. Consequently, the acceptance criteria for the lower limits on degradation of pump head were non-conservative. This finding was entered into the licensee's corrective action program and a preliminary calculation performed by the licensee concluded that the pumps were operable.

The finding was more than minor because it was associated with the Mitigating Systems cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the capability of the system to respond to initiating events to prevent undesirable consequences. This finding was of very low safety-significance (Green) because the licensee was able to demonstrate pump operability and therefore there was no loss of safety function. This finding had a cross-cutting aspect in the area of problem identification and resolution because the licensee did not thoroughly evaluate operating experience that included similar issues relating to the failure to appropriately account for instrument uncertainties in design analysis.

Inspection Report# : [2010006](#) (pdf)

**Significance:**  Jun 25, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **INADEQUATE TEST CONTROL OF RHR HEAT EXCHANGERS**

The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," having very low safety-significance for the licensee's failure to establish test conditions to assure that the 1B residual heat removal heat exchanger would perform satisfactorily in service under accident conditions. Specifically, the inspectors determined that the heat exchanger thermal performance test procedure did not assure adequate temperature differences to provide reliable test results. In addition, the most recent test was performed with lower temperature differences than those identified in plant calculations. This finding was entered into the licensee's corrective action program and a preliminary analysis performed by the licensee concluded the test results were acceptable.

The finding was more than minor because it was associated with the design control attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the residual heat removal heat exchanger performance test procedure did not establish appropriate test conditions to ensure that the component would perform its required function during an accident. Also, the inspectors determined that the finding was similar to Examples 3.j and 3.k of IMC 612, Appendix E, in that there was a reasonable doubt of the operability of the component based on the most recent test conditions. The inspectors determined the finding was of very low safety significance (Green) because it was not a design or qualification deficiency, did not represent a loss of system safety function, and did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding did not have a cross-cutting aspect because it did not represent current performance.

Inspection Report# : [2010006](#) (pdf)

**Significance:**  Dec 31, 2010

Identified By: Self-Revealing

Item Type: FIN Finding

**FAILURE TO PERFORM PREVENTATIVE MAINTENANCE OF DIVISION 1 SELF TEST SYSTEM (STS) POWER SUPPLY RESULTS IN SPURIOUS REPOSITIONING OF SAFETY RELATED VALVES.**

A finding of very low safety significance was self-revealed on August 24, 2010, when the Reactor Water Cleanup (RT) System return line outboard primary containment isolation valve went closed. Many other unintended valve repositioning events occurred from August 25 through August 26, 2010. The licensee failed to perform preventative maintenance on the Division 1 Self Test System (STS) safety-related 5 Volt (V) power supply. As a result, a degraded voltage condition existed in the test circuit, which was identified as the cause for the above valve repositioning events. As a corrective action, the licensee has since installed a temporary plant modification of dual 5 V power supplies for all four divisions of the STS. No violation of regulatory requirements was identified.

The finding was of more than minor significance because the failure to perform preventative maintenance on critical components, if left uncorrected, would potentially lead to a more significant safety concern. This finding was of very low safety significance based on answering "no" to each of the Phase 1 screening questions identified in the Containment Barrier column of Table 4a in Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of Findings." The inspectors concluded that this finding affected the cross-cutting area of human performance. Specifically, in the area of resources the licensee did not adequately maintain long term plant safety by the maintenance of design margins, minimizing preventative maintenance deferrals, and ensuring maintenance and engineering backlogs which are low enough to support safety. (IMC 0310 H.2(a))

Inspection Report# : [2010005](#) (*pdf*)

**Significance:** SL-IV Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**FAILURE TO PERFORM AN ADEQUATE 10 CFR 50.59 EVALUATION FOR CPS PROCEDURE 3711.01.**

The inspectors identified a Non-Cited Violation of 10 CFR 50.59, "Changes, Tests and Experiments." The licensee failed to perform an adequate 10 CFR 50.59 evaluation and obtain a license amendment prior to implementing CPS 3711.01, "CPS [Clinton Power Station] Operations with the Potential to Drain the Reactor Vessel [OPDRV]," Revision 0. The procedure established a definition of an OPDRV for use in determining the applicability of several Technical Specification (TS) requirements while in Modes 4 and 5. The licensee failed to recognize that implementing this new procedure, in effect, constituted a change to the TS incorporated into its licensing basis, which would therefore require a license amendment pursuant to 10 CFR 50.59(c)(1)(i) and 10 CFR 50.90. No immediate corrective actions were taken to address this violation; however, the licensee entered this issue into its corrective action program for evaluation.

The violation was of more than minor significance because there was a reasonable likelihood that the change requiring a 10 CFR 50.59 evaluation would require NRC review and approval prior to implementation. Because this issue affected the NRC's ability to perform its regulatory function, the inspectors evaluated it using the traditional enforcement process. Based on the results of a modified Phase 2 SDP evaluation, the underlying technical issue was determined to be of very low safety significance. Consistent with the guidance in Supplement I, Paragraph D.5, of the NRC Enforcement Policy, the violation associated with this finding was determined to be a Severity Level IV Violation.

The related performance deficiency is tracked as item 2010-003-07.

Inspection Report# : [2011010](#) (*pdf*)

Inspection Report# : [2010003](#) (*pdf*)

**Significance:**  Jun 30, 2010

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**FAILURE TO FOLLOW PROCEDURE RESULTING IN GATE SEAL LEAKAGE.**

A finding of very low safety significance with an associated Non-Cited Violation of 10 CFR 50, Appendix B, Criteria V, "Instructions, Procedures, and Drawings," was self-revealed on January 29, 2010, when the dryer cavity gate seal

depressurized during the performance of the containment and reactor vessel isolation functional surveillance procedure. When the seal lost pressure, approximately 46,500 gallons of water leaked from the dryer cavity pool into the reactor cavity. In response to the event, the licensee ensured all personnel were out of the reactor cavity, entered its radioactive spill off-normal procedure, and re-established air pressure to the dryer cavity gate seal. Subsequent investigation revealed that during the gate seal inflation procedure the proper valve operation sequence was not followed. As corrective action, the licensee revised many of its procedures and included a special brief to the refueling outage preparation for Reactor Services personnel.

The finding was of more than minor significance because the licensee's failure to correctly install the upper containment dryer cavity gate could be reasonably viewed as a precursor to a significant event and, if left uncorrected would potentially lead to a more significant safety concern (i.e., increased dose or personnel contamination). In addition, the finding was similar to Example 4c in Inspection Manual Chapter 0612, "Power Reactor Inspection Reports," Appendix E, "Examples of Minor Issues," in that data recorded during installation of the dryer cavity gate seal was incorrect and resulted in backup air bottle supply pressure left outside the acceptable range. Because the dryer cavity gate seal is intended to contain highly radioactive fluids within containment, which supports the radiological barrier functions to protect plant workers and the public following serious transients or accidents, the inspectors concluded that this issue was associated with the Barrier Integrity Cornerstone. Although this event resulted in a loss of inventory from the dryer cavity pool and partial flooding of the lower reactor cavity and drywell, it was determined to be of very low safety significance because there was no loss inventory from the reactor vessel and it could not result in the loss of reactor coolant system level instrumentation. The inspectors concluded that this finding affected the cross-cutting area of human performance. The licensee did not effectively communicate expectations regarding procedural compliance in this instance and, as a result, the Reactor Services maintenance craftsman did not correctly follow the procedure by performing steps out of sequence and restoring a system to service that was incorrectly aligned.

Inspection Report# : [2010003](#) (pdf)

**Significance:** G Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform an Adequate 10 CFR 50.59 Evaluation for CPS Procedure 3711.01 - performance deficiency portion**

The inspectors identified a finding of very low safety significance with an associated NCV of 10 CFR 50.59, "Changes, Tests and Experiments." The licensee failed to perform an adequate 10 CFR 50.59 evaluation and obtain a license amendment prior to implementing CPS 3711.01, "CPS [Clinton Power Station] Operations with the Potential to Drain the Reactor Vessel [OPDRV]," Revision 0 on January 11, 2010. The procedure established a definition of an OPDRV for use in determining the applicability of several TS requirements while in Modes 4 and 5. The licensee failed to recognize that implementing this new procedure, in effect, constituted a change to the TS incorporated into its licensing basis, which would, therefore, require a license amendment pursuant to 10 CFR 50.59(c)(1)(i) and 10 CFR 50.90. No immediate corrective actions were taken to address this finding; however, the licensee entered this issue into its corrective action program for evaluation.

The finding was of more than minor significance because there was a reasonable likelihood that the change requiring a 10 CFR 50.59 evaluation would require NRC review and approval prior to implementation. The inspectors assessed the significance of the underlying issue using the SDP. Based on the results of a modified Phase 2 SDP evaluation, this finding was determined to be of very low safety significance. The inspectors concluded that this finding affected the cross cutting area of human performance. Specifically, the licensee did not use conservative decision making to demonstrate that the proposed action did not require prior NRC approval. The inspectors noted that the licensee was aware of potential concerns regarding the new procedure prior to completing the initial 10 CFR 50.59 evaluation and again prior to revising the evaluation in response to concerns raised by the inspectors; however, the incorrect conclusion was reached in both revisions of the evaluation that the new procedure was not a change to the TS and that a license amendment was not necessary.

The associated traditional enforcement is tracked as item 2010-003-02.

Inspection Report# : [2010003](#) (pdf)

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## Emergency Preparedness

**Significance:** **G** Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **INADEQUATE EMERGENCY PLAN AUGMENTATION CALL-IN DRILLS**

The inspectors identified a finding of very low safety significance with an associated Non-Cited Violation of 10 CFR 50.54(q) for the licensee's failure to follow and maintain the Emergency Plan, which meets the standards in 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50. Specifically, the licensee's Emergency Plan calls for the performance of periodic drills to evaluate the ability to augment its Emergency Response Organization (ERO).

However, the Emergency Plan implementing procedure used for the conduct of these augmentation drills exempts certain ERO members from participation in these drills, a situation which prevents the licensee from fully demonstrating its ability to augment all the ERO positions in a timely manner. The licensee's approved Emergency Plan does not provide for such an exemption. The licensee entered the finding into the corrective action program.

The use of an implementing procedure that causes the conduct of an activity to be inconsistent with the associated requirements in the licensee's Emergency Plan results in a failure to follow and maintain the Emergency Plan and is a performance deficiency. As a result of the limitations in the procedure, the licensee failed to conduct call-in drills to demonstrate timely augmentation of ERO positions filled by skilled/technical personnel. The deficiency did not impact the NRC's regulatory process or contribute to actual safety consequences; therefore, the performance deficiency was screened using the Emergency Preparedness Significance Determination Process as a failure to comply. The deficiency was determined to be more than minor because the deficiency adversely affected the Emergency Preparedness Cornerstone objective and had the attribute associated with ERO readiness and in the area of ERO augmentation testing. The inspector evaluated the finding using the Inspection Manual Chapter 0609, Appendix B, Sheet I, "Failure to Comply" Flowchart. The inspector evaluated the finding as a degraded planning standard function since the licensee's conduct of the augmentation exercises did not include all ERO positions. The finding was determined to be of very low safety significance. Because the finding did not reflect current licensee performance, no cross-cutting aspect was identified.

Inspection Report# : [2010003](#) (*pdf*)

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## Occupational Radiation Safety

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## Public Radiation Safety

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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 : June 07, 2011