

# Point Beach 2

## 1Q/2011 Plant Inspection Findings

---

### Initiating Events

**Significance:**  Mar 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure To Perform Required Ultrasonic Exam In Accordance With Procedures**

On March 3, 2010, the inspectors identified a finding of very low safety significance and a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for a vendor examiner's failure to follow procedure instructions and perform required circumferential ultrasonic scans of two elbow-to-pipe containment spray line welds. The licensee subsequently performed the scans with no relevant indications detected and documented the failure to perform the scans in the corrective action system.

The finding was determined to be more than minor because, if left uncorrected, the failure to perform the weld examinations could become a more significant safety concern. Absent NRC identification, the licensee would not have performed the full required exam of the weld for an indefinite period of service which would have placed the reactor coolant pressure boundary at increased risk for undetected cracking, leakage, or component failure. This finding was of very low safety significance based on the inspectors answering "No" to the Phase 1 screening question identified in the Containment Barrier column of Table 4a in Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," dated January 10, 2008, of Inspection Manual Chapter 0609, "Significance Determination Process." This finding has a cross-cutting aspect in the area of human performance, work practices, because the licensee failed to effectively communicate expectations regarding procedural compliance. Specifically, the failure to perform required circumferential examinations occurred because the licensee's management staff did not adequately stress or enforce procedure adherence for this activity. In particular, procedure NDE-173 was issued as an "Informational Use" type procedure that allowed licensee staff to rely on memory to perform the procedural steps.

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

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO FOLLOW PROCEDURES NEEDED TO MAINTAIN EQUIPMENT OPERABILITY WITH HAZARD BARRIERS OUT-OF-SERVICE.**

A finding of very low safety significance and associated Non-Cited Violation of 10 CFR 50, Appendix B, Criterion V, "Instructions Procedures, and Drawings," was identified by the inspectors for the licensee's failure to follow procedural/instructional guidance contained in a temporary procedure for the maintenance of high energy line break (HELB) barriers. Specifically, on June 25, 2010, the licensee placed a wedge under the control room door, a HELB barrier, contrary to the guidance contained in Operations Notebook procedure/instruction, "HELB Barrier/Vent Path Temporary Guidance." The licensee entered this item into its corrective action program.

This performance deficiency was more than minor because it was associated with the Initiating Events Cornerstone attribute of equipment performance and adversely affected the cornerstone objective of ensuring the availability and reliability of equipment needed to limit the likelihood of those events that upset plant stability and challenge critical safety functions during power operations. Specifically, the failure to maintain the control room door available as a supporting structure, system, or component (SSC) for control room equipment availability/operability during a HELB impacted the reliability and the operability of affected control room SSCs. The finding screened as having very low safety significance (Green) because of its short exposure, approximately 0.5 hours. The finding had a cross cutting aspect in the area of human performance, work practices, because the licensee's staff was familiar with and had been briefed on , "HELB Barrier/Vent Path Temporary Guidance" in the Operations Notebook yet had failed to implement human error prevention techniques such as pre job briefing or peer checking, which, if performed, could have ensured that maintenance on the control room door was performed as required by the operations notebook procedure (H.4(a)).

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

---

## Mitigating Systems

**Significance:**  Mar 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure To Maintain Internal Flood Protection Features On Emergency Diesel Generators G 01 And G 02 Control Cabinets**

A finding of very low safety significance and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the failure of the licensee from 1995 through January 20, 2011, to correctly translate the applicable regulatory requirements and the design basis into specifications, procedures, and instructions. Specifically, the licensee modified the control cabinets of emergency diesel generators G-01 and G-02 in 1995 without the appropriate internal flood protection design features. The licensee initiated condition report AR01610979, took immediate corrective actions to correct the deficient conditions, and performed an apparent cause evaluation. At the end of the inspection period, the licensee continued to implement planned corrective actions that included establishment of preventive maintenance activities to perform flooding seal inspections and extent of condition evaluations to ensure all potential design and licensing basis flooding issues were identified and resolved.

The finding was determined to be more than minor because it was associated with the Mitigating Systems Cornerstone attribute of design control and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the licensee failed to ensure that internal flood protection features used to mitigate a design basis accident were maintained. The inspectors determined the finding was of very low safety significance because it was a design or qualification deficiency confirmed not to result in a loss of operability or functionality. The inspectors determined that this finding did not reflect current performance since the error was introduced in a design change that was greater than three years old; therefore, there was no cross-cutting aspect associated with this finding.

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

**Significance:**  Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Inadequate Safety System Venting Procedure Void Assessment Requirements**

A finding of very low safety significance and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the licensee's failure to establish adequate instructions or appropriate acceptance criteria to ensure that voids vented from safety related piping were evaluated for their effects on system operability. The licensee entered the issue into its corrective action program, performed a condition evaluation, and took actions to revise the deficient procedure.

The issue was more than minor because the lack of procedural controls for void monitoring and assessment resulted in a condition where there was reasonable doubt that the past operability of the system was properly assessed, and that these observations, if left uncorrected, could lead to a condition where an inoperable system or gas intrusion mechanisms would not be identified or corrected. The finding was of very low safety significance, because the inspectors answered "no" to all of the questions in the Mitigating Systems Cornerstone column of the Significance Determination Process worksheet. The inspectors determined that the finding has a cross cutting aspect in the area of human performance, decision making, because the interdisciplinary nature of the observations reflected a lack of a systematic process during the development and execution of the related procedure (H.1(a)).

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

**Significance:**  Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Perform Ultrasonic Assessment of Safety System Voids as Required by Procedure**

A finding of very low safety significance and associated non cited violation of 10 CFR Part 50, Appendix B, Criterion

V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the licensee's failure to perform ultrasonic testing on safety related systems for void assessment as required by the licensee's gas accumulation management program. The licensee entered the issue into its corrective action program and has begun the required ultrasonic testing.

The issue was more than minor because the lack of procedural controls for void monitoring and assessment resulted in a condition where there was reasonable doubt that the past operability of the system was properly assessed, and that these observations, if left uncorrected, could lead to a condition where an inoperable system or gas intrusion mechanisms would not be identified or corrected. The issue was determined to be of very low safety significance because the inspectors answered "no" to all of the questions in the Mitigating Systems Cornerstone column of the Significance Determination Process worksheet. The inspectors determined that the finding has a cross cutting aspect in the area of human performance, work practices, because the licensee failed to provide sufficient oversight to ensure that the procedure was followed (H.4(c)).

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

**Significance:**  Dec 31, 2010

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **Multiple ESFAS Steam Line Pressure Channel Modules Inoperable Due to Inadequate Calibration**

#### **Instructions**

A finding of very low safety significance and associated non cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was self-revealed for the failure to have adequate maintenance procedures for calibrating the engineered safety features actuation system steam line pressure dynamic compensation modules. Specifically, since the basis calculation for determining the settings of the lead/lag values for the modules did not address dynamic settings, and the proceduralized tolerances were too restrictive, the calibration instructions were inadequate to ensure the modules' ability to perform in accordance with technical specification requirements. Upon discovery, the licensee entered the issue into its corrective action program and performed an apparent cause evaluation that documented a number of planned program and procedural enhancements.

The finding was more than minor because it is associated with the equipment performance attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding was determined to be of very low safety significance because there was no design deficiency, no actual loss of safety function, no single train loss of safety function for greater than the technical specification allowed outage time, and no risk due to external events. The finding does not have a cross cutting aspect because the performance deficiency occurred outside of the 3-year window considered to be representative of present performance.

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

**Significance:** SL-IV Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Document a 10 CFR 50.59 Evaluation For Changes Made to Procedure OI-38, Circulating Water System Operation**

A Severity Level IV non cited violation of 10 CFR 50.59(d)(1), "Changes, Tests, and Experiments," was identified by the inspectors for the failure to document an evaluation that provided a basis for the determination that the changes made to procedure OI 38, "Circulating Water System Operation," did not require a license amendment. Specifically, the licensee failed to provide an evaluation that adequately documented that differences between the procedure changes modifying the operational configuration of the condenser steam dump system and operational considerations and design assumptions outlined within the final safety analysis report and the basis of technical specifications were acceptable. As part of its corrective action, the licensee revised the procedure to remove the original change to the operational configuration of the steam dump system.

The violation was determined to be more than minor because the inspectors could not reasonably determine that the changes would not have ultimately required prior NRC approval. Violations of 10 CFR 50.59 are dispositioned using the traditional enforcement process instead of the Reactor Oversight Process Significance Determination Process (SDP) because they are considered to be violations that could potentially impede or impact the regulatory process. The

underlying technical issue was evaluated under the SDP to determine the significance of the violation with respect to core damage probability. The issue screened as having very low safety significance because the inspectors answered “no” to all of the questions in the SDP worksheet. The finding has a cross cutting aspect in the corrective action program element of problem identification and resolution because the licensee failed to thoroughly evaluate questions regarding differences between the plant operational configuration and assumptions in the current licensing basis when they did not complete a prompt operability evaluation to assess noted operational disparities (P.1(c)).

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

**Significance:**  Dec 31, 2010

Identified By: NRC

Item Type: FIN Finding

**Failure to Document a 10 CFR 50.59 Evaluation For Changes Made to Procedure OI-38, Circulating Water System Operation**

A Severity Level IV non cited violation of 10 CFR 50.59(d)(1), “Changes, Tests, and Experiments,” was identified by the inspectors for the failure to document an evaluation that provided a basis for the determination that the changes made to procedure OI 38, “Circulating Water System Operation,” did not require a license amendment. Specifically, the licensee failed to provide an evaluation that adequately documented that differences between the procedure changes modifying the operational configuration of the condenser steam dump system and operational considerations and design assumptions outlined within the final safety analysis report and the basis of technical specifications were acceptable. As part of its corrective action, the licensee revised the procedure to remove the original change to the operational configuration of the steam dump system.

The violation was determined to be more than minor because the inspectors could not reasonably determine that the changes would not have ultimately required prior NRC approval. Violations of 10 CFR 50.59 are dispositioned using the traditional enforcement process instead of the Reactor Oversight Process Significance Determination Process (SDP) because they are considered to be violations that could potentially impede or impact the regulatory process. The underlying technical issue was evaluated under the SDP to determine the significance of the violation with respect to core damage probability. The issue screened as having very low safety significance because the inspectors answered “no” to all of the questions in the SDP worksheet. The finding has a cross cutting aspect in the corrective action program element of problem identification and resolution because the licensee failed to thoroughly evaluate questions regarding differences between the plant operational configuration and assumptions in the current licensing basis when they did not complete a prompt operability evaluation to assess noted operational disparities (P.1(c)).

The Traditional Enforcement item associated with this item is tracked as NCV 2010005-06.

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

**Significance:**  Sep 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Identify Hydrogen Fire Hazards on Pre-Fire Plan**

A finding of very low safety significance and associated non-cited violations of a license condition was identified by the inspectors for the failure to identify hydrogen fire hazards on a pre fire plan. Specifically, the licensee failed to identify that a compressed gas cylinder in the Unit 1 sample room contained hydrogen and that the Volume Control Tank valve galleries contained hydrogen piping. The licensee entered this issue into their corrective action program and revised the pre fire plan to reflect the identified hydrogen fire hazards.

The finding was determined to be more than minor because failure to identify hydrogen fire hazards in the pre fire plan could impact the fire brigade’s ability to effectively fight a fire due to the unique hazards associated with hydrogen. The inspectors determined that the finding was of very low safety significance because the fire brigade consisted of plant operators familiar with the 46-foot elevation of the auxiliary building and associated hazards. This finding 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). No cross cutting aspects associated with this finding were identified. (Section 1R05)

Inspection Report# : [2010004](#) (pdf)

**Significance:**  Sep 30, 2010

Identified By: NRC

Item Type: FIN Finding

**Inadequate Acceptance Criteria for Fire Door Surveillance Procedure**

A finding of very low safety significance was identified by the inspectors for the failure to provide appropriate acceptance criteria for the fire door surveillance procedure. Specifically, the acceptance criteria for fire door functionality did not specify that doors, when opened, returned to the closed and latched position. The licensee entered this issue into their corrective action program and planned to revise the surveillance procedure.

The finding was determined to be more than minor because if left uncorrected, the failure to have appropriate acceptance criteria would become a more significant safety concern. Specifically, the lack of appropriate fire door functionality acceptance criteria could result in a nonfunctional door closing mechanism and a degraded fire barrier not being detected during surveillance activities. The inspectors determined that the finding was of very low safety significance because the inspectors did not identify any instances where a fire door was left open or unlatched, or an instance where a fire door which would not close on its own and was not monitored for closure. Consequently, the inspectors determined that the finding represented a low degradation and, as such, this finding screened as Green.

This finding 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). This finding has a cross-cutting aspect in the area of human performance, work practices, because the licensee's failure to follow procedures, such as the procedure writers' guide, resulted in the failure to provide appropriate acceptance criteria for the fire door surveillance procedure (H.4(b)).

Inspection Report# : [2010004](#) (*pdf*)

**Significance:**  Sep 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Ensure That RHR Would Be Capable to Respond to a Loss of Cooling Accident at Mode 4**

The inspectors identified a Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," having very low safety significance for the failure to ensure that residual heat removal (RHR) system would be capable to respond to a loss of coolant accident that initiates in Mode 4. Specifically, the residual heat removal system could experience flash evaporation during a loss of coolant accident at this Mode resulting in steam binding of the system pumps and/or an adverse waterhammer. The licensee entered this issue into the corrective action program and will make procedure changes to ensure the operability of at least one RHR train while in Mode 4.

The performance deficiency was determined to be more than minor because it was associated with the mitigating system cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the capability of systems that respond to initiating events to prevent undesirable consequences. The finding screened as very low safety significance because a Phase II evaluation determined that it represented a change in core damage frequency of less than 5 E-9. The inspectors determined that this finding did not have a cross-cutting aspect.

Inspection Report# : [2010004](#) (*pdf*)

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Enter Abnormal Operating Procedure During Tornado Warning**

A finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the licensee's failure to implement a required abnormal operating procedure (AOP) during a period of impending severe weather. Specifically, the licensee failed to enter AOP 13C, "Severe Weather Conditions," during a tornado warning issued by the National Weather Service for the specific location of the plant. The licensee immediately entered the issue into its corrective action program and conducted an apparent cause evaluation of the conditions.

This performance deficiency was more than minor because it was associated with the Mitigating Systems Cornerstone

attribute of protection against external events and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). The finding was determined to be of very low safety significance (Green) because it did not involve the loss or degradation of equipment or function specifically designed to mitigate a seismic, flooding, or severe weather initiating event (e.g., seismic snubbers, flooding barriers, tornado doors), and did not involve the total loss of any safety function. This finding has a cross cutting aspect in the area of human performance, resources, because the licensee did not ensure that personnel, equipment, procedures, and other resources were available and adequate to assure nuclear safety. Specifically, the entry conditions in AOP 13C were out of date and failed to provide an adequate nexus between the purpose and instructions of the procedure (H.2(c)).

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

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Control the Design of Partially Installed Modifications for Seismic Requirements**

A finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the failure of the licensee's modification process to ensure that new 480 volt cables, installed for the future repowering of various auxiliary feedwater (AFW) system motor operated valves, were installed in accordance with applicable regulatory requirements. Specifically, a seismic design evaluation was not completed prior to the installation of a cable coil suspended above the 2MS 2020 valve, 2P 29 turbine driven AFW pump steam supply. In response to this issue, the licensee installed more robust restraints that satisfied seismic acceptability criteria and performed an evaluation that showed the interim condition of the modification did not challenge operability. At the conclusion of this inspection period, the licensee was in the process of conducting a root cause evaluation. The inspectors also noted that a very similar issue at this site resulted in the issuance of a NCV in the second quarter of 2009.

This performance deficiency was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of design control and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, once identified, the modification required rework to comply with applicable design requirements. The inspectors determined the finding was of very low safety significance (Green) because the issue did not result in the actual loss of a safety function. The inspectors also determined the finding has a cross cutting aspect in the area of problem identification and resolution, corrective action program, because the licensee failed to implement appropriate corrective actions for a previous violation with the same performance deficiency (P.1(d)).

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

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **PROCEDURES WERE NOT APPROPRIATE TO ADEQUATELY VERIFY AND DOCUMENT THE DESIGN OF NEW OR MODIFIED SSCs WITH RESPECT TO SEISMIC II/I INTERACTIONS.**

A finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the failure to provide procedures that were appropriate to verify and document the design of new or modified SSCs with respect to seismic II/I interactions. Specifically, the procedures used for seismic II/I interaction evaluations of new or modified SSCs did not provide guidance for evaluating equipment that was not represented in the earthquake experience or generic testing equipment classes under the scope of the Seismic Qualification Utility Group methodology. Also, no formal guidance was incorporated in modification and seismic procedures to document seismic II/I interaction evaluations. As a result, the licensee did not perform an evaluation that was in accordance with the licensing basis to verify the design of the "B" containment sump strainers of Units 1 and 2 with respect to potential seismic II/I interactions. The licensee entered this issue into its corrective action program.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating Systems Cornerstone attribute of protection against external events and adversely affected the cornerstone objective of

ensuring the capability of systems that respond to initiating events to prevent undesirable consequences. This finding was of very low safety significance (Green) because it was a qualification deficiency confirmed not to result in loss of operability or functionality. The inspectors determined that the finding had a cross cutting aspect in the area of problem identification and resolution, self and independent assessments, because the licensee did not conduct self assessments of the Seismic Qualification Utility Group program (P.3(a)).

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

---

## Barrier Integrity

**Significance:**  Mar 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

### **Unacceptable Preconditioning Of Technical Specification Required Surveillance Test**

A finding of very low safety significance and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," was identified by the inspectors for the licensee's unacceptable preconditioning of a technical specification required surveillance test on September 14, 2010, and January 18, 2011. Specifically, by performing procedure PC 97, Part 7, service water flushes of the Unit 2 containment fan cooler (CFC) units prior to the performance of the fan cooler units' monthly surveillance tests, the licensee failed to ensure that work activities were sequenced in a manner that preserved the as found conditions of the structure, system, and component (SSC), which constituted unacceptable preconditioning. Upon notification from the inspectors of this issue, the licensee initiated a condition report and subsequently performed a condition evaluation that proposed permanent corrective actions such as procedure changes to explicitly prohibit such sequencing of activities. Additionally, in the interim, the licensee immediately communicated to its operators the need to sequence the activities appropriately.

The finding was determined to be more because it was associated with the Barrier Integrity Cornerstone attribute of SSC and Barrier Performance and adversely affected the cornerstone objective of providing reasonable assurance that physical design barriers (containment, in this case) protect the public from radionuclide releases caused by accidents or events. Specifically, because the preconditioning altered the as found condition of the CFCs, the data collected through the performance of the procedure TS 34 surveillance tests were not fully indicative of the true equipment performance trends of the CFCs. Therefore, this performance deficiency had a direct effect on the licensee's ability to fully assess the past operability of the system, as well as the ability to trend as found data to assess the reliability of the CFCs. The inspectors determined that the finding has a cross-cutting aspect in the area of human performance, work control, because the licensee did not appropriately coordinate work activities by failing to incorporate actions to address the impact of work on different job activities.

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

---

## Emergency Preparedness

---

## Occupational Radiation Safety

---

## Public Radiation Safety

---

## 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.

---

## Miscellaneous

**Significance:** SL-IV Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Submit Licensee Event Report per 10 CFR 50.73(a)(2)(v)(A) and (D).**

A Severity Level IV non cited violation of 10 CFR Part 50.73(a)(2)(v)(A) and (D) was identified by the inspectors for the failure of the licensee to report an event or condition that could have prevented the fulfillment of the auxiliary feedwater and safety injection safety functions, which are relied upon to shutdown the reactor and maintain it in a shutdown condition, and mitigate the consequences of an accident. Specifically, the licensee had not properly controlled the blocking open of doors that served as high energy line break barriers. The licensee entered the violation into its corrective action program as condition report 01616620 and revise the procedure on control of high energy line break barriers.

Violations of 10 CFR 50.73 are considered to be violations that potentially impact the regulatory process and are dispositioned using the traditional enforcement process instead of the Reactor Oversight Process Significance Determination Process. A cross-cutting aspect was not assigned to this violation.

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

Last modified : June 07, 2011