South Texas 2
1Q/2012 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Dec 31, 2011
Identified By: NRC
Item Type: NCV NonCited Violation
Inadequate Design Change on Class 1E 4160 Vac ESF Transformers
The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criteria III, “Design Control,” for the failure to ensure that design standards were correctly translated into drawings, procedures, and instructions. Specifically, the design specifications of the Class 1E 4160 Vac buses were not maintained with the installation of a new transformer. The root cause investigation determined that the design change package that installed the new transformers on Units 1 and 2 in October 2009 and April 2010, respectively, was not modeled correctly. The licensee captured this event as Condition Report 11-10205 and implemented immediate compensatory measures of increased monitoring on the Class 1E 4160 Vac buses by implementing temporary logs to ensure that the Class 1E loads were within their technical specifications surveillance procedure acceptance criteria until the new design change package could be implemented on each unit.

The finding was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of Design Control and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inadequate design change package resulted in the licensee declaring the Unit 2 Class 1E 4160 Vac E2B bus inoperable because it was outside of the technical specification surveillance procedure acceptance criteria for longer than allowed by technical specifications. The inspectors performed the significance determination using NRC Inspection Manual Chapter 0609, Attachment 0609.04, “Phase 1 – Initial Screening and Characterization of Findings,” dated January 10, 2008, because it affected the Mitigating Systems Cornerstone while the plant was at power. The finding was determined to be of very low safety significance because it was a design deficiency that did not result in a loss of functionality per Part 9900 Technical Guidance, “Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety,” dated April 16, 2008. In addition, this finding had human performance cross-cutting aspects associated with work practices in that the licensee did not ensure supervisory and management oversight of work activities, including contractors, such that nuclear safety was supported [H.4(c)].
Inspection Report# : 2011005 *(pdf)*

Significance: G Sep 30, 2011
Identified By: NRC
Item Type: NCV NonCited Violation
Inadequate Corrective Actions from an Inadequate Extent of Condition Review
The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criteria XVI, “Corrective Action,” for the failure to assure that conditions adverse to quality were promptly identified and corrected. Specifically, the licensee did not promptly identify and correct improperly installed temperature switches. On October 28, 2010, the Unit 2 essential cooling water vent fan 21A failed because the control power fuse blew due to an unused uninsulated wire. The root cause investigation determined that the unused wire had been installed when the switch was replaced in February 2005. The extent of condition review identified that a total of 60 switches had been replaced, but only one additional switch was verified and it also had an unused uninsulated wire. After inspector questioning, the licensee inspected the 12 actuation switches and determined that only the Unit 2 essential cooling water vent fans for trains A and C were affected. The licensee’s corrective actions included: performing an immediate and prompt operability,

performing training with the maintenance personnel on the procedural requirements for unused wires, and scheduling the inspection of the 48 high/high temperature switches commensurate with risk significance.

This finding was more than minor because it was associated with the Mitigating Systems Cornerstone attributes of Design Control, Equipment Performance, and Human Performance and it affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The deficiency resulted in a potential inoperability of Unit 2 essential cooling water trains A and C since 2005. The senior resident inspector performed the initial significance determination for the essential cooling water issue using the NRC Inspection Manual Chapter 0609, Attachment 0609.04, "Phase 1 – Initial Screening and Characterization of Findings." The finding screened to a Phase 2 significance determination because it involved an actual loss of safety function of two single trains of equipment for greater than the technical specification allowed outage time. A Region IV senior reactor analyst attempted to perform a Phase 2 significance determination using the pre-solved worksheets, but the Phase 2 process was not well suited for this issue. Therefore, the senior reactor analyst performed a bounding Phase 3 significance determination and found the finding to be of very low safety significance. The dominant core damage sequence included: seismic initiated loss of offsite power, failure of the essential cooling water trains A and C, failure of the train B emergency diesel generator, and failure to recover the diesel or offsite power in 4 hours. The low frequency of seismic induced loss of offsite power events at South Texas Project and the unaffected train B essential cooling water train helped to mitigate the finding's significance. In addition, this finding had human performance cross-cutting aspects associated with decision-making, in that, the licensee failed to use conservative assumptions and verify the validity of the underlying assumptions [H.1(b)].
Inspection Report# : 2011004 *(pdf)*

Significance:  Sep 30, 2011
Identified By: NRC
Item Type: NCV NonCited Violation
Untimely Corrective Action to Correct an Inadequate Procedure
The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criteria XVI, "Corrective Action," for the failure to assure that conditions adverse to quality were promptly identified and corrected. Specifically, the inspectors determined that operations had no instructions for manual control of the 4160 Vac load tap changing transformers. Procedure 0POP02-AE-0002, "Transformer Normal Breaker and Switch Lineup," was not revised providing these instructions. In December 2010, Unit 2 experienced a material issue with the load tap changer, which required operations to take manual control of the load tap changer without procedure guidance. Subsequently, the licensee issued an operation's standing order to allow for manual operations, but did not revise the procedure. In May 2011, the licensee experienced another material condition issue with the Unit 2 load tap changer that required operations to take manual control of the load tap changer, but since the procedure was never revised, operations found themselves operating the plant outside of procedures again. Corrective actions included revising Procedure 0POP02-AE-0002, to include manual operation of the load tap changer, and training all the operations personnel on the new procedure.

This finding was more than minor because it was associated with the Mitigating Systems Cornerstone attributes of Design Control and Procedure Quality, and it affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The deficiency resulted in operations not having any guidance on how to control the Units 1 and 2 train B 4160 Vac transformer load tap changer to ensure that the bus remained within technical specification surveillance requirement voltage limits. The inspectors performed the significance determination using NRC Inspection Manual Chapter 0609, Attachment 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," dated January 10, 2008, because it affected the Mitigating Systems Cornerstone while the plant was at power. The finding was determined to be of very low safety significance because it was not a design or qualification deficiency; it did not represent a loss of safety system function; it did not represent the loss of a single train for greater than technical specification allowed outage time; it did not represent a loss of one or more non-technical specification risk-significant equipment for greater than 24 hours; and it did not screen as potentially risk significant due to seismic, flooding, or severe weather. In addition, this finding had human performance cross-cutting aspects associated with decision making, in that, the licensee failed to communicate decisions and the basis for decisions to personnel who have a need to know the information to perform work safely [H.1(c)].
Inspection Report# : 2011004 *(pdf)*

Significance: G Jul 01, 2011
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to Timely Correct Conditions Adverse to Fire Protection
The team identified a noncited violation of License Condition 2.E for the failure to implement and maintain in effect all provisions of the approved fire protection program. Specifically, the team identified two examples of failure to implement timely corrective actions to correct conditions adverse to fire protection. The first example related to making Procedure 0POP04-ZO-0001, "Control Room Evacuation," Revision 33, consistent with the post-fire safe shutdown analysis in order to ensure the actions met critical time requirements. The second example related to not correcting a condition that could disable all three fire pumps simultaneously as a result of fire damage.

Failure to implement timely corrective actions in two instances for conditions adverse to fire protection is a performance deficiency. Both examples of this finding are of greater than minor significance because they impacted the Mitigating Systems cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events (fire) to prevent undesirable consequences. A senior reactor analyst performed Phase 3 significance determination for both examples. The analyst calculated the risk associated with the first example for the actions taken outside the control room as 2.702E-7. For the second example, the analyst assumed that a fire in Fire Area 67 would damage the electrical control cables for all three fire pumps and require manually starting a fire pump at the fire pump house. However, it was determined that a delay in fire suppression because of the need to use a fire hose would not result in a plant transient, require evacuation of the control room, or result in damage to any systems and components required for post-fire safe shutdown. Therefore, the senior reactor analyst determined that both examples of this finding are of very low safety significance (Green). The licensee entered this deficiency into the corrective action program as Condition Record 11-10905.

These examples of the performance deficiency had a crosscutting aspect in the area of human performance associated with resources because the licensee did not ensure that resources assigned to correct these deficiencies were adequate to assure nuclear safety. Specifically, the licensee failed to ensure adequate design margins by (1) failing to ensure that operators could perform all necessary manual actions prior to exceeding the regulatory requirements and (2) failing to modify the control circuits for the fire pumps to protect them against fire damage [H.2(a)].

Inspection Report# : 2011006 *(pdf)*

Significance: G Jun 30, 2011
Identified By: NRC
Item Type: NCV NonCited Violation
Inadequate Fire Protection System Functionality Procedure Results in Failure to Establish Fire Watches
The inspectors identified a noncited violation of license condition 2.E, "Fire Protection Program," because of an inadequate procedure that resulted in the licensee failing to establish compensatory fire watches in eight fire zones with degraded fire detection equipment. On March 2, 2011, the inspectors reviewed fire impairments to ensure adequate compensatory actions were being implemented. The inspectors identified that fire watches were not implemented in several areas where the fire detection system was degraded because Procedure 0PGP03-ZF-0018, "Fire Protection System Functionality Requirements," Revision 14, did not require a fire watch until greater than 50 percent of the fire detection functionality within the fire zone was degraded. The inspectors determined that the licensee failed to correctly copy the licensing basis NUREG-0452 technical specification requirements into the procedure. The licensee's corrective actions included: (1) posting an hourly fire watch; (2) changing the procedure to correctly reflect licensing basis requirements; and (3) providing training to fire safety and operations personnel.

The finding was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of procedure quality and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences, because the lack of compensatory measures could result in a delayed response to a fire. The inspectors performed the significance determination using NRC Inspection Manual Chapter 0609, Appendix F, dated February 28, 2005, because the finding affected fire protection defense-in-depth strategies, as described in NRC Inspection Manual Chapter 0609.04, Table 3b, "Phase 1 - Initial Screening and Characterization of Findings," dated January 10, 2008. The finding was assigned to the fixed fire protection systems category with a degradation rating of moderate because compensatory measures were not in place

for unoccupied fire areas that had greater than 10 percent degradation of fire detection equipment. Because the finding was a programmatic weakness where multiple fire areas lacked compensatory measures and it had a moderate degradation rating, the finding required a Phase 3 analysis be performed by a senior reactor analyst.

The senior reactor analyst determined that the finding was of very low safety significance because there were no identified dominant core damage sequences, and, therefore, there was no quantifiable change to the core damage frequency. The functional fire detectors helped to mitigate the risk. This finding did not have cross-cutting aspects because the licensee had not made changes to this procedural requirement within the last 3 years, and therefore, was not indicative of current licensee performance.
Inspection Report# : 2011003 *(pdf)*

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Significance: G Dec 31, 2011
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to Follow Procedures and Maintain Doses ALARA
On November 1, 2011, the inspectors identified a non-cited violation of Technical Specification 6.8.1.a, for the failure to follow procedures and minimize occupational doses during an outage maintenance activity for the disassembly of the Unit 2 reactor head. Specifically, Work Activity Number 376357 was not properly planned and managed, which resulted in unplanned worker dose. This work activity for the disassembly of the Unit 2 old reactor vessel closure head during the Unit 2 spring 2010 outage had a projected dose of 8.396 rem. However, the job ended with an actual collective dose of 14.072 rem. This exceeded the dose estimate by 68 percent. The licensee addressed this issue in the corrective action program as Condition Reports 10-6669, 10-7863, and 11-29161.

This finding is more than minor because it affected the Occupational Radiation Safety Cornerstone attribute of Program and Process, in that, failure to follow ALARA procedures caused increased collective radiation dose for the job activity to exceed 5 person-rem and exceeded the planned dose by more than 50 percent. Using the Occupational Radiation Safety Significance Determination Process, the inspectors determined this finding to be of very low safety significance because although it involved ALARA planning and controls, the licensee's latest rolling 3-year average does not exceed 135 person-rem per unit. Furthermore, the finding had an associated cross-cutting aspect in the area of human performance, work control component because the licensee did not fully incorporate risk insights, job site conditions, plant structures, systems, and components, and radiological safety, as well as the need for planned contingencies to maintain doses ALARA [H.3(a)].
Inspection Report# : 2011005 *(pdf)*

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

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