

## Sequoyah 2

### 3Q/2012 Plant Inspection Findings

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#### Initiating Events

**Significance:**  Mar 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

##### **Failure to Implement Procedures for Tornado Watch/Warning**

The inspectors identified a noncited violation of Units 1 & 2 Technical Specification of 6.8.1.a for the licensee's failure to adequately implement procedure AOP-N.02, "Tornado Watch/Warning," Revision 28. On March 2, 2012, the licensee entered AOP-N.02 due to a tornado watch/warning and failed to secure or remove loose material in the Switchyard/Transformer Yard as required by the procedure.

This issue was entered into the licensee's corrective action program as Problem Evaluation Report (PER) 515684.

Inspection Report# : [2012002](#) (*pdf*)

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#### Mitigating Systems

**Significance:**  Jun 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

##### **Failure to Evaluate Fire Drill**

The inspectors identified a noncited violation of Units 1 & 2 Technical Specification 6.8.1.f for the licensee's failure to implement procedures required for fire protection program implementation. Specifically, the licensee failed to evaluate six minimum critical objectives on December 5, 2011, during a fire drill as required by TVA-SPP-17.16, Conduct and Evaluation of Fire Drills, revision 0. This issue was entered into the licensee's corrective action program as Problem Evaluation Reports (PERs) 538996, 568242, and 568248.

The performance deficiency was determined to be greater than minor because it was associated with the protection against external events attribute of the mitigating systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the lack of adequate drill performance could negatively affect the fire brigade's capability to combat a fire. Findings associated with performance of the fire brigade are not evaluated using IMC 0609, Attachment F, "Fire Protection Significance Determination Process," and Appendix M, "Significance Determination Process Using Qualitative Criteria," as described in NRC Inspection Manual Chapter 0609.04, Table 3b, "Phase 1 - Initial Screening and Characterization of Findings." The NRC concluded that the finding was of very low safety significance (Green) because the defense-in-depth attribute of the fire brigade was minimally affected, in that, the evaluated crew was only one of four crews of the site fire brigade team, the other crews had adequately been evaluated, and that the overall condition of the fire detection and suppression systems has been satisfactory. The finding was determined to have a crosscutting aspect in the area of Problem Identification and Resolution because of inadequate oversight and self-assessment of fire operations department activities, specifically fire brigade training.

[P.3(a)] (Section 1R05)

Inspection Report# : [2012003](#) (*pdf*)

**Significance:**  Mar 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Meet Fire Drill Training Requirements**

The inspectors identified a noncited violation of facility operating license DPR-77 condition 2.C.(16) and facility operating license DPR-79 condition 2.C.(13) for failure to implement and maintain in effect all provisions of the approved fire protection program. Specifically, Sequoyah's Fire Protection Report Part II, Section 9.3.b.2 – Fire Drills requires a minimum of one drill per shift every calendar quarter, a minimum on one unannounced drill per shift per year, at least one drill per shift per year is performed on a “backshift” for each fire brigade, and fire brigade members including leaders shall participate in at least two drills per year. The inspectors identified multiple examples of the licensee's failure to meet these requirements in calendar years 2010 and 2011. This issue was entered into the licensee's corrective action program as Problem Evaluation Report (PER) 513378, 512736, and 527875. Inspection Report# : [2012002](#) (*pdf*)

**Significance:**  Mar 31, 2012

Identified By: NRC

Item Type: FIN Finding

**Failure to Follow Corrective Action Program Procedures**

The inspectors identified a finding for the licensee's failure to meet the requirements of corrective action program procedure NPG-SPP-03.1.7, PER Actions, Revision 2. Specifically, the licensee failed to ensure that the corrective action plan and associated actions addressed the required action and schedule associated with PER 432510, which documented the need to address a condition involving water accumulation in manhole locations containing electrical cable runs. This issue was entered into the licensee's corrective action program as Problem Evaluation Report (PER) 433761, 432510, and 505259. Inspection Report# : [2012002](#) (*pdf*)

**Significance:**  Mar 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Change to Fire Protection Program Which Adversely Affected Safe Shutdown Without Prior NRC Approval**

The inspectors identified a non-cited violation of Sequoyah operating license conditions 2.C. (16) and 2.C. (13) for Units 1 and 2 respectively, for a change made to the Sequoyah fire protection program which was determined to adversely affect safe shutdown (SSD), without prior NRC approval. Specifically, in lieu of protecting the cables and equipment to ensure that one train of equipment required for SSD was free of fire damage, the licensee made a change to the Sequoyah fire protection program in 2002 that added new operator manual actions (OMAs) to achieve SSD, without prior NRC approval. The evaluation performed in 2002 for the new OMAs was not adequate to support the conclusion that adding the OMAs did not adversely

affect post-fire SSD because the evaluation only addressed OMA feasibility and did not address defense-in-depth. The licensee entered this issue in the corrective action program as problem evaluation report 324757 to track resolution.  
Inspection Report# : [2012002](#) (*pdf*)

**Significance:**  Dec 31, 2011

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**Failure to Follow Procedure for Loss of Power Diesel Generator Start Instrumentation Surveillance Testing**

A self-revealing non-cited violation of Unit 2 Technical Specification (TS) 6.8.1.a was identified for the licensee's failure to follow station procedures during the performance of a surveillance testing activity. While performing degraded voltage/load shed relay testing associated with the 2B 6.9kV shutdown board, the use of improper test equipment and the incorrect connection of test equipment resulted in a control power circuit fuse being blown, which caused inoperability of an emergency diesel generator and a motor driven auxiliary feedwater train. This issue was entered into the licensee's corrective action program as Problem Evaluation Report (PER) 415324.

Inspection Report# : [2011005](#) (*pdf*)

**Significance:**  Dec 31, 2011

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**Nuclear Instrumentation System Channel Calibration Error**

A self-revealing non-cited violation of Unit 2 TS 3.0.3 was identified for the licensee's failure to place the unit in Mode 3 within seven hours when a Limiting Condition for Operation (LCO) was not met in Modes 1 and 2. The requirements of LCO 3.3.1, "Reactor Trip System Instrumentation," associated with the power range neutron flux function in Modes 1 and 2 were not met for a period of approximately 24 hours. This was the result of an error made during the performance of a channel calibration activity, which caused one channel to be left in an inoperable condition. This issue was entered into the licensee's corrective action program as PER 397142.

Inspection Report# : [2011005](#) (*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

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## Security

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

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## Miscellaneous

Last modified : November 30, 2012