

## Beaver Valley 1 2Q/2013 Plant Inspection Findings

---

### Initiating Events

**Significance:** G Apr 18, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO PERFORM A WRITTEN EVALUATION AS REQUIRED BY 50.59**

The inspectors identified a Severity Level (SL) IV NCV and associated Green finding of 10 CFR 50.59, “Changes, Tests and Experiments,” in that FENOC failed to perform a written evaluation for creation of an abnormal operating procedure (AOP) for response to a security threat. Specifically, FENOC created procedure 1/2OM-53C.4A.100.1 “Security Threat Procedure” to cooldown the reactor coolant system (RCS) in excess of the maximum cooldown rate prescribed in the updated final safety analysis report (UFSAR) and technical specifications (TS) without performing a written evaluation to provide the basis for the determination that a license amendment was not required. FENOC generated CR-2013-06122, 06382, and 07557. FENOC revised the abnormal operating procedure (AOP) to comply with TS as part of the immediate corrective actions.

The inspectors evaluated the performance deficiency using traditional enforcement because the performance deficiency had the potential to impact the regulatory process. This violation is associated with a finding that has been evaluated by the SDP and communicated with an SDP color reflected of the safety impact of FENOC’s deficient performance. The finding is more than minor because if left uncorrected, could have the potential to lead to a more significant safety concern. Specifically, if the procedure were implemented during a security event, FENOC would exceed cooldown rates assumed in the UFSAR accident analyses, potentially challenging the integrity of the RCS. In accordance with IMC 0609.04, “Initial Characterization of Findings,” and Exhibit 1 of IMC 0609, Appendix A, “The Significance Determination Process for Findings At-Power,” issued June 19, 2012, the inspectors determined that this finding is of very low safety significance (Green) because the performance deficiency represented a transient initiator that would not cause a reactor trip and loss of mitigation equipment relied upon to transition the plant from the onset of a trip to a stable shutdown condition. In accordance with Section 6.1.d.2 of the NRC Enforcement Policy, this violation is categorized as an SL IV because the resulting conditions were evaluated as having very low safety significance (Green) by the SDP. This finding has a cross-cutting aspect in the area of Human Performance, Work Practices because FENOC did not follow their 10 CFR 50.59 User Guidelines. Specifically, FENOC did not appropriately follow the regulatory applicability process, and as a result concluded that 50.59 was not applicable to implementation of 1/2OM-53C.4A.100.1. Although the performance deficiency occurred in 2005, the underlying cause of this performance deficiency is indicative of current performance because subsequent revisions of 1/2OM-53C.4A.100.1 and 100.2 (the most recent revision implemented on December 12, 2012) have not conducted written evaluations due to failure to appropriately follow the 10 CFR 50.59 User Guidelines causing the inaccurate conclusion that either 50.59 was not applicable or a written evaluation was not required [H.4(b)].

Inspection Report# : [2013003](#) (*pdf*)

---

### Mitigating Systems

**Significance:** G Sep 30, 2012

Identified By: Self-Revealing

Item Type: FIN Finding

### **REMEDIAL EXAMINATION FAILURE RATE EXCEEDS 10 PERCENT**

A self-revealing Green finding was identified when greater than 10 percent of reactor operators who failed the biennial written requalification examination subsequently failed the remediation examination. A performance deficiency existed since the re-examination failure rate exceeded guidance in NRC Inspection Procedure (IP) 71111.11B, Appendix F, which is an industry standard. The licensee has entered this issue into the corrective action program as CR 2012-11110.

This finding was more than minor because it was associated with human 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 and, if this finding were left uncorrected would have the potential to lead to a more significant safety concern. The finding was determined to be of low safety significance (Green) based upon guidance from Inspection Manual Chapter 0609, "Significance Determination Process," Appendix I, "Licensed Operator Requalification Significance Determination Process" because more than 10 percent of the licensed operators who were remediated failed their remediation examination.

The inspector determined that this finding had a cross-cutting aspect in the area of Human Performance, Resources, in that FENOC did not apply sufficient resources to properly remediate licensed operators who had failed their biennial written requalification examination [H.2.(b)].

Inspection Report# : [2012004](#) (*pdf*)

---

## **Barrier Integrity**

---

## **Emergency Preparedness**

---

## **Occupational Radiation Safety**

---

## **Public Radiation Safety**

---

## **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.

## Miscellaneous

Last modified : September 03, 2013