

## Comanche Peak 1 2Q/2013 Plant Inspection Findings

---

### Initiating Events

**Significance:**  Jun 26, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Follow Procedure Results in Water Hammer**

The inspectors identified a non-cited violation of Technical Specification 5.4.1.a for the failure to follow an auxiliary feedwater system operating procedure. As a result, a water hammer occurred on the condensate storage tank makeup reject line. The licensee entered the finding into the corrective action program as Condition Report CR-2012-012539.

The finding was more than minor because it was associated with the human performance attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective, in that, it increased the likelihood of those events that upset plant stability and challenge critical safety functions during power operations. Specifically, it resulted in a system water hammer. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process for Findings At-Power," the finding was determined to be of very low safety significance because the finding did not cause a reactor trip and the loss of mitigation equipment. The finding had a human performance cross-cutting aspect associated with resources, in that, the licensee failed to ensure that personnel were adequately trained to perform the activity. [H.2(b)]

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

**Significance:**  Mar 27, 2013

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Failure to Initiate a Condition Report for a Degraded Reactor Coolant Pump Motor Lower Oil Reservoir**

The inspectors reviewed a self-revealing non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, for the failure to follow procedures that require initiating a condition report for degradation of equipment. During a maintenance activity, the licensee discovered that the reactor coolant pump motor lower oil reservoir level was low and failed to enter the condition into the corrective action program. As a result, the cause of the degraded condition was not evaluated. The licensee entered the finding in the corrective action program as Condition Report CR-2012-011607.

The licensee's failure to initiate a condition report for a degraded reactor coolant pump motor lower oil reservoir was a performance deficiency. The finding was more than minor because it was associated with the equipment performance attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective. It increased the likelihood of those events that upset plant stability and challenge critical safety functions during power operations. Using NRC Manual Chapter 0609, Appendix A, "The Significance Determination Process for Findings At Power," the finding was determined to be of very low safety significance because the finding did not contribute to both the cause of a reactor trip and affect mitigation equipment. The finding had a problem identification and resolution cross-cutting aspect associated with the corrective action program, in that, the licensee did not ensure issues potentially impacting nuclear safety are fully evaluated. Specifically, the licensee did not trend and assess the issues associated with the leaking reactor coolant pump motor oil reservoir [P.1b].

Inspection Report# : [2013002](#) (*pdf*)

---

## Mitigating Systems

**Significance:**  Jun 26, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Inadequate Procedure for Testing Main Steam Safety Valves**

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the failure of the licensee to have documented instructions of a type appropriate to the circumstances for testing the main steam safety valves. Specifically, the procedure for testing the main steam safety valves did not provide direction to declare the valves inoperable when applying pressure to the lifting device. As a result, the licensee failed to declare the main steam safety valves inoperable during testing. The licensee entered the finding in the corrective action program as Condition Report CR-2013-002947.

The finding was more than minor because it was associated with the procedure quality attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the procedure did not provide guidance to declare a main steam safety valve inoperable with the test rig installed. Using Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process for Findings At-Power,” the finding was determined to be of very low safety significance because the finding was not a design or qualification deficiency; did not represent an actual loss of safety function of a system or train; and did not result in the loss of one or more trains of non-technical specification trains of equipment. The inspectors determined that the finding was not representative of current licensee performance and no cross-cutting aspect was assigned.

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

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Inadequate Calculations and Procedures for Offsite Power Availability**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” that states, in part, “applicable regulatory requirements and design basis are correctly translated into specifications, drawings, procedures, and instructions.” Specifically, prior to June 5, 2013, the licensee did not establish that the minimum switchyard voltages established in station procedures were adequate to prevent undesired actuation of the undervoltage protection scheme. This condition resulted from an inadequate analysis of undervoltage relay setpoints in design calculations, and the failure to provide acceptance criteria for undervoltage relay reset setpoints in relay calibration procedures. The finding was entered into the licensee’s corrective action program as Condition Report CR-2013-006176.

The inspectors determined that the failure to properly analyze minimum switchyard voltage requirements, and control relay setpoints necessary to maintain the availability of offsite power was a performance deficiency. The performance deficiency is more-than-minor because it was associated with Reactor Safety, Mitigating Systems Cornerstone, Design Control attribute 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, at the minimum switchyard voltages established in station procedures, actuation of the undervoltage protection scheme could have occurred and removed the reliable offsite power sources during an accident. Using Inspection Manual

Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the loss of operability or functionality. The finding had a cross-cutting aspect in the Area of Problem Identification and Resolution, associated with the Operating Experience Component, since the issues noted in this finding were discussed in Regulatory Issue Summary (RIS) 2011-12, “Adequacy of Station Electric Distribution System Voltages,” and RIS 2011-12 was reviewed by the licensee as part of the self assessment conducted in February 2013. [P.2(b)]

Inspection Report# : [2013007](#) (pdf)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate Voltage Calculations for the 125 VDC and 120 VAC Buses**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” that states, in part, “applicable regulatory requirements and design basis are correctly translated into specifications, drawings, procedures, and instructions.” Specifically, prior to June 20, 2013, the 125 VDC calculation did not take into account the maximum inrush currents and actual accident loading, and the 120 VAC calculation did not properly account for low voltage when the buses are supplied from their alternate source. The finding was entered into the licensee’s corrective action program as Condition Report CR-2013-006273 and CR-2013- 006396.

The inspectors determined that the failure to perform accurate voltage calculations for the 125 VDC system and 120 VAC bus was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Design Control attribute 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 125 VDC calculation did not take into account the maximum inrush currents and actual accident loading, and the 120 VAC calculation did not properly account for low voltage when the buses are supplied from their alternate source. Using Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the loss of operability or functionality. This finding did not have a cross-cutting aspect because the most significant contributor to the performance deficiency did not reflect current licensee performance.

Inspection Report# : [2013007](#) (pdf)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure To Establish 10 CFR 50.65(a)(1) Performance Goals for the APDG'S**

The inspectors identified a Green, non-cited violation of 10 CFR 50.65(a)(1), “Requirements for monitoring the effectiveness of maintenance at nuclear power plants,” that states, in part, that the licensee “shall monitor the performance or condition of structures, systems, or components, against licensee established goals, in a manner sufficient to provide reasonable assurance that these structures, systems, and components are capable of fulfilling their intended functions.” Specifically, on July 26, 2012, the licensee failed to establish goals and monitor the performance of the alternate power diesel generator system to ensure the system is capable of providing the necessary electric power onto the emergency buses. The finding was entered into the licensee’s corrective action program as Condition Report CR-2013-006521.

The inspectors determined that the failure to follow procedure to establish performance goals while performing Maintenance Rule (a)(1) monitoring to ensure the APDG system is capable and tested to meet the design basis requirements, was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Equipment Performance attribute and adversely affected the cornerstone objective to ensuring the availability and reliability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the procedure directs the licensee to establish performance goals on activities that address conditions which were determined to be classified as (a)(1). In accordance with Inspection Manual Chapter (IMC) 0609, Attachment 4, "Initial Characterization of Findings," the inspectors determined that the finding affected the Mitigating System Cornerstone. Using IMC 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the loss of operability or functionality. This finding had a cross-cutting aspect in the area of human performance associated with the resources component because the licensee failed to ensure that emergency equipment is adequate and available to assure nuclear safety. [H.2(d)]

Inspection Report# : [2013007](#) (*pdf*)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Analyze Effect of System Harmonics on Degraded Voltage Relays**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," that states, in part, "measures provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program." Specifically, prior to May 20, 2013, the licensee failed to assess the adverse effects of 6.9kV and 480V system harmonics on the degraded voltage relays. The finding was entered into the licensee's corrective action program as Condition Report CR-2013-006230.

The inspectors determined that the failure to analyze the effect of electrical system harmonics on the degraded voltage relays was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Design Control attribute 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, failure to analyze the effect of electrical system harmonics on the degraded voltage relays could cause the relays to fail to actuate at the setpoint specified in Technical Specifications. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was a deficiency affecting the design or qualification that did not result in the safety-related equipment losing operability or functionality. This finding did not have a cross-cutting aspect because the most significant contributor to the performance deficiency did not reflect current licensee performance.

Inspection Report# : [2013007](#) (*pdf*)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform Adequate Operability Assessments**

The inspectors identified a Green, non-cited violation, with three examples, of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," that states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions,

procedures, or drawings.” Specifically, for example 1 on February 28, 2013, for example 2 on June 5, 2013 and for example 3 on June 8, 2013, the licensee failed to follow procedure STI 442.01, “Operability Determination and Functionality Assessment Program,” Revision 1, Attachment 8.B page 3 of 5 which states, in part, “Identify the topics that are applicable to the quick technical evaluation and include information for applicable topics within the evaluation such as: for example 1, The effect or potential effect of the degraded or nonconforming condition on the affected SSC’s ability to perform its specified safety function, or for example 2, Compensatory Measures are recommended, or for example 3, Whether there is reasonable expectation of operability, including the basis for the determination.” The finding was entered into the licensee's corrective action program as Condition Report CR-2013-006599.

The inspectors determined that the failure to perform adequate operability assessments was a performance deficiency. The performance deficiency is more-than-minor because:

Example 1: It was associated with the Reactor Safety, Barrier Integrity Cornerstone, Configuration Control attribute and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers (containment) protect the public from radionuclide releases caused by accidents or events. Specifically, shutting off of the containment spray pumps during a large break LOCA inside containment would allow containment pressure to increase. Using Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” Exhibit 3, the inspectors determined the finding was of very low (Green) safety significance because it did not represent an actual open pathway in the physical integrity of reactor containment (valves, airlocks, etc.), containment isolation system (logic and instrumentation), and heat removal components or actual reduction in function of hydrogen igniters in the reactor containment.

Example 2: It was associated with the Reactor Safety, Mitigating Systems Cornerstone, Equipment Performance attribute 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 compensatory measures established in the first operability assessment did not ensure that offsite power would be maintained at minimum grid voltage.

Example 3: It was associated with the Reactor Safety, Mitigating Systems Cornerstone, Design Control attribute 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 operability assessment initially credited the use of the battery chargers after the emergency diesel generators restored power to the bus, without evaluating design basis for the battery chargers.

For examples 2 and 3, the inspectors used Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because these examples were a deficiency affecting the design or qualification that did not result in losing operability or functionality.

This finding had a cross-cutting aspect in the area of human performance associated with the decision making component because the licensee failed in all three examples to conduct an effectiveness review of a safety-significant decision to verify the validity of the underlying assumptions to identify possible unintended consequences during the original operability assessments. [H.1(b)]

Inspection Report# : [2013007](#) (*pdf*)

**Significance:** N/A Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Update the FSAR for the APDG's in Accordance with Regulatory Guide 1.70-1995**

The inspectors identified a Severity level IV, non-cited violation of 10 CFR 50.71(e)(4), requires the UFSAR be updated, at intervals not exceeding 24 months, and states in part, “the revisions must reflect all changes made in the facility or procedures described in the UFSAR.” Specifically, prior to June 20, 2013, the inspectors identified the alternate power diesel generator system was not described in sufficient detail in the FSAR as required. This finding was entered into the licensee’s corrective action program as Condition Report CR-2013-006256.

The inspectors determined that the failure to update the Final Safety Analysis Report to include the description of the APDG system in section 8.3.1 “AC Power Systems” was a performance deficiency. The issue is a performance deficiency because it was a failure to meet requirement, 10 CFR 50.71(e)(4), and it was within the licensee’s ability to correct the problem. Using Inspection Manual Chapter 0612, Appendix B, the performance deficiency was assessed through both the Reactor Oversight Process and traditional enforcement because the finding had the potential for impacting the NRC’s ability to perform its regulatory function. The finding resulted in a minor performance deficiency. For traditional enforcement, the inspectors used the Enforcement Policy, in accordance with Section 6.1.d.3, and determined the violation to be a Severity Level IV, non cited violation, because the licensee failed to update the UFSAR as required by 10 CFR 50.71(e)(4), but the lack of up to date information had not resulted in any unacceptable change to the facility or procedures. This violation did not have a cross-cutting aspect.

Inspection Report# : [2013007](#) (*pdf*)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Provide Appropriate Acceptance Criteria and Testing Procedure Instructions**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," that states, in part, “A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.” Specifically, since 2001, the licensee failed to provide appropriate acceptance criteria and testing procedure instructions during modified performance tests involving Class 1E batteries for the 1-minute critical period testing data which incorporated the requirements of IEEE Standard 450-1995 to ensure the battery would meet the required design voltage for the duty cycle. The finding was entered into the licensee’s corrective action program as Condition Report CR-2013-005673.

The inspectors determined that the failure to provide appropriate acceptance criteria and testing procedure instructions involving Class 1E batteries for the 1-minute critical period testing data during modified performance tests was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Procedure Quality attribute 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, Procedure MSE-S0-5715 does not direct the technicians to record and evaluate the voltage at the end of the 1-minute critical period to ensure it does not drop below the designed minimum voltage, which would indicate the battery would not be capable of meeting the required design function. Using Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the loss of operability or functionality. This finding did not have a cross-cutting aspect because Calculation EE-CA-0000-5121 was implemented in 2001 and did not reflect current licensee performance.

Inspection Report# : [2013007](#) (*pdf*)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Provide Appropriate Acceptance Criteria for the Safety Chill Water Pumps**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," that states, in part, "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents." Specifically, since 1994, the licensee failed to recognize that if the safety-related chilled water pumps were degraded to 90 percent of their reference value, as permitted by IST Procedures OPT 209A/B, the system may not be able to achieve the required design flowrates as stated in Calculation 1-EB-311-8. This finding was entered into the licensee's corrective action program as Condition Report CR-2013-006252.

The inspectors determined that the failure to ensure appropriate acceptance criteria were incorporated into test procedures for the safety chill water pumps was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Design Control attribute 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 licensee failed to recognize that if the safety-related chilled water pumps were degraded to 90 percent of their reference value, as permitted by IST Procedures OPT-209A/B, the system may not be able to achieve the required design flowrates as stated in Calculation 1-EB-311-8. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the loss of operability or functionality. This finding did not have a cross-cutting aspect because Calculation 1-EB-311-8 was updated in 1994 to incorporate the uninterruptible power system fan coil units and did not reflect current licensee performance.

Inspection Report# : [2013007](#) (pdf)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Identify Fouling on the Emergency Diesel Generator Building Exhaust Ventilation Screens**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," that states, in part, "measures shall be established to assure that conditions adverse to quality are promptly identified and corrected." Specifically, prior to June 17, 2013, the licensee failed to establish an activity to identify fouling of the Unit 1 emergency diesel generator building exhaust ventilation screens. The finding was entered into the licensee's corrective action program as Condition Report CR-2013-006540.

The inspectors determined that the failure to identify fouling on the Unit 1 emergency diesel generator building exhaust ventilation screens was a performance deficiency. The performance deficiency is more-than-minor because it had the potential to lead to a more significant safety concern. Specifically, the Unit 1 emergency diesel generator rooms could have insufficient exhaust flow to meet design basis temperature requirements if left uncorrected. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the emergency diesel generators losing operability or functionality. This finding did not have a crosscutting aspect because the most significant contributor to the performance deficiency did not reflect current licensee performance.

Inspection Report# : [2013007](#) (pdf)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Incorporate the Refueling Water Storage Tank Vortexing Design Calculation Into the Emergency Operating Procedures for Containment Spray Pump Operation**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," states, in part, "measures shall be established to assure that the design basis for systems, structures, and components are correctly translated into specifications, drawings, procedures and instructions." Specifically, since 2006 and 2007, the licensee failed to appropriately incorporate the RWST vortexing design calculation's 6 percent indicated level into the emergency operating procedures for switching containment spray pump suction from the RWST to the containment sump to prevent damage to the pumps. The finding was entered into the licensee's corrective action program as Condition Report CR-2013-005739.

The inspectors determined that the failure to appropriately incorporate the RWST vortexing design calculation's 6 percent indicated level into the emergency operating procedures for switching containment spray pump suction from the RWST to the containment sump to prevent damage to the pumps was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Procedure Quality attribute 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, Emergency Operating Procedure EOS 1.3A/B allowed the operators the ability to delay transfer of containment spray pump suction source which could have caused damage to the pumps due to vortexing. Using Inspection Manual Chapter 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance because the finding was not a design deficiency and did not result in the loss of operability or functionality. This finding did not have a cross-cutting aspect because the change to the procedure due to the addition of the sump strainers occurred in 2006 and 2007, and did not reflect current licensee performance.

Inspection Report# : [2013007](#) (*pdf*)

**Significance:**  Jun 20, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Correct Design Calculations to Incorporate Technical Specification Allowed Frequency Range for the Emergency Diesel Generator in a Timely Manner**

The inspectors identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states, in part, "measures shall be established to assure that conditions adverse to quality are promptly identified and corrected." Specifically, since May 2010, the licensee failed to correct a condition adverse to quality in a timely manner that involved updating design basis calculations for safety-related equipment to include the allowed technical specification frequency range of  $\pm 2$  percent for the emergency diesel generators. The finding was entered into the licensee's corrective action program as Condition Report CR-2013-006604.

The inspectors determined that the failure to correct a condition adverse to quality in a timely manner that involved updating design basis calculations for safety-related equipment to include the allowed technical specification frequency range of  $\pm 2$  percent for the emergency diesel generators was a performance deficiency. The performance deficiency is more-than-minor because it was associated with the Reactor Safety, Mitigating Systems Cornerstone, Design Control attribute and adversely affected the cornerstone objective to ensure availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the calculations to support safety-related equipment did not include allowed technical specification frequency range for the emergency diesel generators to ensure the equipment would be capable of performing their safety-related functions. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," Exhibit 2, the inspectors determined the finding was of very low (Green) safety significance

because the finding was a deficiency affecting the design or qualification that did not result in the safety-related equipment losing operability or functionality. This finding had a cross-cutting aspect in the area of problem identification and resolution associated with the corrective action program component because the licensee failed to take appropriate corrective actions to address updating design basis calculations to include technical specification allowed emergency diesel generator frequency range in a timely manner, commensurate with their safety significance. [P.1(d)]

Inspection Report# : [2013007](#) (pdf)

**Significance:**  Mar 27, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Have Instructions When Performing Activities**

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, for the failure to accomplish an activity affecting quality as prescribed by documented instructions. Specifically, radiation protection personnel installed cameras inside containment and did not have a work order to accomplish the activity because the work order had not been completed and approved. The licensee entered the finding in the corrective action program as Condition Report CR-2013-001723.

The licensee's failure to have documented instructions for installing cameras inside containment was a performance deficiency. The finding was more than minor because if left uncorrected it would have the potential to lead to a more significant safety concern, in that, not using instructions could cause a more significant event and cause the inoperability of safety-related equipment. Using NRC Manual Chapter 0609, Appendix A, "The Significance Determination Process for Findings At Power," the finding was determined to be of very low safety significance because the finding was not a design or qualification deficiency; did not represent an actual loss of safety function of a system or train; and did not result in the loss of one or more trains of non-technical specification trains of equipment. The finding had a human performance cross-cutting aspect associated with work practices, in that, the licensee did not effectively communicate the expectations regarding the use of the work order when installing cameras inside containment [H.4b].

Inspection Report# : [2013002](#) (pdf)

**Significance:**  Sep 25, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate Compensatory Measures for Inoperable Hose Stations**

The inspectors identified a non-cited violation of Technical Specification 5.4.1.d for the failure of the licensee to place signs at inoperable fire hose stations and at the compensatory fire hoses identifying the purpose and location of the compensatory measures. The inspectors determined that the licensee's compensatory actions were complex, undocumented, and not communicated to the fire brigade leader. As a result, the compensatory actions for inoperable hose stations were inadequate. The licensee entered the finding into the corrective action program as Condition Report CR-2012-006524.

The licensee's failure to place signs at the inoperable fire hose stations and at the compensatory fire hoses identifying the purpose and location of the compensatory measures was a performance deficiency. The finding was more than minor because it was associated with the protection against external factors attribute of the mitigating systems cornerstone and adversely affected the cornerstone objective to ensure the availability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the fire protection compensatory actions for inoperable hose stations were inadequate. Using NRC Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 4, Appendix A, Exhibit 2, d.3.c, the finding was referred to NRC Inspection Manual Chapter

0609, Appendix M, “Significance Determination Process Using Qualitative Criteria.” A senior reactor analyst evaluated the finding and determined qualitatively that the resultant increase in risk would be of very low safety significance. The finding has a human performance cross-cutting aspect associated with decision-making because the licensee failed to communicate decisions to personnel who have a need to know the information in order to perform work safely [H.1c].

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

**Significance:**  Sep 25, 2012

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **Inadequate Gasket Installation Causes Diesel Jacket Water Leak**

The inspectors reviewed a self-revealing non-cited violation of Technical Specification 5.4.1.a for the failure of the licensee to adequately install a gasket in accordance with procedure. As a result, the diesel generator jacket water connection leaked above the Final Safety Analysis Report allowable value for a seven day technical specification mission time for the diesel generator. The licensee replaced the leaking gasket and entered the finding into the corrective action program as Condition Report CR-2012-006536.

The licensee’s failure to adequately install a gasket in accordance with procedure was a performance deficiency which resulted in a diesel generator jacket water leak. The finding was more than minor because it was associated with the human performance attribute of the mitigating systems cornerstone and adversely affected the cornerstone objective to ensure the reliability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the jacket water leakage rate exceeded the Final Safety Analysis Report allowable value for a seven day diesel generator technical specification mission time. Using NRC Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” the finding screened to a detailed risk evaluation because it represented an actual loss of function of a single train for greater than its technical specification allowed outage time. A senior reactor analyst determined that the risk significance was of very low safety significance because the diesel generator was always capable of functioning for greater than the probabilistic risk assessment mission time of 24 hours. The finding has a human performance cross-cutting aspect associated with resources because the licensee failed to maintain design margins and minimize long-standing equipment issues [H.2a].

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

## **Barrier Integrity**

**Significance:**  Sep 25, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Promptly Correct a Nonconservative Technical Specification**

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, for failure to promptly correct a nonconservative technical specification, a condition adverse to quality. Specifically, in December 2010, the licensee implemented the administrative controls of NRC Administrative Letter 98-10, “Dispositioning of Technical Specifications that are Insufficient to Ensure Plant Safety,” to permit storage of uprated fuel assemblies in Region II of the spent fuel pools. The licensee determined Technical Specification 3.7.17, “Spent Fuel Assembly Storage,” was nonconservative for this condition, and did not submit a license amendment request in a timely manner to correct the technical specification. The licensee entered the finding into the corrective action program as Condition Report CR-2012-010304.

The licensee's failure to promptly correct a condition adverse to quality was a performance deficiency. This performance deficiency was more than minor because it was associated with the spent fuel pool controls attribute of the barrier integrity cornerstone. Because the significance determination process does not directly address spent fuel pool criticality, a senior reactor analyst evaluated this issue using NRC Inspection Manual Chapter 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria." Based on calculations provided by the licensee, the analyst determined that even with all uncertainties included in the calculations, the spent fuel pools would remain subcritical under all conditions, including a complete dilution of the borated water. The analyst qualitatively considered a completed dilution of the spent fuel pools to be a very low probability event. Therefore, the analyst concluded that this issue was of very low safety significance. This finding has a human performance cross-cutting aspect associated with work practices because licensee management did not provide adequate oversight to support nuclear safety by ensuring a timely submittal of a technical specification amendment following implementation of administrative controls [H.4c].

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

---

## 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