

## Palo Verde 3

# 1Q/2014 Plant Inspection Findings

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## Initiating Events

**Significance:** G Sep 30, 2013

Identified By: NRC

Item Type: FIN Finding

### **Failure to Include Requirements in Preventative Maintenance Basis**

The inspectors identified a Green finding for the failure of licensee personnel to follow Procedure 30DP-9MP08, "Preventive Maintenance Program." Specifically, plant personnel did not ensure that requirements for performing inspection and replacement of degraded tie-wraps in electrical cubicles were contained in preventative maintenance basis documents. Consequently, degraded cable tie-wraps in Unit 1 load center L02 were not inspected prior to a catastrophic electrical fault on July 2, 2013. The licensee rebuilt the load center cubicle and has entered this issue into their corrective action program as PVAR 4454845.

The failure to follow established procedures for updating preventive maintenance basis documents with requirements and recommendations from previous component failures was a performance deficiency. This performance deficiency is more than minor because it was associated with the procedure quality attribute of the Initiating Events Cornerstone and adversely affects the cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, by not including the requirements and recommendations from the history of previous failures in the preventative maintenance basis, pertinent operating experience was not considered when evaluating changes to the preventative maintenance program. Consequently, degraded cable tie-wraps in Unit 1 load center L02 were not inspected prior to experiencing a catastrophic electrical fault on July 2, 2013 that upset plant stability. The inspectors used the NRC Inspection Manual Chapter 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," to determine the significance. The inspectors determined that the finding was of very low safety significance (Green) because it did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions would not be available. The inspectors also determined the issue had a cross-cutting aspect in the area problem identification and resolution associated with the operating experience component because the licensee did not implement and institutionalize operating experience through changes to the station's preventative maintenance program [P.2(b)].

Inspection Report# : [2013004](#) (*pdf*)

**Significance:** G Jun 30, 2013

Identified By: Self-Revealing

Item Type: FIN Finding

### **Failure to Implement Corrective Action for Embedded Operator Work Around**

A self-revealing finding occurred because the licensee did not take action to correct an embedded operator work around in the condensate system. Specifically, the licensee did not evaluate and develop a plan to correct the practice of throttling the condensate polishing demineralizer bypass valve in manual control mode rather than automatic mode. As a result, a malfunction of the heater drain tank B level controller resulted in a feedwater pump B trip and a subsequent reactor power cutback. The licensee entered the issue into their corrective action program as PVAR 4330504 and revised operating procedures to allow the condensate polishing demineralizer bypass valve controller to operate in automatic control mode during full power operations.

The failure to evaluate and determine corrective actions in accordance with established corrective action program procedures is a performance deficiency. This performance deficiency is more than minor, and therefore a finding, because it was associated with the configuration control attribute of the Initiating Events Cornerstone and adversely affected the cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, the practice of throttling the condensate polishing demineralizer bypass valve in manual control mode rather than automatic mode resulted in a reactor power cutback that upset plant stability. The inspectors used the NRC Inspection Manual Chapter 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," and IMC 0609, Appendix A, "The Significance Determination (SDP) for Findings At-Power" to determine the significance. The inspectors determined that the finding was of very low safety significance (Green) because it only contributed to the likelihood of a reactor trip and not the likelihood that mitigation equipment or functions would not be available. This issue did not have a cross-cutting aspect associated with it because it is not indicative of current performance.

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

## Mitigating Systems

**Significance:**  Mar 28, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure To Provide Adequate Technical Justification For Operability of Containment Spray and Diesel Fuel Oil Systems**

The inspectors identified multiple examples of a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure of operations personnel to follow station procedures used to perform operability determinations. Specifically, operations personnel failed to provide sufficient technical justification for the reasonable assurance of operability of a degraded condition involving one train of containment spray system and nonconforming conditions associated with diesel fuel oil piping.

The inspectors concluded the failure of operations personnel to follow station procedures to perform operability determinations was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because it adversely affected the equipment performance attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at-Power." The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a consistent process cross-cutting aspect in the area of human performance because the licensee did not use a consistent and systematic process to make decisions (H.13).

Inspection Report# : [2014007](#) (pdf)

**Significance:**  Mar 28, 2014

Identified By: NRC

Item Type: FIN Finding

### **Failure to Follow Station Process for Root Cause Evaluation**

The inspectors identified a Green finding for the failure of station personnel to follow procedures to implement root cause evaluations. Specifically, approximately one third of the root cause evaluations reviewed by inspectors resulted in a probable cause with further information needed to validate the cause. Of this subset, eighty percent of the evaluations did not adhere to station processes.

The failure of station personnel to follow station procedures to implement root cause evaluations was a performance deficiency. The performance deficiency was more than minor, therefore a finding, because if left uncorrected the performance deficiency could become a more significant safety concern in that significant conditions adverse to quality could reoccur prior to the implementation of appropriate corrective action. The finding is associated with multiple cornerstones, though it is most closely associated with the Mitigating Systems Cornerstone and the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at-Power." The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a consistent process cross-cutting aspect in the area of human performance because the licensee did not use a consistent and systematic approach when making decisions (H.13).

Inspection Report# : [2014007](#) (*pdf*)

**Significance:** G Dec 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate Modification of Safety Related Accumulators**

The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," for the failure to assure that a modification to the main steam and main feedwater isolation valve accumulators was suitable for the reliable operation of these components. Specifically, on September 4, 2009, the licensee failed to assess the suitability of a small dead band for a thermal relief valve in the accumulator valve manifold assembly and the impact on reliable operation of the associated valves. The licensee entered this issue into the corrective action program as Palo Verde Action Request 4429273. The licensee isolated the thermal relief valve from the actuators.

The failure to assure that the modification of the main steam and main feedwater isolation valve accumulators was suitable for the reliable operation of these components was a performance deficiency. The performance deficiency is more than minor, and therefore is a finding, because it was associated with the Mitigating Systems Cornerstone attribute of equipment performance and adversely affects the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and 0609 Appendix A, "The Significance Determination Process (SDP) for Findings at-Power." The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance associated with resources component because the licensee did not maintain design margins by minimizing long standing equipment issues.

Inspection Report# : [2013005](#) (*pdf*)

## Barrier Integrity

**Significance:**  Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Follow Operability Determination Procedure for Maintaining Administrative Limits**

The inspectors identified a Green noncited violation of 10 CFR Part 50 Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure of operations and engineering personnel to follow station procedures to perform operability determinations and functional assessments. Specifically, plant personnel did not maintain appropriate controls to ensure that the temperature limit established in the operability determination for the spent fuel pool criticality analysis was maintained. The licensee entered the issue into their corrective action program as PVAR 4380424, began taking more frequent readings of spent fuel pool temperature indicators, and lowered the spent fuel pool temperature alarm setpoint.

The failure to follow Procedure 40DP-9OP26 for performing operability determinations is a performance deficiency. This performance deficiency is more than minor, and therefore a finding, because it is associated with the Barrier Integrity Cornerstone attribute of procedure quality and it adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accident or events. The inspectors evaluated the significance of the finding using Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and IMC 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors reviewed all Barrier Integrity screening questions in IMC 0609, Appendix A, Exhibit 3 Section D, and all questions were answered "No." Therefore, the finding was determined to be of very low safety significance. The inspectors determined that the finding has a cross-cutting aspect in the area of human performance associated with decision making. Specifically, the licensee did not communicate the administrative limits established in the spent fuel pool criticality operability determination to appropriate operations personnel [H.1(c)].  
Inspection Report# : [2013003](#) (*pdf*)

## Emergency Preparedness

**Significance:**  Sep 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Maintain an effective Emergency Plan for a Seismic Event**

The inspectors identified a non-cited violation of 10 CFR 50.54 (q)(2) for the failure to maintain an effective emergency plan action level scheme in accordance with 50.47(b)(4). Specifically, the Alert threshold for HA1.1, "Natural or Destructive Phenomena Affecting VITAL AREAS," requires a declaration of an Alert for a seismic event greater than operating basis earthquake as indicated by any force balance accelerometer reading greater than 0.10g. Operators rely on alarms to verify the acceleration beyond the operating basis earthquake and the inspectors determined the seismic monitor alarm set point was 0.13g. This could result with the inability of operations personnel to classify an event at the Alert level. A design change modified the seismic monitoring set point to 0.1g and restored compliance. The licensee entered the issue into their corrective action program as Palo Verde Action Request 3624077.

The inspectors determined that the failure to maintain an effective emergency action level scheme was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because it adversely affected the Emergency Response Organization Performance attribute of the Emergency Preparedness Cornerstone and its objective to ensure that the licensee is capable of implementing adequate measures to protect the health and safety of

the public in the event of a radiological emergency. Specifically, the licensee's ability to declare an Alert based on Natural Phenomenon at the correct threshold was degraded. The inspectors assessed the significance of the finding in accordance with NRC Inspection Manual Chapter (IMC) 0609, Appendix B, "Emergency Preparedness Significance Determination Process," Figure 5.4-1, and determined the finding to be of very low safety significance because compensatory measures were available for emergency response organization personnel to perform the classification duties. The inspectors determined this finding is not indicative of current performance and therefore no cross-cutting aspect is assigned.

Inspection Report# : [2013004](#) (*pdf*)

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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

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