

## Sequoyah 2

### 1Q/2015 Plant Inspection Findings

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## Initiating Events

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## Mitigating Systems

**Significance:**  Jun 30, 2014

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to perform visual examination of the Unit 1 and Unit 2 CRDM seismic plate supports**

An NRC-identified Green non-cited violation (NCV) of 10 CFR 50.55a(g)(4), “Inservice Inspection Requirements” was identified for the licensee’s failure to perform visual examinations of the control rod drive mechanism (CRDM), American Society of Mechanical Engineers (ASME) Class 1, seismic plate supports as required by the ASME Code, Section XI. The licensee entered this issue into their corrective action program (CAP) as Problem Evaluation Report (PER) 889400. The licensee developed an operability evaluation and concluded that the supports remained functional. The licensee also initiated corrective actions to perform the required visual examinations of the CRDM seismic plate supports before the end of the current inservice inspection (ISI) interval in April 2016.

The finding was more than minor because it was associated with the protection against external factors attribute of the mitigating systems cornerstone, and affected the cornerstone objective to ensure availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequence. The inspectors screened this finding as Green because the finding did not involve the loss or degradation of equipment or function specifically designed to mitigate a seismic initiating event. A crosscutting aspect was not assigned to this finding in accordance with IMC 0612, Appendix B, because the exclusion of the CRDM seismic plate supports from the scope of the ISI Program occurred outside of the nominal 3-year period for present performance, and therefore it was not reflective of present licensee performance. (Section 1R08)

Inspection Report# : [2014003](#) (*pdf*)

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## Barrier Integrity

**Significance:**  Sep 30, 2014

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

### **Failure to Perform Adequate Maintenance on Containment Vacuum Relief Valve (Section 1R12)**

A Self-revealing Green Non-Cited Violation (NCV) of Technical Specification (TS) 6.8.1.a. was identified for the licensee’s failure to adequately implement a maintenance procedure associated with a vacuum relief containment isolation valve. Specifically, during a refueling outage on May 24, 2014, the licensee failed to properly install a locking wire associated with the spring tension bolts on the Unit 2 containment vacuum relief valve. This error

ultimately led to a failure of the valve on June 24 at 1600 and entry into TS 3.6.3, “Containment Isolation Valves.” The valve was ultimately repaired and the valve was declared operable on June 26 at 0026. The inspectors determined that the licensee’s failure to adequately develop and implement a procedure governing the maintenance of a containment isolation valve was a performance deficiency.

This finding was determined to be greater than minor because it was associated with the Configuration Control attribute of Barrier Integrity cornerstone and adversely affected the cornerstone’s objective to ensure the structural integrity of the containment boundary. Specifically, the finding challenged containment integrity. A screening analysis was conducted using the assumption that all core damage sequences would lead to a Large Early Release. This was an overestimation of risk, since actions to mitigate a release were possible. The short exposure time multiplied by the Core Damage Frequency for the plant resulted in less than a 1E-7 increase in Large Early Release Probability, and the finding is Green. The cause of this finding was determined to have a cross-cutting aspect in the Human Performance component, relating to the assurance by supervision that procedures are adequate to ensure nuclear safety. [H.1]. (Section 1R12)

Inspection Report# : [2014004](#) (pdf)

## Emergency Preparedness

## Occupational Radiation Safety

**Significance:**  Jun 30, 2014

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to comply with entry requirements to a HRA**

The inspectors identified a Green, self-revealing, NCV of Technical Specification (TS) 6.12.1, “High Radiation Area”, for two examples where workers made entries into High Radiation Areas (HRA) on May 16, 2014, without meeting the entry requirements specified therein. Specifically, these workers, while performing decontamination activities and moving materials in the upper reactor containment, entered a posted HRA: 1) without knowledge of the current radiological conditions in the actual work area, 2) not using a radiological work permit (RWP) approved for HRA entry, and 3) without wearing the prescribed electronic dosimetry for an HRA. The licensee entered these events into the Corrective Action Program (CAP) as Problem Evaluation Reports (PERs) Numbers 886668 and 886160. Immediate corrective actions included restricting worker access to the Radiologically Controlled Area (RCA) and issuance of communications to the site and within the Radiation Protection organization to reinforce roles in RWP adherence and access control.

This finding was more than minor because it is associated with the Occupational Radiation Safety Cornerstone attribute of Human Performance and adversely affects the cornerstone objective of ensuring adequate protection of worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. The finding was not related to As Low As Reasonably Achievable planning, nor did it involve an overexposure or substantial potential for overexposure and the ability to assess dose was not compromised. Therefore, the finding was determined to be of very low safety significance (Green). This finding involved the cross-cutting aspect of Human Performance, Avoid Complacency [H.12] because workers failed to apply appropriate error reduction tools during participation in the pre-job brief and prior to crossing the HRA boundaries. (2RS1)

Inspection Report# : [2014003](#) (pdf)

## 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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