

## Dresden 3

# 1Q/2016 Plant Inspection Findings

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## Initiating Events

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## Mitigating Systems

**Significance:** G Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to Evaluate the Available Net Positive Suction Head for the Diesel Generator Cooling Water Pumps Following a Dam Failure**

The inspectors identified a finding of very low safety significance, and an associated NCV of Title 10, Code of Federal Regulations (CFR), Part 50, Appendix B, Criterion III, "Design Control," for the failure to verify the adequacy of the diesel generator cooling water (DGCW) pumps' design. Specifically, the licensee failed to evaluate the net positive suction head (NPSH) available to the DGCW pumps at the most limiting ultimate heat sink (UHS) level after a postulated dam failure where they are expected to perform a safety function. The licensee entered this finding into their Corrective Action Program (CAP) and, after a review of their DGCW pump NPSH calculation and an evaluation, concluded that the DGCW pumps had adequate NPSH available to them at the most limiting UHS level after a postulated dam failure, and therefore remained operable.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating Systems cornerstone attribute of equipment performance, and adversely affected the associated cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding screened as very low safety significance (Green) because although it affected the design or qualification of the DGCW pumps, it did not result in the loss of operability or functionality of the pumps. The inspectors did not identify a cross-cutting aspect associated with this finding because it was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2015003](#) (*pdf*)

**Significance:** G Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **Failure to Perform Ultimate Heat Sink Surveys in Accordance With Quality Assurance Program**

The inspectors identified a finding of very low safety significance, and an associated NCV of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," for the failure to perform surveys of the UHS in accordance with the Quality Assurance Program. Specifically, the licensee failed to ensure that: (1) the requirements and acceptance limits in the Updated Final Safety Analysis Report (UFSAR) and other applicable design documents for the high points of the intake and discharge canals were incorporated into the UHS test; (2) the evaluation of the bathymetric survey results accounted for the instrument uncertainty of the test equipment; and (3) the UHS

bathymetric survey results were evaluated in accordance with the Quality Assurance Program to assure that the UFSAR required UHS volume was satisfied. The licensee entered this finding into their CAP and, after a review of

past bathymetric surveys and other information, determined that: (1) the discharge canal high point had not degraded and was not expected to significantly degrade; and (2) the UHS remained operable because the available UHS water volume still remained above the UFSAR required volume.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating Systems cornerstone attribute of procedure quality, and adversely affected the associated cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding screened as very low safety significance (Green) because although it affected the design or qualification of the UHS, it did not result in the loss of operability or functionality of the UHS. The inspectors determined this finding had an associated cross-cutting aspect in the area of Human Performance, Design Margins, because the licensee did not pay special attention to maintaining the safety-related UHS. Specifically, special attention was not placed on guarding the design margin of the UHS, and a test program that did not meet all the quality assurance requirements was accepted to demonstrate the adequacy of the UHS.

Inspection Report# : [2015003](#) (*pdf*)

**Significance:**  Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Failure to Post Protected Pathway Signs**

The inspectors identified a finding of very low safety significance, and an associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the licensee's failure to implement all necessary prescribed risk management actions as required by licensee procedure OP-AA-108-117, "Protected Equipment Program," during a Unit 3 low pressure coolant injection (LPCI) logic system functional test (LSFT) maintenance window. Specifically, the licensee failed to post protected equipment signs for the Unit 3 2203-28 instrument rack whose unavailability impacts the high pressure coolant injection (HPCI) system and would have taken the unit into a licensee-defined Orange risk condition and Technical Specification (TS) Limiting Condition for Operations (LCO) 3.0.3.

The performance deficiency was determined to be more than minor because the licensee failed to implement prescribed risk management actions which if left uncorrected could have become a more significant safety concern. Specifically, operators inadvertently removed the protected equipment postings on instrument rack 2203-28 which could have significantly degraded the key safety function of reactor coolant inventory control if both the HPCI and LPCI systems became unavailable simultaneously and were required to mitigate the consequences of an accident that could result in potential offsite exposure comparable to the 10 CFR Part 100 guidelines. The finding screened as very low safety significance (Green) because the inspectors answered "No" to all of the Mitigating Systems Screening Questions. The inspectors determined this finding had a cross-cutting aspect in the area of Human Performance, Work Management, because the licensee failed to implement risk management actions in accordance with procedure OP-AA-108-117. Specifically, the licensee inappropriately removed protected equipment postings prior to commencing maintenance activities which required the risk management activity to be in place.

Inspection Report# : [2015003](#) (*pdf*)

**Significance:**  Jun 30, 2015

Identified By: Self-Revealing

Item Type: FIN Finding

#### **Failure to Meet Technical Specification Surveillance Requirements Due to Foreign Material Left in the Unit 2 EDG Starting Circuit (1R13)**

A finding of very-low safety significance (Green) was self-revealed on April 21, 2015 while performing TS Surveillance DOS 6600-12, "Diesel Generator Tests: Endurance and Margin/Full Load Rejection/ECCS [Emergency Core Cooling System]/Hot Restart," in support of Surveillance Requirement

3.8.1.16 which requires the EDG to achieve rated frequency and voltage conditions within 13 seconds when started less than or equal to five minutes from a previously loaded run, the Unit 2 Emergency Diesel Generator (EDG) failed to complete a hot restart. Licensee troubleshooting identified a degraded pressure switch associated with main bearing lube oil pressure in the start circuit which was taking several minutes to return to a low-pressure condition upon shutting down the EDG. This resulted in a failure of the start circuit relay to be energized upon initiating a start of the EDG, until the pressure switch returned to its appropriate low-pressure state. An internal investigation of the pressure switch identified strips of Teflon tape in the bellows of the pressure switch, which resulted in the pressure switch's sluggish response to lowering lube oil pressure, and a failure to meet the TS hot restart criteria.

The inspectors determined that the failure to implement Procedure MA-AA-716-008, "Foreign Material Exclusion Program," and therefore the inability to perform TS Surveillance Requirement 3.8.1.16 was a performance deficiency, and was considered more than minor because it was associated with the equipment performance attribute of the Mitigating Systems cornerstone, and impacted the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors utilized Attachment 0609.04, "Initial Characterization of Findings," and determined that this issue was of very-low safety significance because each question provided in Inspection Manual Chapter (IMC) 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," was answered "No." The inspectors concluded that this finding was cross-cutting in the Human Performance, Documentation area, because licensee procedure MA-AA-716-008, "Foreign Material Exclusion Program," work instructions associated with Work Order 01410972-01, and previous calibrations of pressure switch 2-6641-526 did not include specific instructions and warnings regarding the proper use of Teflon tape with regards to preventing it from becoming foreign material. Other Dresden maintenance procedures, specifically MA-DR-0300-001, "Preventive Maintenance of Hydraulic Control Unit," and DEP 0300-16, "Rebuilding the Unit 2 (3) ASCO Scram Solenoid Pilot Valves," have specific warnings regarding the proper use and potential for Teflon tape to become foreign material. [H.7]  
Inspection Report# : [2015002](#) (pdf)

**Significance:**  May 29, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Procedure Revisions Resulted in Isolation Condenser Unable to Meet Design Basis**

The inspectors identified a finding of very-low safety significance, and an associated Non-Cited Violation (NCV) of Title 10, Code of Federal Regulations (CFR), Part 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to ensure that applicable regulatory requirements and the isolation condenser's (IC's) design bases were correctly translated into procedures. Specifically, the licensee added steps to the IC control procedures which directed operators to secure the IC in order to prevent the water level in the shell from going below 3.5 feet. The added steps would result in the IC being shutdown when required to operate per the IC's design bases. The licensee entered the issue into their Corrective Action Program (CAP) as Action Request 02506445, "NRC MOD/5059 Inspection: ISCO [Isolation Condenser] Operating Procedures," dated May 28, 2015.

The performance deficiency was determined to be more than minor because the finding was associated with the Mitigating Systems cornerstone attribute of Procedure Quality, and affected the cornerstone's objective of ensuring the capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the inadequate procedures would drive the operators to stop the IC during a design bases event and prevent the IC from performing its design function of removing decay heat from the reactor. The finding has a cross-cutting aspect in the area of Human Performance; Teamwork, because the licensee did not communicate and coordinate activities within and across organizational boundaries to ensure nuclear safety is maintained. Specifically, the Operations Department failed to communicate and coordinate with the Engineering Department when developing the procedural changes. [H.4]

Inspection Report# : [2015007](#) (pdf)

**Significance:**  May 29, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

### **EDG Usable Fuel Calculations Failed to Consider Appropriate EDG Frequency Variations**

The inspectors identified a finding of very-low safety significance, and an associated NCV of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” for the failure to account for increased fuel oil consumption during the development of the Emergency Diesel Generator (EDG) Calculation 10553 CALC 07, “Dresden Station Emergency Diesel Generators Endurance Calculations,” Revision 2, which resulted in non-conservative Technical Specifications (TS). Specifically, the licensee failed to account for the increased fuel oil consumption at an EDG frequency of 61.2 Hertz (Hz), and ensure that the minimum fuel oil level in the EDG day tanks, as required per TS 3.8.1.4, was adequate to support the EDGs’ mission time at 110 percent for one hour. The licensee entered the issue into their CAP as Action Request 02506869, “NRC MOD/5059 Inspection: Emergency Diesel Generator Fuel Consumption,” dated May 28, 2015.

The performance deficiency was determined to be more than minor because the finding was associated with the Mitigating Systems cornerstone attribute of design control and affected the cornerstone’s objective of ensuring the capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the licensee failed to account for the increased fuel oil consumption resulting from operation at a higher EDG frequency. Therefore, the licensee did not ensure that the minimum fuel oil level in the day tanks, as required per TS 3.8.1.4, was adequate to support the EDGs’ mission time at 110 percent for one hour. This finding has a cross cutting aspect in the area of Problem Identification and Resolution; Identification, because the licensee did not did not thoroughly evaluate the EDG fuel oil consumption when considering EDG frequency variation. Specifically, the licensee failed to translate applicable design bases into specifications which resulted in non-conservative TS. [P.1]

Inspection Report# : [2015007](#) (pdf)

## **Barrier Integrity**

**Significance:**  Dec 31, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

### **Failure to Maintain Design Control of Secondary Containment Interlock Doors**

A finding of very low safety significance (Green) and an associated NCV of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” was self-revealed on September 4, 2015, when the integrity of the Secondary Containment for Units 2 and 3 was not maintained for 39 minutes when interlock features designed to prevent both doors of a Secondary Containment interlock from being simultaneously open prevented the closure of Reactor Building to Turbine Building doors 47 and 48 following simultaneous operation during routine access of the interlock by plant personnel.

The performance deficiency was determined to be more than minor because it was associated with the Barrier Integrity cornerstone attribute of design control, and adversely affected the associated cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The finding screened as very low safety significance (Green) because the inspectors answered yes to the Barrier Integrity Screening Question C.1, Exhibit 3 of IMC 0609, Appendix A. This finding has a cross cutting aspect in the area of Human Performance, Conservative Bias, because the licensee did not use decision making-practices that emphasize prudent choices over those that are simply allowable. Specifically, the licensee failed to implement a

modification which addressed a known design deficiency in the 570 foot elevation Secondary Containment interlock in 2013. The licensee reasoned that the interlock was a low traffic area and that it would be unlikely that the doors would be open simultaneously. [H.14]  
Inspection Report# : [2015004](#) (*pdf*)

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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

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