Hatch 2
4Q/2015 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Oct 23, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Perform Adequate Circuit Breaker As-Found Testing
The NRC identified a Non-cited Violation of 10 CFR Part 50, Appendix B, Criterion XI "Test Control," for the failure to perform circuit breaker as-found electromechanical testing prior to inspecting, cleaning, and lubricating the mechanical components. The licensee planned to revise the test procedures to correct the deficiencies, and entered this violation into their Corrective Action Program as Condition Reports 10137545 and 10126677.

The performance deficiency was determined to be more than minor because it was associated with the Equipment Performance attribute of the Mitigating Systems Cornerstone, and adversely affected the cornerstone objective, in that inadequate periodic testing to detect deterioration toward an unacceptable condition, the likelihood that these breakers could unpredictably fail when called upon increases with time in service. The finding was determined to be of very low safety significance (Green) because it was a deficiency affecting the design or qualification of a mitigating structure, system, or component (SSC), and the SSC maintained its operability or functionality. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance (Section 1R21.2.b.1).
Inspection Report# : 2015007 *(pdf)*

Significance: G Oct 23, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Correct Nonconformances with Regulatory Guide 1.9-1971
The NRC identified a Non-cited Violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to correct non-conformances with the acceptance limits established for the emergency diesel generator (EDG) test requirements. The licensee performed an operability evaluation, and determined the EDGs were operable based on successful completion of the required Technical Specification surveillance testing. In addition, the licensee planned to revise the EDG test procedures suitable for RG 1.9-1971 testing requirements, and entered this violation into their Corrective Action Program as Condition Report 10133018.

The performance deficiency was determined to be more than minor because it was associated with the Equipment Performance attribute of the Mitigating Systems Cornerstone, and adversely affected the cornerstone objective, in that the failure to ensure that non-conformances with the acceptance limits were adequately incorporated into the EDG test procedures, which affected the reliability of the EDGs. The finding was determined to be of very low safety

significance (Green) because the finding was a deficiency affecting the design or qualification of a mitigating structure, system, or component (SSC), and the SSC maintained its operability or functionality. This finding has a cross-cutting aspect in the area of Problem Identification and Resolution (P.2) because the licensee failed to thoroughly evaluate issues to ensure that resolutions address causes, and extent of conditions, commensurate with their safety significance (PI.2)
Inspection Report# : 2015007 *(pdf)*

Significance: G Oct 23, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Assure that Class 1E Components were Qualified for Design Temperatures
The NRC identified a Non-cited Violation of 10 CFR Part 50, Appendix B, Criterion VII, "Control of Purchased Material, Equipment, and Services," for the licensee's failure to ensure that adequate environmental test requirements were satisfied before relying on safety-related components to perform their intended safety functions. As an immediate corrective action, the licensee performed an operability evaluation and determined the components were operable. In addition, the licensee indicated that they planned to determine adequate corrective actions to restore full qualification of these commercial grade components, and entered this issue into their Corrective Action Program as Condition Report 10138133.

The performance deficiency was determined to be more than minor because it was associated with the Design Control attribute of the Mitigating Systems Cornerstone, and adversely affected the cornerstone objective, in that the licensee failed to verify the environmental qualification of safety-related components to ensure their performance up to the expected temperature of 150 degrees F. The finding was determined to be of very low safety significance (Green) because it was a deficiency affecting the design or qualification of a mitigating SSC, and the SSC maintained its operability or functionality. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance
Inspection Report# : 2015007 *(pdf)*

Significance: G Oct 23, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Verify Design Basis Timing Margins for Safety Related Motor Operated Valves
Green: The NRC identified a Non-cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee's failure to evaluate if transients in control power voltage could affect the design basis margins for the timing of safety-related motor operated valves (MOVs).
The licensee planned to perform corrective actions to ensure that the safety analysis remains bounded, and entered this violation into their Corrective Action Program as Condition Report 10138053.

The performance deficiency was determined to be more than minor because it was associated with the Design Control attribute of the Mitigating Systems Cornerstone, and adversely affected the cornerstone objective, in that the failure to evaluate transients that effect the timing margins for NOVs affected the established reliability and capability of the valves. The finding was determined to be of very low safety significance (Green) because the deficiency did not result in actual loss of safety function. This finding was no assigned a cross-cutting aspect because the issue did not reflect current licensee performance

Inspection Report# : 2015007 *(pdf)*

Significance: G Oct 23, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Classify RCIC Sub-components as Safety-Related
The NRC identified a Non-cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the failure to classify components in accordance with Regulatory Guide 1.26 as specified by the Unit 2 Updated Final Safety Analysis Report, Section 3.2.2. As an immediate corrective action, the licensee performed an operability evaluation, and determined that the reactor core isolation cooling (RCIC) was operable. In addition, the licensee planned to reclassify the relief valve as safety-related, and entered this issue into their Corrective Action Program as Condition Reports 10132353, 10136685, and 10141965.

The performance deficiency was determined to be more than minor because it was associated with the Design Control attribute of the Mitigating Systems Cornerstone, and affected the cornerstone objective, in that inadequate classification of the relief valves affected the reliabi ity of safety-related function of the RCIC system. The finding was determined to be of very low safety significance (Green) because it was a deficiency affecting the design or qualification of a mitigating SSC, and the SSC maintained its operability or functionality. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance.

Inspection Report# : 2015007 *(pdf)*

Significance: G Sep 30, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Perform Adequate Surveillance on Fire Barriers and Penetration Seals
The NRC identified a non-cited violation (NCV) of Hatch Operating License Conditions (OLCs) 2.C.(3) and 2.C.(3)(a), for Units 1 and 2 respectively, for the licensee's failure to perform fire barrier penetration seal inspections in accordance with the requirements of Surveillance Requirement 2.1.1.c of Appendix B of the Fire Hazard Analysis (FHA). Specifically, the licensee failed to ensure that fire-rated penetrations and fire-rated barriers separating redundant safe-shutdown trains were adequate to keep a fire from spreading from one fire area to another. To restore compliance the licensee performed a 100 percent inspection of fire-rated penetrations to verify the material condition of the site's rated fire barrier penetrations.

The licensee's failure to perform fire barrier penetration seal inspections was a performance deficiency. The performance deficiency was determined to be more than minor because it was associated with the reactor safety Mitigating Systems cornerstone attribute of protection against external factors (i.e. fire), and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Based on the finding being of very low probability, the finding was determined to be of very-low safety significance (Green). The cause of the finding had a cross-cutting aspect in the area of Human Performance, field presence, because plant leadership did not reinforce standards and expectations, and did not ensure that deviations from standards and expectations were corrected promptly (H.2). Specifically, licensee oversight was not properly engaged to ensure that surveillances were performed adequately, and that deviations were addressed appropriately.

Inspection Report# : 2015003 *(pdf)*

Significance: G Jun 30, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to Maintain HELB Penetrations
A Green NRC identified non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion III, "Design Control," was identified for failure to maintain reactor building residual heat removal (RHR) diagonal room penetrations in the designed configuration. The violation was entered into the licensee's corrective action program as CR 10055943. The licensee issued work orders to seal the affected penetrations in accordance with design documents.

The licensee's failure to maintain the penetration seals in accordance with design drawings was a performance deficiency. The performance deficiency was more than minor because it was associated with the Design Control attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective in that the failure to maintain the design basis configuration compromised the capability of the RHR diagonal room wall to restrict a high pressure coolant injection (HPCI) high energy line break to the torus area. The finding was of very low safety significance (Green) because the loss of component function did not significantly affect the function of the train or system. The inspectors determined that the finding had a cross-cutting aspect of "work management" in the human performance area (H.5), because the licensee's work process did not control work activities such that nuclear safety was the overriding priority. (Section 1R15)
Inspection Report# : 2015002 *(pdf)*

Significance: G Mar 31, 2015
Identified By: Self-Revealing
Item Type: NCV Non-Cited Violation
Failure to Identify Embedded Conduit prior to Core Drill Operations
A self-revealing non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion V, "Procedures, Instructions, and Drawings," was identified for failure to identify existing embedded conduit in the vicinity of prescribed core drills location. The violation was entered into the licensee's corrective action program (CAP) as condition report (CR) 902506.

Failure to provide adequate instructions in Design Change Package (DCP) SNC467474 to perform core drills in the Unit 2 control building to support conduit installations was a performance deficiency. This performance deficiency is more than minor because it affected the Equipment Performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective in that 2P41F316A was rendered incapable of performing its' safety related function of closing in the event of an accident condition. The finding was screened as Green because the inoperability did not last longer than the technical specification (TS) allowed outage time. The inspectors determined the performance deficiency has a cross-cutting aspect of "work management" in the human performance area, because the licensee's work process did not identify and manage the risk commensurate to the core drill work.

Inspection Report# : 2015001 *(pdf)*

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Significance: G Mar 31, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to perform adequate surveys of air samples for alpha activity
An NRC-Identified non-cited violation (NCV) of 10 CFR 20.1501(a) was identified for failure to perform an adequate survey. Air samples obtained in the reactor cavity and on the refuel floor during a contamination event indicating greater than 0.3 beta-gamma Derived Air Concentration (DAC) fraction level were not analyzed for alpha activity as required by the licensee's procedures. Previous characterization of the area had determined the area to be an Alpha Level II area requiring additional assessment and evaluation of air samples. This violation was entered into the licensee's CAP as CR 10033022.

This finding is greater than minor because it was associated with the Occupational Radiation Safety Cornerstone attribute of Program and Process (Monitoring and RP Controls) and adversely affected the cornerstone objective in that failure to identify potentially significant contributors to internal dose could lead to unmonitored occupational exposures. The finding was determined to be of very low safety significance (Green) because it was not related to As Low As Reasonably Achievable (ALARA) Planning and the ability to assess dose was not compromised during these instances. The cause of this finding was directly related to the cross-cutting aspect of leaders ensuing equipment, procedures, and other resources are available and adequate in the Resources component of the Human Performance area. [H.1]
Inspection Report# : 2015001 *(pdf)*

Significance: G Mar 31, 2015
Identified By: NRC
Item Type: NCV Non-Cited Violation
Failure to perform complete analysis of air samples
An NRC-Identified non-cited violation (NCV) of TS 5.4.1 was identified for the failure of the licensee to perform complete quantitative analysis of air samples using approved counting equipment as required by the licensee's procedures. NMP-HP-301, Step 5.6, provides guidance for quantitative evaluation of air samples. On February 16, and 25, 2015, air samples for work activities in the Reactor Pressure Vessel head (RPV) and the Reactor Water Cleanup (RWCU) System heat exchanger were not quantitatively analyzed or evaluated for alpha activity even though the areas had been identified as having elevated alpha contamination levels. The licensee entered the issue into their corrective action program (CAP) as CR 10034556.

The finding was more than minor because it was associated with the Occupational Radiation Safety Program attribute of exposure control and affected the cornerstone objective of ensuring adequate protection of worker health and safety from exposure to radiation from airborne radioactive material during routine civilian nuclear reactor operation. Failure to identify potentially significant contributors to internal dose could lead to unmonitored occupational exposures. The finding was determined to be of very low safety significance (Green) because it did not involve: (1) an as low as is reasonably achievable finding, (2) an overexposure, (3) a substantial potential for overexposure, or (4) an impaired ability to assess dose related to As Low As Reasonably Achievable (ALARA) Planning and the ability to assess dose was not compromised during this instance. The cause of this finding was directly related to the cross-cutting aspect of following processes, procedures, and work instructions in the Procedure Adherence component of the Human Performance area.

Inspection Report# : 2015001 *(pdf)*

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 : March 01, 2016