## **Monticello**

## **Initiating Events**

Significance: N/A Sep 30, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

HOT SHORTS, OPEN CIRCUITS, OR SHORTS TO GROUND IN THE ASSOCIATED CIRCUITS MAY PREVENT OPERATION OF SAFE SHUTDOWN EQUIPMENT.

One violation of very low significance identified by the licensee has been reviewed by the inspectors. Corrective actions taken or planned by the

licensee appear reasonable.
Inspection Report#: 2001008(pdf)

Significance:

Aug 14, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

DESIGN CONTROL ISSUE ASSOCIATED WITH TURBINE BUILDING HELB BARRIER WALLS.

The inspectors reviewed a licensee event report (LER) which discussed inadequate high energy line break (HELB) barrier walls in the plant turbine building. The lack of proper design control for these walls constituted a Non-Cited Violation (NCV) of 10 CFR, Part 50, Appendix "B" requirements. This finding was of very low safety significance because of the low probability associated with the postulated HELB event and consequential failures of both divisions of essential 480 Vac power.

Inspection Report# : 2001007(pdf)

Significance:

Significance: May 30, 2001 Identified By: Self Disclosing Item Type: NCV NonCited Violation

#### FAILURE TO FOLLOW ESTABLISHED PROCEDURES.

On May 9, 2001, the inspectors reviewed plant operations' response to an unplanned power reduction to approximately 55 percent reactor power, which resulted from the inadvertent isolation of a condensate demineralizer. The failure of an operator to perform "manual air surge backwash" was determined to be a failure to follow procedures in accordance with Technical Specification 6.5. and a Non-Cited Violation was issued. This finding was of very low safety significance because of the availability of sufficient mitigating systems, and operator action could be credited for mitigating the event.

Inspection Report#: 2001005(pdf)

## **Mitigating Systems**

Significance:

Mar 01, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

#### INADEQUATE PROCEDURE FOR SCRAM DISCHARGE VOLUME LEVEL CALIBRATION.

During observation of an instrument calibration, the inspectors identified that licensee procedures for calibration of the reactor SCRAM discharge volume high level instruments were inadequate in that they did not require verification of proper valve alignment after calibration of individual instruments. The failure to include the verification requirement in the procedure was considered a Non-Cited Violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings." This finding was determined to have very low safety significance because verification of the position of the valves after all individual instruments were calibrated confirmed that they were properly aligned. This problem was reported to the NRC in Licensee Event Report 2001-001.

Inspection Report# : 2001011(pdf)

Significance:

Jan 19, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

#### INOPERABLE SNUBBERS NOT DECLARED INOPERABLE AS REQUIRED BY TECHNICAL SPECIFICATIONS.

On January 19, 2001, the licensee identified that they were not in compliance with the ASME Boiler & Pressure Vessel Code, Section XI, 1986 Edition. The licensee determined that they had failed to involve the Authorized Nuclear Inservice Inspector (ANII) in repair and replacement activities for safety-related snubbers. One noncited violation was identified against Technical Specification 3.6.H.2.c for failure to take actions required by the technical specifications for inoperable snubbers. In addition, two non-cited violations were identified for failure to report via 10 CFR 50.72 and for the failure to follow procedures in accordance with Technical Specification 6.5. Later, on January 24, the licensee determined that a plant shutdown was required by Technical Specifications. The risk significance of this finding was determined to be very low because the licensee was able to determine through engineering evaluations that the as-found condition of the snubbers had no adverse effect on the supported components and that they would retain their structural integrity in the event of a design basis seismic event. (Section 1R14.2) Inspection Report#: 2001002(pdf)

Significance:

Jan 19, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO MAKE NOTIFICATIONS AS REQUIRED BY 10 CFR 50.72.

Comments listed under NCV 50-263/01-02-01.

Inspection Report#: 2001002(pdf)

Significance:

Jan 19, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO FOLLOW ESTABLISHED PROCEDURES FOR SURVEILLANCE AND TESTING AS REQUIRED BY TECHNICAL SPECIFICATIONS.

Comments listed under NCV 50-263/01-02-01.

Inspection Report# : 2001002(pdf)

Significance: N/A Nov 17, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to perform a 10 CFR 50.59 screening or evaluation for USAR changes made in accordance with 10 CFR 50.68

No color. The licensee failed to follow the station procedure requirements for preparing a 10 CFR 50.59 screening or evaluation for Updated Safety Analysis Report (USAR) changes that resulted from implementation of criticality accident controls in accordance with 10 CFR 50.68. This is considered a Non-Cited Violation of 10 CFR 50, Appendix B, Criterion V. This violation was identified by the NRC and promptly entered by the licensee into the corrective action program as Condition Report 20004536. There was no significant impact to the cornerstone because the licensee's Safety Review Item evaluation ensured that criticality accident monitoring requirements were met by demonstrating full compliance with 10 CFR 50.68. Changes to the USAR necessitated by the Safety Review Item were required to be made in accordance with 10 CFR 50.59, but were not.

Inspection Report#: 2000017(pdf)

Significance: N/A Nov 17, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to peform an adequate 10 CFR 50.59 evaluation for modification of interlock circuits described in the USAR

No color. The licensee failed to follow station procedure requirements for preparing a 10 CFR 50.59 evaluation that resulted from a modification that bypassed the Emergency Core Cooling System load shed trip/lockout signal to the Residual Heat Removal Service Water (RHRSW) pumps following a design basis Loss of Coolant Accident. The evaluation failed to address the appropriateness of bypassing the interlock and the acceptability of deleting the USAR wording which described the interlock. This is considered a Non-Cited Violation of 10 CFR 50, Appendix B, Criterion V. This violation was identified by the NRC and promptly entered by the licensee into the corrective action program as Condition Report 20004494. There was no significant impact to the cornerstone because it hypothesized the extremely low probability, simultaneous occurrence of a Loss of Coolant Accident and Loss of Offsite Power. Loss of offsite power, in conjunction with a loss of coolant accident would require load shedding and sequencing, which would trip running RHRSW pumps and necessitate clearing the interlock in order to restart them.

Inspection Report#: 2000017(pdf)

Significance:

Aug 15, 2000

Identified By: NRC Item Type: FIN Finding

COMPENSATORY ACTIONS FOR INACCESSIBLE VALVE.

GREEN. The inspectors identified that the licensee may be unable to implement compensatory actions for operator workarounds associated with

the inboard residual heat removal to waste surge tank valve due to the inaccessibility of plant areas during accident conditions. The risk significance of this issue was determined to be very low because Emergency Operating Procedures provided alternate actions that would be taken in the event that the compensatory actions for valve operation were unsuccessful. The alternate actions would have assured that core cooling would have been maintained.

Inspection Report#: 2000006(pdf)

Significance:

Jun 07, 2000

Identified By: NRC Item Type: FIN Finding

#### DESIGN DEFICIENCY IN STANDBY GAS TREATMENT SYSTEM.

GREEN. On February 21, 2000, the licensee identified a design deficiency associated with the Standby Gas Treatment System which would allow a small portion of secondary containment atmosphere to bypass the filter train during an event. The impact on offsite dose due to the additional bypass leakage pathway was determined to be minimal. The risk significance of this issue was very low since the effectiveness of filtration systems during severe accidents was small. The event was documented in Licensee Event Report (LER) 50-263/2000-005.

Inspection Report#: 2000004(pdf)

Significance:

Jun 07, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

#### TIMELY ACTIONS FOR INOPERABLE SECONDARY CONTAINMENT DAMPERS NOT TAKEN.

GREEN. On February 28, 2000, the licensee identified that the previous practice of removing the Standby Gas Treatment System control power impacted the ability of the secondary containment isolation dampers to perform their isolation function. The licensee's failure to understand the interactions between the Standby Gas Treatment System and the secondary containment isolation dampers resulted in the damper's eight-hour limiting condition for operation being exceeded on several occasions. The risk significance of this issue was very low since the effectiveness of secondary containment isolation systems during severe accidents was small. The inspectors identified a noncited violation for failure to comply with the requirements of Technical Specification 3.7.B.1.a.

Inspection Report#: 2000004(pdf)

Significance:

Nov 26, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

## INADEQUATE TEST PROCEDURE FOR LPCI 5 MINUTE TIMER BYPASS SWITCH MODIFICATION.

The inspectors reviewed the preoperational test for the Division II Low Pressure Core Injection 5 Minute Timer Bypass Modification. During the testing evolution, an error associated with a jumper bypass in the test procedure resulted in the loss of shutdown cooling to the reactor vessel. The failure of the licensee to adequately provide procedural controls for this test jumper bypass is contrary to the requirements of Regulatory Guide 1.33, Revision 2, Appendix A, and constitutes a Non-Cited Violation of Technical Specification 6.5.A.1. The finding was of very low safety significance because of the low decay heat load present in the reactor and the licensee's ability to manually recover shutdown cooling in a short period of time.

Inspection Report#: 2001010(pdf)

Significance:

Nov 16, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

#### TECHNICAL SPECIFICATION SURVEILLANCE TEST REQUIREMENTS NOT MET.

The team identified an example of inadequate corrective action for surveillance test procedures failing to meet Technical Specification (TS) requirements. One Non-Cited Violation of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions," was identified. The issue was of very low safety significance since there was no current apparent impact on operability of the affected safety systems. Inspection Report#: 2001016(pdf)

Significance: Oct 24, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

## INADVERTENT REACTOR VESSEL PARTIAL DEPRESSURIZATION.

The team identified that operator actions in the inadvertent venting of the reactor while in hot shutdown conditions due to deficient procedure constituted a significant human performance error. The issue was of very low safety significance since the actual impact on plant safety was

minimal.

Inspection Report#: 2001016(pdf)



Oct 23, 2001

Identified By: NRC Item Type: FIN Finding

SCRAM RESPONSE COMPLICATED BY LOCK UP OF BOTH FEEDWATER REGULATING VAVLES.

The inspectors monitored the licensee's response to an inadvertent reactor scram which occurred on October 23, 2001. The lock up of both feedwater regulating valves in the fully open position complicated operating crew response to the scram. The finding was of very low safety significance because the impact on the operating crew was minimal, and operator action was available to restore system functions.

Inspection Report#: 2001009(pdf)



Oct 01, 2001

Identified By: NRC
Item Type: FIN Finding

INADEQUATE POST-MAINTENANCE TESTING FOLLOWING CIRCUIT BREAKER OVERHAUL.

The inspectors reviewed licensee post-maintenance testing activities associated with restoration of a 480 Vac load center supply breaker following a 10-year overhaul. This finding was of very low safety significance because the loss of function of the No. 13 diesel generator was of a short

duration.

Inspection Report#: 2001009(pdf)



Sep 30, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO ESTABLISH PROCEDURAL GUIDANCE TO PREVENT THE ALLOWABLE ACCUMULATION OF WATER ALLOWED BETWEEN THE DIESEL GENERATOR BUILDING AND AN ERECTED BERM.

The inspectors identified a procedure deficiency for mitigation of flooding events. Licensee procedures related to flooding failed to establish a maximum allowable level of water accumulation between an erected berm and emergency diesel generator buildings. Excessive accumulation of water would cause hydraulic lift of the floor causing failure of the associated diesel generator. The lack of procedural controls to adequately respond to flooding of the emergency diesel generator constituted a Non-Cited Violation of 10 CFR, Part 50, Appendix B, Criterion V, "Instruction, Procedures and Drawings." These findings were of very low safety significance because of the low probability of occurrence of a flooding event that would rise to the elevation required to cause hydraulic lift of the emergency diesel generator floor.

Inspection Report# : 2001008(pdf)



ance: Aug 03, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to include actions in operating procedures to ensure that design basis requirements were not exceeded

Design calculation CA-97-157, indicated that the residual heat removal (RHR) pump rooms would exceed the environmental qualification (EQ) design basis temperature limit of 140 degrees Fahrenheit for the RHR pumps following a loss of coolant accident (LOCA) if two RHR pumps continued to run more than 25.7 hours. There was no operating procedure requiring the shutdown of one pump prior to exceeding the 25.7 hour limit.

Inspection Report#: 2001015(pdf)



May 30, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

FIRE PROTECTION ADMINISTRATIVE CONTROLS.

The inspectors identified a room in Fire Zone 3-B, adjacent to safety-related switchgear and the standby liquid control system, that did not have fire detection or suppression equipment and contained a significant amount of transient combustibles. The lack of fire protection administrative controls constituted a Non-Cited Violation of 10 CFR, Part 50, Appendix "R" requirements. This finding was of very low safety significance because a fire in this room would affect only one safe shutdown train, and did not impact the 3-hour fire barrier between safe shutdown trains.

Inspection Report#: 2001005(pdf)

## **Barrier Integrity**

Significance:

Mar 01, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

#### INADEQUATE CORRECTIVE ACTIONS FOR SUSPECT RELAYS.

Corrective actions for an earlier problem with some Struthers-Dunn relays were not effective in preventing a similar failure of a Struthers-Dunn relay in October 2000 that rendered a train of the control room ventilation system inoperable. The failure to take effective corrective actions for the earlier event was determined to be a Non-Cited Violation of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action." This finding was determined to have very low safety significance because the other train of control room ventilation remained operable. The problem with the relay in October 2000 was documented in Licensee Event Report 2000-015.

Inspection Report#: 2001011(pdf)

Significance: N/A Feb 13, 2002

Identified By: Licensee

Item Type: NCV NonCited Violation

## REFUELING TESTING IDENTIFIES CONTAINMENT ISOLATION VALVE LEAKAGE GREATER THAN ALLOWED BY THE TECHNICAL

SPECIFICATIONS.

Licensee Identified Violation. See Inspection Report 50-263/02-02(DRP) Section 4OA3.2 and description for closure of LER 50-263/2001-012,

"Refueling Testing Identifies Containment Isolation Valve Leakage Greater Than Allowed by the Technical Specifications."

Inspection Report#: 2002002(pdf)

Significance: N/A Aug 14, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

#### FAILURE TO REMOVE TORUS BELLOWS SHIPPING BOLTS.

Violations of very low significance identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the

licensee appear reasonable. Inspection Report#: 2001007(pdf)

## **Emergency Preparedness**

## **Occupational Radiation Safety**

## **Public Radiation Safety**

## **Physical Protection**

Significance:

Jun 12, 2000

Identified By: NRC Item Type: FIN Finding

#### COMPUTER ACCESS LEVELS COULD ALLOW BADGE DATA CHANGE WITHOUT VALIDATION.

GREEN. Several security supervisors or staff had computer access levels that could allow badge data to be changed, or badges to be fabricated and activated, without another individual validating the accuracy of the data. This situation could have allowed a single individual to bypass some security controls.

Inspection Report#: 2000012(pdf)



Significance: Jun 12, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

#### UNTIMELY ACTIONS BY SUPERVISOR FOR FFD ISSUE.

GREEN. The inspector identified a Non-Cited Violation [of 10 CFR 26.24(3) and the licensee's fitness for duty Guideline No. 1] for failure of a supervisor to take timely action on a Fitness-For-Duty Issue. A licensee supervisor received information from an employee that the odor of alcohol was detected on another employee. The supervisor took no further action to evaluate the situation until 1 and ½ hours after receiving the information.

Inspection Report#: 2000012(pdf)

#### **Miscellaneous**

Significance: N/A Mar 01, 2001

Identified By: NRC Item Type: FIN Finding

#### CORRECTIVE ACTION PROGRAM ADEQUATE.

The team identified that the licensee was generally effective at identifying problems and putting them into the corrective action program. A probing series of audits and self-assessments of the corrective action program and oversight by offsite and onsite review groups in the past year have resulted in the implementation of many program improvements and the planning of additional changes for the near future. These enhancements included strengthened procedural guidance, standardization of root cause evaluations, increased accountability for timeliness goals, and earlier involvement of licensed operators in the initial evaluation of equipment concerns. Notwithstanding these implemented and planned improvements, the team and NRC inspectors conducting reviews of the problem identification and resolution process as part of the routine baseline inspection program, have continued to identify examples of inadequate problem identification and evaluation, untimely problem evaluation and resolution, and ineffective corrective actions. The inspectors did not find any reluctance by station employees to raise safety concerns.

Inspection Report#: 2001011(pdf)

Significance: N/A Nov 01, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

#### SRO OPERATING WITHOUT 10 CFR 55 LICENSE

An individual was found to be directing control room licensed operators with an expired senior reactor operator license.

Inspection Report# : 2000018(pdf)

Significance:

Aug 14, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

## FAILURE TO FOLLOW TECHNICAL SPECIFICATIONS RELATING TO THE INSERVICE TESTING OF ECCS CHECK VALVES.

The inspectors reviewed a LER associated with a February 24, 2001, plant shutdown and cooldown to cold shutdown required by Technical Specifications (TS). The licensee identified multiple check valves in various safety-related systems which had been inadequately tested, rendering the associated systems or system trains inoperable. The failure to perform appropriate check valve testing as required was determined to constitute a NCV of the licensee's TS, Section 4.15.B. This finding was of very low safety significance because the licensee's subsequent testing demonstrates that all the components in question would have been capable of performing their safety functions during accident conditions. Inspection Report#: 2001007(pdf)

Significance:

Aug 14, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

# FAILURE TO FOLLOW TECHNICAL SPECIFICATIONS RELATING TO INSERVICE INSPECTION AND REPLACEMENT OF SRV TOPWORKS.

The inspectors reviewed a LER associated with a January 29, 2001, plant shutdown initiated due to TS. The licensee identified that safety relief valve topworks replacement activities had not been performed in compliance with the ASME Boiler and Pressure Vessel Code, rendering all the safety relief valves (SRV) inoperable. The failure to conduct SRV topworks replacement activities in accordance with the applicable sections of the ASME Boiler and Pressure Vessel Code was determined to constitute a NCV of the licensee's TS, Section 3.15.A.1. This finding was of very low safety significance because the licensee's subsequent analyses demonstrated that the SRVs would have been capable of performing their safety

functions during accident conditions. Inspection Report# : 2001007(pdf)

Last modified : March 28, 2002