

## Byron 1

## Initiating Events

## Mitigating Systems

**Significance:** SL-IV Dec 29, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**FAILURE TO OBTAIN PRIOR NRC APPROVAL FOR A CHANGE TO THE DIESEL GENERATOR VENTILATION SYSTEM THAT RESULTED IN AN UNREVIEWED SAFETY QUESTION**

The inspectors identified a Severity Level IV Non-Cited Violation. In July 1998, the licensee implemented a change to the diesel generator (DG) ventilation system that involved an unreviewed safety question and failed to obtain prior NRC approval in accordance with the 10 CFR 50.59 requirements in effect at the time. Specifically, the licensee failed to adequately evaluate the defeating of the automatic actuation of the DG ventilation system and replacing it with operator manual actions to recover the system's function. This change increased the probability of occurrence of a malfunction of equipment important to safety previously evaluated in the safety analysis report. Because the SDP was not designed to assess the significance of violations that potentially impact or impede the regulatory process, this issue is being dispositioned using the traditional enforcement process in accordance with Section IV of the NRC Enforcement Policy. The result of this violation (when a DG was inoperable due to the implementation of the procedure) was assessed significance through the SDP and the severity level of the violation was based on the significance determination. This issue was considered to have more than minor significance, in that, it had a credible impact on safety by affecting the operability, availability, reliability, or function of the DGs. Because the licensee caused one DG to be inoperable for about 21 days which was longer than the outage time allowed by Technical Specification, the inspectors performed a bounding Phase II SDP analysis. The inspectors evaluated the loss of offsite power and a loss of offsite power coincident with a loss of one division of AC power accident sequences using the following assumptions: (1) minimal credit for operator recovery actions, (2) the DG was inoperable at the start of the event; and (3) the exposure time for this type of failure occurred for an entire year instead of just during the winters months. The result of these analyses determined that this issue was of very low safety significance (i.e., Green). The regional senior reactor analyst also performed a qualitative Phase III SDP analysis and determined that external conditions would not be sufficient to increase the safety significance of the issue. Therefore, this issue was classified as a Severity Level IV violation of 10 CFR 50.59. However, because this issue is of very low safety significance and it was captured in the licensee's corrective action program, this issue is being treated as a Non-Cited Violation, consistent with Section VI.A.1 of the NRC Enforcement Policy.

Inspection Report# : [2001016\(pdf\)](#)

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**Significance:** Oct 15, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**FAILURE TO IDENTIFY AND CORRECT 1A EDG ROOM VENTILATION CONTROLLER PROBLEM THAT RESULTED IN THE EDG BEING INOPERABLE**

The inspectors identified that on October 5, 2001, the licensee failed to promptly identify and correct the defective Unit 1A emergency diesel generator (EDG)room ventilation damper controller, which, combined with the actions to manually close the outside damper, resulted in the inoperability of the 1A EDG. This finding was determined to be of very low safety significance because the failure did not result in an actual loss of the safety function for greater than the 14 days allowed by the Technical Specification (TS) if the licensee had completed the required TS actions to ensure operability of the other EDGs and associated equipment. A Non-Cited Violation of 10 CFR 50, Appendix 50, Criterion XVI, was identified.

Inspection Report# : [2001015\(pdf\)](#)

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**Significance:** Mar 31, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**FAILURE TO ACCOMPLISH POST MAINTENANCE TESTING REQUIREMENTS AFTER INSTALLING STAINLESS STEEL FLEXIBLE HOSES ON THE U1&U2 CV PUMPS**

The inspectors identified a Non-Cited Violation for the licensee's failure to accomplish appropriate post-modification testing requirements after installing stainless steel flexible hoses on the Unit 1 and Unit 2 centrifugal charging pumps. As a result, several of the hoses were improperly installed. The finding was of very low safety significance because there was no immediate failure concern for the hoses in question and the licensee entered this finding into its corrective action program.

Inspection Report# : [2001006\(pdf\)](#)

**Significance:** SL-IV Aug 19, 2000

Identified By: NRC

Item Type: VIO Violation

**DISPOSITION OF URI 50-454/455-99020-02(DRP) EA 00-103, NOV LETTER 7/21/2000**

In January, May, July, and November 1999, a mechanical maintenance individual deliberately failed to perform the visual inspection of 15 portable fire extinguishers at monthly intervals in the Turbine and Auxiliary Buildings. Furthermore, in March, May and June 1999, the individual deliberately failed to perform the visual inspection of 13 fire hose stations at monthly intervals in the turbine and Auxiliary Buildings.

Inspection Report# : [2001010\(pdf\)](#)Inspection Report# : [2000012\(pdf\)](#)**G****Significance:** Jul 25, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

**FAILURE TO PROPERLY MONITOR THE FUNCTION OF THE VA VENTILATION DAMPERS FOR THE AUXILIARY FEEDWATER MOTOR DRIVEN PUMPS WITHIN THE MAINTENANCE RULE**

The inspectors identified that the licensee failed to appropriately monitor the ventilation supply dampers for the motor driven auxiliary feedwater (AF) pumps within the scope of the licensee's maintenance rule program. A noncited violation was issued. The damper failures reviewed did not result in a loss of safety function for the motor driven AF pumps and with the diesel driven AF pumps still available, this issue was determined to be of very low safety significance.

Inspection Report# : [2000009\(pdf\)](#)**Barrier Integrity****G****Significance:** Sep 30, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

**INADEQUATE CORRECTIVE ACTIONS FOLLOWING SG PORV TEST FAILURES**

Following the July 26 and 27, 2001 failures of 1D steam generator power operated relief valve to fully stroke closed, a condition adverse to quality, the licensee failed to promptly correct the condition as evidenced by the similar failure of the same valve on August 10, 2001. This finding had a credible impact on safety because the licensee did not identify and correct the cause of the failure of the valve to fully stroke closed, thus the valve could not be relied upon to fulfill the containment isolation function. Although this finding could have affected the integrity of the reactor containment, it did not result in an actual open pathway in the physical integrity of the reactor containment. Therefore, the inspectors determined that this finding was of very low significance. The inspectors identified a Non-Cited Violation for the failure to correct a condition adverse to quality.

Inspection Report# : [2001011\(pdf\)](#)**G****Significance:** Aug 13, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**REACTOR POWER LIMIT EXCEEDED DUE TO IMPROPERLY CALCULATED FEEDWATER MASS FLOWRATE UTILIZED IN REACTOR POWER CALORIMETRIC.**

The licensee identified two discrepancies with the feedwater flow calibration constants utilized in the calculation of feedwater mass flowrate and reactor thermal power level, which affected the accuracy of the thermal power calorimetric calculation in a non-conservative direction. Because of these discrepancies, the licensee had operated both Unit 1 and Unit 2 in excess of 100 percent power as defined in their respective Facility Operating Licenses between May 2000 and May 2001. This is a violation of the operating licenses.

Inspection Report# : [2001010\(pdf\)](#)**G****Significance:** Jul 28, 2001

Identified By: Licensee

Item Type: NCV NonCited Violation

**FAILURE TO FOLLOW PROCEDURE RESULTED IN AN INOPERABLE CONTROL ROOM VENTILATION FILTRATION SYSTEM.**

Technical Specification 5.4.1.a requires, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Appendix A of Regulatory Guide, Revision 2, February 1978, specifies authorities and responsibilities for safe operations and shutdown as an example of an administrative procedure. Nuclear Station Procedure OP-AA-101-102, "Roles and Responsibilities of On-Shift Personnel," Revision 3, Step 4.4.5, states that the unit supervisors are to ensure operations are conducted within the bounds of the TS in accordance with the Operations Standards and approved procedures. On July 18, 2001, during a maintenance activity that rendered the Unit 0B control room ventilation filtration actuation instrumentation inoperable, operators failed to correctly align the redundant control room ventilation filtration system train in the normal mode or emergency mode as required by Unit 0 Byron Operating Limits Procedure 3.7, "LCOAR [Limiting Condition for Operation Action Requirement], Control Room Ventilation Filtration System Actuation Instrumentation TS LCO [Limiting Condition for Operation] 3.3.7," Revision 2, Step A.

Inspection Report# : [2001010\(pdf\)](#)**G****Significance:** Jun 30, 2001

Identified By: NRC

Item Type: FIN Finding

**FAILURE TO CORRECTLY EVALUATE THE OPERABILITY OF THE 1B REACTOR CONTINMENT FAN COOLER**

The inspectors identified that licensed operators failed to correctly evaluate the operability of the Unit 1B reactor containment fan cooler (RCFC)

following the inservice test failure of essential service water valve 1SX147B. This finding was considered more than minor since it has a credible impact on the safe operation of the plant because correctly evaluating operability ensures that sufficient equipment is available to mitigate the consequences of an accident. In this case, the operators did not recognize that the failure of 1SX147B resulted in the associated RCFC being inoperable. This failure to correctly determine operability was evaluated using the SDP and determined to be of very low safety significance since the system failure did not result in an actual reduction of the reactor containment atmosphere pressure control function and the licensee entered this issue into its corrective action program. No violation of NRC requirements occurred.

Inspection Report# : [2001009\(pdf\)](#)

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**Significance:** Dec 31, 2000

Identified By: Licensee

Item Type: NCV NonCited Violation

#### **FAILURE TO MAINTAIN LOW TEMPERATURE OVER PRESSURE PROTECTION SYSTEM TECHNICAL SPECIFICATION REQUIREMENTS DUE TO HUMAN PERFORMANCE ERRORS**

Technical Specification 3.4.12 requires, in part, that a low temperature over pressure protection system be operable with no safety injection pumps capable of injecting into the reactor coolant system while in operational Modes 4 and 5. On October 8 and 9, 2000, for approximately 4 hours, the 1A Safety Injection Pump was capable of injecting into the reactor coolant system while Unit 1 was in operational Mode 5.

Inspection Report# : [2000019\(pdf\)](#)

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## Emergency Preparedness

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## Occupational Radiation Safety

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**Significance:** Jan 12, 2001

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO ADEQUATELY POST AND BARRICADE A HIGH RADIATION AREA**

The inspector identified a Non-cited Violation for the failure to provide an adequate barricade and to conspicuously post a high radiation area within the radioactive waste truck bay in accordance with Technical Specification 5.7.1. The finding was of very low significance because the inspector concluded that it was unlikely that an individual could have inadvertently entered the area and obtained an overexposure.

Inspection Report# : [2001004\(pdf\)](#)

**Significance:** SL-IV Oct 24, 2000

Identified By: Licensee

Item Type: VIO Violation

#### **DELIBERATE VIOLATION OF RADIATION PROTECTION PROCEDURES (EA# 00171 NOV LETTER DATED 9/22/2000)**

The licensee identified that an individual deliberately violated radiation protection procedures on November 2, 1999. Specifically, the individual entered a High Contamination and High Radiation Area within the reactor containment building without having the proper authorization. Prior to the entry, the individual was instructed by his supervisor to work in another area of containment and was told by radiation protection staff that he could not enter the High Radiation Area without a pre-job briefing and a specific radiation work permit. Although no radiological consequences resulted from the individual's actions within the area, the NRC determined that the individual's actions constituted a deliberate violation of the licensee's procedure and issued the licensee a Severity Level IV Notice of Violation.

Inspection Report# : [2001004\(pdf\)](#)

Inspection Report# : [2000016\(pdf\)](#)

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**Significance:** Jun 16, 2000

Identified By: NRC

Item Type: NCV NonCited Violation

#### **FAILURE TO POST A HIGH RADIATION AREA**

The inspector identified a noncited violation for the failure to post a high radiation area in accordance with 10 CFR 20.1902(b). Specifically, accessible areas of the 1A letdown heat exchanger room, having radiation levels exceeding 100 millirem per hour at 30 centimeters (from the surface of the heat exchanger), were not posted as a high radiation area. Instead, the licensee had placed a caution sign with the words "NO ENTRY" on a plexiglass partition, which limited access to the area. Although the area was not adequately posted, the inspector concluded that it was unlikely that an individual could have inadvertently entered the area and obtained an overexposure. Consequently, this finding was determined to be of very low safety significance.

Inspection Report# : [2000010\(pdf\)](#)

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## Public Radiation Safety

## Physical Protection



**Significance:** Jun 30, 2001

Identified By: NRC

Item Type: FIN Finding

### **A PORTION OF ONE ZONE OF THE PERIMETER INTRUSION ALARM SYSTEM WAS SUSCEPTIBLE TO PENETRATION.**

The inspectors observed that a portion of one zone of the licensee's perimeter intrusion alarm system was susceptible to penetration as demonstrated by a simulated jump by the licensee using their testing device. This issue had a credible impact on safety because an adversary must first penetrate the protected area intrusion alarm system by a covert or overt action. Based on the inspectors visual observation, the area in question appeared vulnerable and was tested by the licensee at the request of the inspectors. Repetitive tests by the licensee confirmed that the area could be jumped at approximately four feet. This finding was evaluated through the SDP and determined to be of very low safety significance because no intrusions had occurred, and an adversary would have encountered some level of force on their way to a target set. Additionally, there had not been greater than two findings in the last four quarters. There is no requirement for this type of test in the licensee's approved security plan. Therefore, no violation occurred. When tested using licensee's test procedure, the system passed. However, the inspectors concluded that the licensee's test procedure was inadequate to identify this type of vulnerability.

Inspection Report# : [2001009\(pdf\)](#)



**Significance:** May 22, 2001

Identified By: NRC

Item Type: FIN Finding

### **PARTICIPANTS IN THE STRESS FIRE WEAPON COURSE FAILED TO MEET THE LICENSEE'S LEVEL OF PROFICIENCY.**

The inspectors observed that security personnel who participated in the licensee's Stress Fire Weapon Course on May 22, 2001, failed to demonstrate the level of weapon proficiency necessitated by the licensee's established protective strategy plan. This issue had a credible impact on safety because the purpose of the stress fire course is to demonstrate proficiency in the skills necessary to defend against the design basis threat. The problems identified included a course layout that differed from the licensee's procedure, target identification that differed from the procedure, and completion times that significantly exceeded those specified in the procedure. This finding was evaluated through the SDP and determined to be of very low safety significance because no intrusions had occurred, and there had not been greater than two findings in the last four quarters. There is no specific requirement for a stress fire course in the licensee's approved security plan; therefore, no violation occurred.

Inspection Report# : [2001009\(pdf\)](#)

## Miscellaneous

**Significance:** N/A Nov 15, 2001

Identified By: NRC

Item Type: FIN Finding

### **PROBLEM IDENTIFICATION AND RESOLUTION SUMMARY**

The inspectors concluded that the licensee adequately identified, evaluated, and resolved problems within the requirements of the corrective action program (CAP). In general, the significance threshold for entering issues into the corrective action program appeared appropriate. However, three issues of very low safety significance (Green) were identified which were related to an inconsistency in the threshold for initiating a condition report. In general, corrective actions specified were appropriate based on the identified causes and were effective in preventing recurrence of significant conditions adverse to quality. Licensee audits and assessments were thorough and identified issues similar to NRC observations. During interviews, station personnel stated they were not reluctant to raise safety issues; however, some staff members expressed hesitance to question management decisions. Additionally, while the overall program allowed the station to identify and resolve problems, a potential weakness in the station's implementation of the program related to training timeliness was identified.

Inspection Report# : [2001015\(pdf\)](#)

**Significance:** N/A Aug 13, 2001

Identified By: NRC

Item Type: FIN Finding

### **ADVERSE TREND IN OPERATOR HUMAN PERFORMANCE [THIS ISSUE WAS DISCUSSED AGAIN IN INSPECTION REPORT 454/455-2001-14.]**

Similar operator human performance errors were identified in the initiating events, mitigating systems, and barrier integrity cornerstones. The inspectors noted 6 operator errors associated with procedural adherence and knowledge-based decisions over the last 12 months. These operator errors resulted in the inoperability of systems designed to mitigate the consequences of accidents and/or provide barrier integrity, resulted in the violation of TS requirements, and resulted in plant transients. While the risk significance associated with each of the individual events was very low, the number of operator human performance related incidents indicated an adverse performance trend which constitutes a significant cross-cutting issue.

Inspection Report# : [2001010\(pdf\)](#)

**Significance:** N/A Dec 15, 2000

Identified By: NRC

Item Type: FIN Finding

**PROBLEM IDENTIFICATION AND RESOLUTION SUMMARY**

The inspectors determined the licensee staff were effective in identifying and resolving problems in accordance with the corrective action program. Also, the inspectors concluded that the licensee staff communicated an acceptable level of responsibility for identifying and entering safety issues into the corrective action program. However, the inspectors also identified several examples of minor problems that did not result in adverse consequences and which were similar to problems identified by licensee staff during self-assessments. The inspectors identified some evaluations of condition reports that were not rigorously performed or were narrowly focused. As a result, the developed corrective actions were not always appropriate to the circumstances or were not totally effective. The inspectors also determined the licensee staff did not always develop condition reports to document and track the resolution of problems identified during effectiveness reviews of corrective actions for past condition reports.

Inspection Report# : [2000020\(pdf\)](#)

Last modified : March 01, 2002