

## Clinton

# 2Q/2003 Plant Inspection Findings

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## Initiating Events

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## Mitigating Systems

**Significance:**  May 23, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

### **FAILURE TO FOLLOW OPERABILITY EVALUATION PROCEDURE FOR A THROUGH-WALK LEAK IN ASME CLASS III PIPING.**

A finding of very low safety significance was identified by the inspectors for failure to follow procedures as required by technical specification. This failure to following procedure resulted in an inadequate operability evaluation being performed by the licensee. This issue also resulted in the licensee failing to declare the affected system inoperable as required by NRC regulatory guidance documents and licensee procedures. This issue was more than minor because an inadequate operability evaluation could affect the mitigating system cornerstone objective as it relates to the availability of the Division I service water system and emergency diesel generator. This issue was of very low safety significance because this qualification deficiency did not result in loss of function per GL 91-18. This issue was a non-cited violation of Technical Specification 5.4 which required the implementation of written procedures in NRC Regulatory Guide 1.33, Appendix A.

Inspection Report# : [2003004\(pdf\)](#)

**Significance:** SL-III Jan 24, 2003

Identified By: NRC

Item Type: VIO Violation

### **FAILURE TO PROVIDE COMPLETE AND ACCURATE INFORMATION TO THE NRC WHICH IMPACTED A LICENSING DECISION.**

Clinton Station management personnel informed NRC Region III by letter dated September 24, 2002, that two operators who had been examined for their operator licenses in August 2002 had long standing medical conditions that warranted reporting to the NRC for review. Both operators were issued a license by the NRC on August 30, 2002. The licensee originally sent NRC Form 396s for both operators to Region III on June 26, 2002, without including their medical records and did not recommend any license restrictions. One operator had a history of myocardial infarction and the other had a history of coronary heart disease. The medical conditions described above are considered potentially disqualifying in accordance with American Nuclear Standards Institute/American Nuclear Society (ANSI/ANS) 3.4, 1983, and should have been reported to the NRC with a request for issuance of a license with a "no solo" restriction. When the licensee informed the NRC on September 24, 2002, of the medical conditions of the two operators there still was no request for an amended "no solo" license for either operator. Because the issue affected the NRC's ability to perform its regulatory function, it was evaluated with the traditional enforcement process. The finding was determined to be of low safety significance because the operators had not acted in a solo capacity prior to having their license's amended. However, the regulatory significance was important because the incorrect information was provided under sworn statement to the NRC and impacted a licensing decision for the two individuals. The issue was preliminarily determined to be an apparent violation of 10 CFR 50.9.

Inspection Report# : [2003002\(pdf\)](#)

**Significance:**  Sep 30, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**VIOLATION OF PROCEDURAL REQUIREMENTS CAUSED BY HUMAN PERFORMANCE IN THAT THE LICENSEE FAILED TO CONTROL AND DOCUMENT WORK ON A RISK-SIGNIFICANT, SAFETY-RELATED SYSTEM.**

The inspectors identified a finding of very low safety significance while observing maintenance on the Division I Emergency Diesel Generator (EDG). Specifically, the inspectors identified that one of the insulated bearing bracket bolts on the generator was not properly tightened. The performance issue associated with this finding involved workers performing work steps not specified in the work procedure. Compounding the issue was that once these additional work steps were performed, they were not documented in the work procedure. The finding was more than minor because, if left uncorrected, the EDG could have become inoperable which could impact the Mitigating Systems cornerstone. The finding was of very low safety significance because the condition was found and corrected before the EDG was made operable. This finding was a violation of Technical Specification 5.4.1; however, because the licensee placed the violation into its corrective action program, this was determined to be a NCV.

Inspection Report# : [2002008\(pdf\)](#)

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## Barrier Integrity

**Significance:**  Feb 20, 2003

Identified By: Self Disclosing

Item Type: NCV NonCited Violation

**FAILURE TO ISOLATE AN INOPERABLE PRIMARY CONTAINMENT ISOLATION VALVE WITHIN THE ALLOWED ACTION TIME**

A finding of very low safety significance was identified through a self-revealing event when operators failed to close a motor operated valve prior to de-energizing it when taking the valve out of service. The open valve resulted in an inoperable containment isolation pathway. The primary cause of this finding was related to the cross-cutting area of human performance. This finding is more than minor because it involved the attribute of configuration control under the Barrier Integrity Cornerstone. The finding is of very low safety significance because actual containment integrity was not breached. The failure to isolate an inoperable containment penetration was identified as a Non-cited Violation of Technical Specification 3.6.1.3.

Inspection Report# : [2003003\(pdf\)](#)

**Significance:**  Sep 30, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**THE LICENSEE FAILED TO ESTABLISH WRITTEN OPERATIONAL TEST PROCEDURES TO DEMONSTRATE THE FUNCTIONAL CAPABILITY OF THE SX MAKEUP TO THE SPENT FUEL POOL.**

The inspectors determined that the licensee failed to establish written operational test procedures to verify the functionality of the seismically qualified makeup flow path from the shutdown service water system to the spent fuel pool. The finding was more than minor because, if left uncorrected, silting in the line and pipe wall thinning could result in increased degradation and a more significant safety concern and potentially impacting the Barrier Integrity

cornerstone. The finding was of very low safety significance because the as-found conditions, while degraded from original installation, met design requirements. This finding was a violation of 10 CFR 50, Appendix B, Criterion XI "Test Control;" however, because the licensee placed the violation into its corrective action program, this was determined to be a NCV.

Inspection Report# : [2002008\(pdf\)](#)

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## Emergency Preparedness

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## Occupational Radiation Safety

**Significance:**  Dec 12, 2002

Identified By: Self Disclosing

Item Type: NCV NonCited Violation

### **FAILURE TO CONDUCT ADEQUATE SURVEY OF AIRBORNE RADIOACTIVE MATERIALS**

A finding of very low safety significance was identified through a self-revealing event, when a maintenance mechanic received an unexpected uptake of radioactive material during a valve maintenance procedure resulting in a 115 millirem committed effective dose equivalent (CEDE) dose. This self-revealing finding was caused by inadequate implementation of radiation protection procedures and improper work oversight by the radiation protection staff. The finding is more than minor because it affects the occupational radiation safety cornerstone objective for exposure/contamination control and monitoring. Although an unexpected intake occurred, the radiological conditions associated with the work activity were not of a magnitude sufficient to produce a substantial potential for an exposure in excess of regulatory limits. Therefore, the finding was of very low safety significance (i.e., not an as-low-as-reasonably-achievable finding, not an overexposure or substantial potential for an overexposure, and did not compromise the ability to assess dose). A Non-Cited Violation of 10 CFR 20.1501(a)(1)(ii) was identified for failure to conduct surveys as necessary to assess the radiological conditions and to control exposure to airborne radioactive material.

Inspection Report# : [2002009\(pdf\)](#)

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## Public Radiation Safety

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## Physical Protection

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## Miscellaneous

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