# **Initiating Events**

# Mitigating Systems

Significance: SL-IV Mar 31, 2007 Identified By: NRC Item Type: NCV NonCited Violation Manual Operator Actions Allowed Due To An Inadequate 10 CFR 50.59 Evaluation. An NRC-identified Severity Level IV non-cited violation (NCV) was identified for an inadequate 10 CFR 50.59

evaluation. The licensee proceduralized manual actions in place of automatic actions to close the door to an adjacent office to maintain the main control room (MCR) pressure boundary operable without prior NRC review and approval.

Violations of 10 CFR 50.59 potentially impact the NRC's ability to perform it's regulatory function. Therefore, this finding was subject to traditional enforcement. This finding was determined to be of very low safety significance because the door only impacted the radiological response of the MCR, the door was capable of being closed, and procedural guidance was in place to close the door. In accordance with the NRC Enforcement Policy, Supplement I.D.5, this finding was determined to be a Severity Level IV violation. This violation has been entered into the licensee's corrective action program as Condition Report (CR) 2006112331. Inspection Report# : 2007002 (pdf)



Significance: Mar 31, 2007 Identified By: NRC Item Type: NCV NonCited Violation Pre-conditioning of RHR/CS Room Cooler Valves An NRC-identified NCV of 10 CFR Part 50, APP B, Criterion XI, Test Control, was identified for pre-conditioning of the Residual Heat Removal (RHR)/Core Spray (CS) pump room cooler water supply valves. The surveillance test

procedure sequence caused these valves to be opened and closed prior to performing the documented stroke time testing.

The inspectors determined this finding is greater than minor because it is associated with the procedure quality attribute and affected Mitigating Systems cornerstone objective in that potential valve and other component performance deficiencies could have been masked. The inspectors determined the finding was of very low safety significance because the finding did not result in a loss of safety function. This finding is directly related to the operating experience (OE) implementation aspect of the problem identification and resolution cross-cutting area because the licensee had reviewed prior OE on unacceptable preconditioning, but failed to prevent pre-conditioning during the testing sequence. This violation was entered into the licensee's corrective action program as CR 2007102031.

Inspection Report# : 2007002 (pdf)

#### Significance: SL-IV Sep 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Report Safety Relief Valve Test Results Outside Technical Specification Limits.

An NRC-identified non-cited violation of 10 CFR 50.73 (a)(2)(i)(B) was identified for failure to report past conditions prohibited by plant Technical Specifications (TSs). The inspectors determined that, during the most recent operating cycle for both Units 1 and 2, several main steam safety/relief valves exceeded the TS lift setting tolerance.

This finding was evaluated using the traditional enforcement process because the failure to accurately report events

has the potential to impact the NRC's ability to perform its regulatory function. This finding was determined to be a Severity Level IV violation based on Supplement I of the NRC Enforcement Policy. Inspection Report# : 2006004 (pdf)



Identified By: NRC Item Type: NCV NonCited Violation

Failure to Use Adequate Test Instrumentation During Room Cooler Performance Tests. The team identified a Green non-cited violation (NCV) of 10 CFR Part 50, Appendix B, Criterion XI, Test Control, for not assuring adequate test equipment or suitable environmental conditions were used for testing safety related room coolers. Specifically, the licensee used instrumentation with excessive instrument inaccuracies and did not establish the proper test conditions with an adequate room heat load as described in GL 89-13. The licensee entered this finding into their corrective action program as CR-2006107057 and planned to reestablish a baseline for room cooler performance.

This finding is greater than minor because it is related to the equipment performance attribute of the mitigating systems cornerstone and affects the objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. This finding is of very low safety significance because the operability evaluation performed by the licensee determined that the margin afforded by the excess design capacity of these room coolers and the actual assumed accident heat loads were such that the room coolers could perform their safety function. The cause of the finding is related to the cross-cutting element of human performance in the aspect of resources. Inspection Report# : 2006007 (pdf)



Identified By: NRC Item Type: NCV NonCited Violation Failure to Analyze Circuit Components with Motor Thermal Overload Devices Bypassed. The team identified a Green non-cited violation (NCV) of 10 CFR Part 50. Appendix B, Criterion III, Design Control, relating to a design deficiency which has existed since initial plant operation. Specifically, the team identified that the licensee bypassed the thermal overload protection of several 600 Volt motors and failed to evaluate and fully understand the effect on each motor's circuit components to ensure that they would be able to withstand motor overload currents without catastrophic failure. The licensee initiated a corrective action to evaluate the effect of overcurrent on 600 Volt motor circuit components and entered the finding into their corrective action program as CR-2006107110.

This finding is greater than minor because it is associated with the design control attribute of the mitigating systems cornerstone and affected the cornerstone objective of ensuring reliable, available, and capable systems that respond to initiating events to prevent undesirable consequences. This finding is of very low safety significance because no loss of safety function occurred and only limited equipment on one motor control center would be lost in an overcurrent condition due to selective tripping. The cause of the finding is related to the cross-cutting element of problem identification and resolution in the aspect of operating experience. Inspection Report# : 2006007 (pdf)

Significance: Jul 14, 2006 Identified By: NRC Item Type: NCV NonCited Violation

#### Alternate Boron Injection Supply Hose not suitable for pump suction application.

The team identified a Green non-cited violation (NCV) of 10 CFR Part 50 Appendix B, Criterion III, Design Control, for improperly analyzing and allowing the use of a collapsible fire hose in the transfer of borated water from the standby liquid control (SLC) pump moat to the high pressure safety injection (HPCI) pump suction during alternate SLC injection in accordance with emergency operating procedures. This finding has been entered into the licensee's corrective action program as CR 2006106806.

This finding is greater than minor because it is related to the design control attribute of the mitigating systems cornerstone and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). This finding is of very low safety significance because although the alternate boron injection flowpath would not function reliably, the actual safety system function was not lost due to the availability of the two trains of the normal SLC system. Inspection Report# : 2006007 (pdf)

#### **Barrier Integrity**

#### **Emergency Preparedness**

#### **Occupational Radiation Safety**

### **Public Radiation Safety**

### **Physical Protection**

Although the NRC is actively overseeing the Security cornerstone, the Commission has decided that certain findings pertaining to security cornerstone will not be publicly available to ensure that potentially useful information is not provided to a possible adversary. Therefore, the <u>cover letters</u> to security inspection reports may be viewed.

## Miscellaneous

Last modified : August 24, 2007