

Byron 1

4Q/2007 Plant Inspection Findings

Initiating Events

Significance:  Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO FIRE PROOF STRUCTURAL STEEL BEAMS TO ACHIEVE A 3-HOUR FIRE RATING.

The inspectors identified an NCV of Byron Station's Operating License Condition 2.C.6 for failure to maintain a 3-hour rated firewall in the control room heating, ventilation and air conditioning (HVAC) equipment room.

Specifically, the walls between the upper cable spreading rooms and the control room HVAC equipment were not fireproofed to achieve a 3-hour rating as required by the fire protection report and applicable plant drawings. The licensee entered this issue into its corrective action program for resolution and implemented compensatory measures that included hourly fire watches.

This finding was more than minor because it was associated with the external factor attribute of the Initiating Events cornerstone related to fire and it affected the cornerstone's objective to limit the likelihood of fire that upset plant stability and challenge critical safety functions during shutdown as well as power operations. This finding was of very low safety significance because there were no fire ignition source scenarios that would have caused the structural steel beams to weaken and the ceiling to collapse.

Inspection Report# : [2007003](#) (*pdf*)

Significance:  Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

DESIGN BASIS ANALYSIS FOR THE POSTULATED DROP OF A REACTOR VESSEL HEAD DURING REFUELING WAS NOT UP-TO-DATE.

The inspectors identified a finding of very low safety significance and associated NCV for a failure to establish measures to assure that regulatory requirements and the design basis were correctly translated into procedures as required by 10 CFR 50 Appendix B Criterion III. Specifically, the procedures related to the reactor vessel head lift did not correctly reflect in a non conservative direction the design lift height. As immediate corrective actions, the licensee incorporated compensatory measures to lower reactor cavity water level during the head lift to ensure the actual airdrop distance was bounded by the analysis.

It was more than minor because it involved the equipment performance attribute of the Initiating Events Cornerstone Objective. The finding was determined to be of very low safety significance (Green) because as part of the additional corrective actions, the licensee's subsequent calculations showed the lift height was acceptable due to margin gained from the much heavier head weight assumed in their analysis.

This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, operating experience because the licensee failed to implement and institutionalize operating experience through changes to their procedures (P.2(b)).

Inspection Report# : [2007003](#) (*pdf*)

Mitigating Systems

Significance:  Sep 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

INADEQUATE COMMON MODE FAILURE EVALUATION

The inspectors identified a NCV of Technical Specification 3.8.1 for the licensee's failure to determine the applicability of a potential common cause failure for the remaining operable Diesel Generator (D/G) following the failure during testing of the Unit 1 Train B D/G. Technical Specification 3.8.1 required that the operability of the remaining D/G be demonstrated by either determining the operable D/G is not inoperable due to common cause failure or to start the remaining D/G starts in accordance with TS Surveillance Requirement 3.8.1.2. Contrary to the TS requirements, the remaining D/G was not started and the assessment the licensee performed did not adequately determine that the remaining D/G was not inoperable due to a common cause failure. This finding is related to the cross-cutting areas of Human Performance for failure to use conservative assumptions in decision making (H.1(b)). Licensee corrective actions included revising the assessment to adequately demonstrate that the remaining D/G was not inoperable due to a common cause failure and retraining the involved personnel.

The inspectors concluded that the finding was more than minor because if the condition had existed on the remaining D/G and left uncorrected, it could have degraded and impacted the operability and availability of the remaining D/G. The finding was of very low significance because the inspectors determined that the finding did not represent an actual loss of a safety function.

Inspection Report# : [2007004](#) (*pdf*)

Significance: SL-IV Sep 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

INADEQUATE BASIS IN 10 CFR 50.59 EVALUATION ASSOCIATED WITH A SPECIAL TEST PROCEDURE

The inspectors identified a NCV of 10 CFR 50.59(d)(1) for the licensee's failure to document an evaluation that provided a basis for the determination that the change, test, or experiment did not require a license amendment. Specifically, for Special Test Procedure SPP-07-002, "Test of 1B DG Voltage Regulator Following Maintenance Via SX Pump Start," the licensee failed to provide an evaluation as to why disconnecting the offsite electrical power feed to the emergency bus during power operation with an inoperable diesel generator did not present more than a minimal increase in the likelihood of occurrence of a malfunction of a structure system or component important to safety previously evaluated in the Updated Final Safety Analysis Report. The licensee entered the appropriate limiting condition of operation for the offsite power circuit during the test, entered this issue into the corrective action program, and initiated actions to complete a 10 CFR 50.59 evaluation to determine if these procedure changes were acceptable without a license amendment. The primary cause of this issue was related to the cross-cutting area of Human Performance for failure to use conservative assumptions in decision making and to adopt a requirement that demonstrates the proposed action is safe in order to proceed (H.1(b)).

Because the issue potentially impacted the NRC's ability to perform its regulatory function, this finding was evaluated using the traditional enforcement process. The finding was determined to be more than minor because the inspectors could not reasonably determine that the special test procedure, that affected the Updated Final Safety Analysis Report described design function of equipment important to safety, would not have ultimately required NRC prior approval. Based upon the Phase 1 screening, the inspectors concluded that the issue was of very low safety significance.

Inspection Report# : [2007004](#) (*pdf*)

Significance:  Sep 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

DISCREPANCIES WITH TORNADO ANALYSIS

The inspectors identified a NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," having very low safety significance involving the ultimate heat sink (UHS) capability of mitigating the effects of tornado missiles. Specifically, the inspectors identified that the licensee failed to demonstrate that the ultimate heat sink can withstand the effects of tornado borne missiles rendering all cooling tower fans out of service. In addition, the licensee failed to update their current analysis to show the higher heat load generated as a result of power up-rate, steam generator replacement and the ultimate heat sink design basis reconstitution. In response to the issue, the licensee implemented compensatory actions including allowing only one fan to be inoperable at a time and performing an operability evaluation.

The finding was more than minor because the temperature of the UHS could have exceeded its design value in the event of a tornado and a loss of all cooling towers. The finding was of very low safety significance because the inspectors determined that the UHS was in a non-conforming but operable condition and the issue screened as Green using the SDP Phase 1 screening worksheet.

Inspection Report# : [2007004](#) (*pdf*)

Significance:  Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

ALTERNATIVE SHUTDOWN USING THE REMOTE SHUTDOWN PANEL.

The inspectors identified a finding of very low safety significance and an associated NCV of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," for failure to ensure that all testing necessary to demonstrate that the Unit 1 and 2 remote shutdown panels (RSPs) will perform satisfactorily in-service be identified and conducted. Specifically, the licensee failed to periodically test applicable (i.e., important to safety) components (e.g., control switches) on the RSPs to ensure the operability and functional performance of the RSP components and the operability of their associated systems as a whole. The licensee's corrective actions were to immediately begin testing of the instrumentation and controls located at the RSP and to continue the testing in accordance with a schedule that would allow timely completion.

The finding was more than minor because the finding was associated with the equipment performance attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). The finding was of very low safety significance because the finding did not represent an actual loss of the instrumentation indications and control functions at the RSP, since the 1B0A PRI-5 and 2B0A PRI-5 procedures' "Response Not Obtained" column provided an alternative shutdown capability method using local manual actions and the Fire Hazards Panel.

Inspection Report# : [2007003](#) (*pdf*)

Significance:  Mar 31, 2007

Identified By: NRC

Item Type: FIN Finding

INADEQUATE SETPOINT CONTROL OF THE OIL LEVEL TO SAFETY RELATED PUMPS.

The inspectors identified a finding for the licensee's failure to maintain setpoint control of the constant level oilers. Specifically, the licensee did not incorporate the vendor's recommendation on setting the oil level for the essential service water pumps. This condition increased the challenges to the proper functioning of the lubricating oil and thus to the bearings of the safety-related pumps. The licensee subsequently reset the oil level for the pumps to the recommended setting and entered this issue into their corrective action program.

this finding is more than minor because of the potential for degradation of oil and bearings to safety related components, which could adversely affect their availability and reliability. This finding is of very low safety significance because no bearings had been damaged due to the high oil levels despite operating in this condition for many years and no significant oil degradation had occurred. The inspectors did not identify a violation of regulatory requirements. However, the cause of the finding is related to the cross-cutting element of problem identification and resolution, particularly the thoroughness of the extent of condition review. (Section 1R04.2)

Inspection Report# : [2007002](#) (*pdf*)

Significance:  Mar 31, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

ADEQUACY OF SAFE SHUTDOWN PROCEDURES TO ADDRESS DRAINING OF THE RWST.

The inspectors identified a Non-Cited Violation (NCV) of the Byron Station Operating License for the failure to have

adequate alternate safe shutdown procedure. Specifically, licensee's procedure BOP FR-1, "Fire Response Guidelines," did not include adequate steps and instructions to prevent the draining of the refueling water storage tank (RWST) into the containment sump in the event of a fire in the auxiliary electrical equipment room (AEER) or the control room. The licensee implemented appropriate procedure changes for both the AEER and control room fire zones to isolate all potential RWST drain paths.

The finding is greater than minor because it affected the attribute of procedure quality for protection against external factors and it impacted the objective of the mitigating systems cornerstone. The failure to provide adequate instructions in the alternate shutdown procedure to promptly prevent the draining of the RWST to the containment sump could have adversely impacted the operators' ability to promptly take appropriate actions and could have complicated safe shutdown in the event of a fire. The finding was of very low safety significance based on Phase 2 and Phase 3 SDP evaluations completed by the Region III senior reactor analyst (SRA) in accordance with IMC 0609, Appendix F, "Fire Protection Significance Determination Process." (Section 1R05.2)

Inspection Report# : [2007002](#) (*pdf*)

Significance:  Jan 16, 2007

Identified By: NRC

Item Type: FIN Finding

FAILURE TO HAVE SETPOINT CONTROL OF THE CONSTANT LEVEL OILERS ON SAFETY-RELATED PUMPS

The inspectors identified a finding of very low safety significance associated with the failure to maintain control of the setpoints for constant level oilers. This condition increased the challenges to the proper functioning of the lubricating oil and thus to the bearings to the safety-related pumps.

This finding was considered more than minor because of the potential for the degradation of oil/bearings to safety-related components which would increase their unavailability and unreliability. This finding was of very low safety significance because no bearings had been damaged due to the high or low oil levels despite operating in this condition for many years and the oil had only been moderately impacted. The licensee's corrective actions included assessing the setpoints of other safety related and non-safety related pumps, verifying no pumps had been damaged, and revising the work order template to include the reference to the corporate procedure for the setting of constant level oilers. No violation of NRC requirements occurred.

Inspection Report# : [2006005](#) (*pdf*)

Barrier Integrity

Significance:  Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO PROPERLY REINSTALL A FLOOD SEAL HATCH / HIGH ENERGY LINE BREAK BARRIER.

The inspectors identified a finding of very low safety significance and an associated NCV of Technical Specification (TS) 5.4.1 regarding procedure adherence when a flood seal hatch, which also served as a High Energy Line Break (HELB) barrier, was found to have been improperly reinstalled following maintenance.

The finding was more than minor because it involved the attribute of procedure adherence and could have affected containment isolation valves necessary to ensure isolation of the secondary side of the steam generators. As such, this finding affected the containment barrier cornerstone. The finding was of very low safety significance because the finding did not represent an actual loss of the Unit 1 Auxiliary Feedwater System Containment Isolation Valves. Subsequently, the licensee repaired the hatch to ensure a proper seal.

This finding has a cross-cutting aspect in the area of human performance, work practices, supervisory oversight because the licensee's planned work activities did not effectively ensure the protection of a safety system in a mild

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 [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

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