

D.C. Cook 1

3Q/2006 Plant Inspection Findings

Initiating Events

Significance:  Jun 29, 2006

Identified By: NRC

Item Type: FIN Finding

Inadequate Preventive/Corrective Maintenance on Turbine Building Sump Overflow Check Valve 12-DR-129

The inspectors identified a finding of very low safety significance. The licensee failed to perform adequate preventive and corrective maintenance on Turbine Building sump overflow check valve 12-DR-129. As a result, the valve was found in a significantly degraded condition such that it would not function to mitigate the consequences of a design basis seiche event. No violation of regulatory requirements was identified. Immediate corrective actions to address this finding included replacing the check valve and implementing a preventive maintenance activity to ensure that it would function.

This finding was of more than minor significance because it was associated with the Protection Against External Factors attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective of limiting the likelihood of events that upset plant stability and challenge critical safety functions during power operations since inadequate preventive and corrective maintenance led to the significantly degraded condition of 12-DR-129. Although this issue affected the ability of the check valve to mitigate the consequences of a design basis seiche event, the Regional Senior Reactor Analyst determined that this finding was of very low safety significance during a Phase 3 Significance Determination Process evaluation because considering the seiche initiating event frequency, the change in core damage frequency for this finding was calculated to be well below 1.0E-6. This finding affected the cross-cutting area of problem identification and resolution because the licensee failed to identify and correct the degraded valve condition. Corrective actions that were taken were not timely, were not commensurate with the significance of the issue, and early corrective actions were ineffective.

Inspection Report# : [2006004\(pdf\)](#)

Mitigating Systems

Significance:  Jun 29, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Potential External and Internal Flooding Impact on Safe Shutdown Equipment in the Lake Screen House

The inspectors identified a finding of very low safety significance with an associated Non-Cited Violation of 10 CFR 50, Appendix B, Criteria III, "Design Control." The licensee failed to correctly translate the design basis into specifications for the essential service water (ESW) system by ensuring that ESW system components in the Lake Screen House would be protected to the 595' elevation as described in Section 10.6 of the Updated Final Safety Analysis Report, in the event of flooding due to a design basis seiche event. The licensee was evaluating corrective actions for this issue at the end of the inspection period. No immediate actions were necessary due to the present low lake level.

This finding was of more than minor significance because it was associated with the Design Control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences since the failure to maintain adequate design control for the affected ESW system components in the Lake Screen House could possibly have resulted in damage to safe shutdown plant equipment during a design basis seiche event. The finding was of very low safety significance because it was a design or qualification deficiency confirmed not to result in loss of operability.

Inspection Report# : [2006004\(pdf\)](#)

G

Significance: Jun 29, 2006

Identified By: NRC

Item Type: FIN Finding

Inadequate Functionality Evaluation for Degraded Check Valve Condition

The inspectors identified a finding of very low safety significance. The licensee did not adequately evaluate the functionality of Turbine Building sump overflow check valve 12-DR-129, while the valve was in a significantly degraded condition such that it would not function to mitigate the consequences of a design basis seiche event. No violation of regulatory requirements was identified. Immediate corrective actions to address this finding included a detailed calculation to determine the potential for flooding in the emergency diesel generator (EDG) rooms to support a past operability evaluation for the EDGs.

This finding was of more than minor significance because if left uncorrected, the failure to properly evaluate the functionality of equipment important to safety could result in incorrectly concluding that the equipment was functional. The inspectors determined that this finding was related to the Protection Against External Factors attribute of the Mitigating Systems cornerstone and adversely impacted the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Consistent with the Phase 3 Significance Determination Process evaluation performed in Section 1R06.b.2, this finding was determined to be of very low safety significance. This finding affected the cross-cutting area of problem identification and resolution because the licensee did not apply appropriate rigor and detail to its evaluation of the non-functional check valve; and as a result, the potential impact on safe shutdown equipment was not evaluated and timely corrective actions were not taken.

Inspection Report# : [2006004\(pdf\)](#)**Significance: SL-IV** Jun 21, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Inappropriate Deletion of Technical Requirements Manual Sections

The inspectors identified a Severity Level IV Non-Cited Violation of 10 CFR 50.59(d)(1) for the licensee's failure to perform a safety evaluation for the deletion of four sections of the Technical Requirements Manual (TRM). Specifically, the licensee deleted Sections 8.4.7, Tavg Lower Limit, 8.6.1, Ice Bed Temperature Monitoring System, and 8.6.2, Inlet Door Position Monitoring System, and 8.3.7, Post Accident Monitoring (PAM) Instrumentation, Table 8.3.7-1 without evaluating these changes per the requirements of 10 CFR 50.59.

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, at the time of the inspection, could not reasonably determine that the Updated Final Safety Analysis Report change, which adversely affected equipment important to safety, would not have ultimately required NRC approval. The inspectors completed a significance determination of the underlying technical issue using NRC's inspection manual chapter 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations," and answered "no" to the Mitigating Systems screening questions in the Phase 1 Screening Worksheet. Specifically, even though these TRM sections along with their associated surveillance requirements were deleted, the licensee was able to show that all deleted surveillance requirements had been performed satisfactorily and within their prescribed frequency in spite of the deletion. This issue was entered into the licensee's corrective action program.

Inspection Report# : [2006009\(pdf\)](#)**Significance: SL-IV** Jun 21, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Perform 10 CFR 50.59 Evaluation for Modification to the 2-East Centrifugal Charging Pump

The inspectors identified a Severity Level IV Non-Cited Violation of 10 CFR 50.59(d)(1) for the licensee's failure to perform a safety evaluation for the modification of the 2-East Centrifugal Charging Pump (CCP). Specifically, the licensee performed modifications to the 2-East Centrifugal Charging Pump that required more restrictive frequency requirements to be established than were already in the Technical Specifications. Had a 10 CFR 50.59 evaluation been performed, as required, the evaluation should have shown that a change to the Technical Specifications (TS) was required so that the new required frequency value could be incorporated into the applicable TS Surveillance Requirements. This issue was entered into the licensee's corrective action program.

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 modification of the 2-East CCP would not have ultimately required NRC approval. The inspectors evaluated the finding using IMC 0609, Appendix A, Phase 1 screening for the mitigating systems cornerstone and determined that the finding was of very low safety significance because they were able to answer "no" to the Mitigating Systems screening questions in the Phase 1 Screening Worksheet. Specifically, while the 10 CFR 50.59 evaluation, and ultimately the required license amendment, were not performed as required, administrative controls were put into place after the modification was performed such that the CCP would always be able to perform its function. Inspection Report# : [2006009\(pdf\)](#)



Significance: G Jun 21, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Non-Conservative Verification of Containment Average Air Temperature

The inspections identified a Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," that was of very low safety significance. Specifically, verification of containment lower compartment average temperature per Surveillance Requirement 3.6.5.2 was being performed using temperature readings that were not representative (and non-conservative) of the true average temperature in the lower containment. The issue was entered into the licensee's corrective action program.

The issue was more than minor because it was associated with the Mitigating System Cornerstone attribute of "Design Control," and affected the cornerstone objective of ensuring the capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the methodology for determining lower containment average temperature was non-conservative and did not account for the heightened temperatures that were experienced in the Steam Generator (SG) Enclosure Rooms. Had average temperature been above the TS limits, temperatures during a Design Basis Accident could have exceeded the ratings of safety related mitigating equipment thereby challenging the functionality of the equipment. This finding was of very low safety significance, because the inspectors answered "no" to all five questions under the Mitigating Systems Cornerstone column of the Phase 1 worksheet. Specifically, after performing a calculation that included the SG Enclosure Rooms, the licensee determined that under worst case historical conditions, average air temperature was 119.5 degrees which was still less than the TS requirement of 120 degrees F.

Inspection Report# : [2006009\(pdf\)](#)

Barrier Integrity

Emergency Preparedness

Significance: SL-III Aug 01, 2006

Identified By: NRC

Item Type: VIO Violation

the licensee made changes without Commission approval to Fission Product Barrier Matrix Emergency Action Level (EAL) 3.3L in its Emergency Plan

The inspectors identified an apparent violation of 10 CFR 50.54(q) involving 10 CFR 50.47(b)(4). Title 10, Part 50, Section 54(q) of the Code of Federal Regulations states in-part, "the nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to this part." Title 10, Part 50, Section 47(b)(4) of the Code of Federal Regulations states in part, "a standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee." The licensee made and implemented a change to its emergency plan emergency action level (EAL) scheme on April 16, 2003, which appeared to decreased the effectiveness of the emergency plan without prior NRC approval.

Specifically, the licensee changed the EAL to remove the condition, "release of secondary coolant from the associated

steam generator to the environment is occurring,” from the Fission Product Barrier Matrix EAL for a loss of containment barrier due to a steam generator secondary side release. The revised emergency action level, “secondary line break outside containment results in release (greater than 30 minutes) to the environment,” added a non-conservative 30 minutes before meeting this emergency action level. There is a potential that a release condition could have existed which would not have been declared, resulting in either no action or delayed action by off-site authorities when measures to protect the health and safety of the public were warranted. In a previous 1995 correspondence between the NRC and the licensee concerning a proposal to revise the licensee’s EALs, the licensee proposed to implement a similar change to its EALs; however, the NRC specifically provided a written response to the licensee which indicated that a revision to the EAL which included a 30 minute criteria was unacceptable.

The apparent violation was considered to be more than minor because the licensee made changes to the emergency plan and procedures that decreased the effectiveness of the plan without prior approval of the NRC. Because this apparent violation affected the NRC’s ability to perform its regulatory function, it was evaluated using the traditional enforcement process. There were no actual emergency events associated with this EAL during the time the change was in effect; however, the failure of the licensee to meet an emergency planning standard involving assessment does have regulatory significance.

Notice of Violation Issued October 6, 2006, ML062790406.

Inspection Report# : [2006501\(pdf\)](#)

Occupational Radiation Safety

Public Radiation Safety

Significance:  Mar 31, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Perform Adequate Checks of the Automatic Gas Analyzer System Oxygen Monitor Channel

An inspector-identified finding of very low safety significance and an associated violation of NRC requirements were identified for the failure to perform adequate daily checks for the in-service oxygen monitor channel of the automatic gas analyzer system, as required by Technical Specifications.

The issue was more than minor because if left uncorrected the issue could become a more significant safety concern, since this monitor provides early indication of a potential explosive gas mixture in the waste gas decay system. The issue represents a finding of very low safety significance because alternate methods were available to assess the potential for an explosive gas mixture in the waste decay system, and, therefore, there was minimal actual risk to the public. A Non-Cited Violation of Technical Specification Surveillance Requirement 4.3.3.9 was identified for the failure to perform adequate daily checks for the in service oxygen monitor channel of the automatic gas analyzer system. Corrective actions planned by the licensee for this finding include enhancing the applicable procedure that governs the daily check of the oxygen monitor channel of the automatic gas analyzer to provide more specific direction to plant staff on equipment acceptance criteria.

Inspection Report# : [2006003\(pdf\)](#)

Physical Protection

[Physical Protection](#) information not publicly available.

Miscellaneous

Last modified : December 21, 2006