



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-8064**

April 27, 2001

Mr. J. V. Parrish (Mail Drop 1023)
Chief Executive Officer
Energy Northwest
P.O. Box 968
Richland, Washington 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - INSPECTION REPORT NO. 50-397/01-02

Dear Mr. Parrish:

On March 31, 2001, the NRC completed a routine resident inspection at your Columbia Generating Station for the period January 6 through March 31, 2001. The enclosed report presents the results of this inspection. The inspection results were discussed with you and other members of your staff on April 10, 2001.

The inspectors examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspectors examined a selection of procedures and representative records, observed activities, and conducted interviews with personnel.

Based on the results of this inspection, three issues were identified. Two of the issues were evaluated under the significance determination process and were determined to have very low safety significance (green). These issues involved inadequate heat trace circuit testing and the failure to properly verify and validate that certain containment exhaust and purge valves could open to vent containment under accident conditions. The inspectors also identified one issue that was not subject to the significance determination process. This issue involved the failure to obtain NRC approval prior to implementing a change to your fire protection program that reduced fire brigade training. This issue has no color. These issues have been entered into your corrective action program and are discussed in the summary of findings and in the body of the attached inspection report. The inadequate heat trace circuit testing and the reduced fire brigade training issues involved violations of NRC requirements; however, because of their low safety significance, these violations are being treated as noncited violations, consistent with Section VI.A of the Enforcement Policy.

If you contest the violations or the significance of the noncited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 6111 Ryan Plaza Drive, Suite 400, Arlington Texas 76011; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Columbia Generating Station.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

William B. Jones, Chief
Project Branch E
Division of Reactor Projects

Docket No: 50-397
License No: NPF-21

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NRC Inspection Report No.
50-397/01-02

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- Scott Morris (**SAM1**)
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No: 50-397
License No: NPF-21
Report No: 50-397/01-02
Licensee: Energy Northwest
Facility: Columbia Generating Station
Location: Richland, Washington
Dates: January 7 through March 31, 2001
Inspectors: G. D. Repogle, Senior Resident Inspector, Project Branch E, DRP
J. P. Rodriguez, Resident Inspector, Project Branch E, DRP
J. F. Melfi, Project Engineer, Project Branch E, DRP
Approved By: W. B. Jones, Chief, Project Branch E, Division of Reactor Projects

ATTACHMENT: Supplemental Information

SUMMARY OF FINDINGS

IR 05000397-01-02; on 1/7-3/31/2001; Energy Northwest; Columbia Generating Station. Resident Report; Adverse Weather; Fire Protection; Surveillances.

The report covers a 12-week period of routine resident inspection from January 7 through March 31, 2001. The inspection identified two findings that had very low safety significance and one finding of no color. Two of these findings resulted in noncited violations. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Manual Chapter 0609 "Significance Determination Process." Findings for which the Significance Determination Process does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

A. Inspector Identified Findings

Cornerstone: Mitigating Systems

- Green. The inspectors identified that the licensee had not tested heat trace circuits for Division III service water and condensate storage tank piping since initial plant startup. The failure to perform adequate testing to ensure the operability of the safety-related Division III service water heat trace circuits was a violation of 10 CFR 50, Appendix B, Criterion XI (Test Control). This violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy. The problem is in the licensee's corrective action program as Problem Evaluation Request 200-2037.

The inspectors determined that the issue had very low risk significance using the Phase 1 significance determination process. The finding affected only the mitigation system cornerstone and was determined not to result in a loss of function per Generic Letter 91-18, Revision 1, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions" (Section 1R01).

- Green. The inspectors identified that engineering had not properly verified and validated an emergency operating procedure action for venting the containment. Specifically, the licensee had no documented testing or analysis that demonstrated certain containment exhaust and purge valves could open with containment pressure approaching 92 psig. The problem is in the licensee's corrective action program as Problem Evaluation Request 201-0248.

The inspectors determined that the issue had very low risk significance because of the very low core damage and large early release frequencies associated with the event sequences where the valves would be utilized with elevated containment pressures above the valve environmental qualification differential pressure of 45 psid. In addition, based on preliminary discussions with vendors, the licensee believes that the valves will properly operate under the stated worst case conditions (Section 1R22).

- No Color. The inspectors identified that the licensee had failed to obtain NRC approval for a change to the fire protection program that involved reducing the required fire brigade drill periodicity from quarterly to semi-annually. This issue constituted a

violation of License Condition 2.C(14), which permits changes to the fire protection program, without NRC approval, unless a change could adversely affect the ability to achieve and maintain safe shutdown. This Severity Level IV violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy. The problem is in the licensee's corrective action program as Problem Evaluation Request 201-0530.

This issue has no color because the problem is not subject to the fire protection significance determination process but constitutes a violation more than minor significance and has the potential for impacting the NRC's ability to perform its regulatory function (Section 1R05).

Report Details

Summary of Plant Status:

Operators maintained reactor power at essentially 100 percent for the inspection period.

1 REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather (71111.01)

.1 (Closed) Unresolved Item 50-397/00014-01: two problems with heat trace circuits.

The inspectors identified that the licensee had not performed surveillances on safety-related and nonsafety-related heat traces in the Division III standby service water and condensate systems since initial plant startup. During this inspection, the inspectors considered the failure to perform appropriate testing to ensure the operability of the safety-related Division III standby service water heat traces a violation of 10 CFR Part 50, Appendix B, Criterion XI (Test Control). This regulation requires, in part, appropriate operational testing to ensure the operability of safety-related circuits. The inspectors considered no periodic testing inadequate.

The inspectors considered the significance of this violation more than minor because it could have a credible impact on safety. The inspectors used the Phase 1 significance determination process and concluded that the issue had very low risk significance based on the finding affected only the mitigating system cornerstone and was determined not to result in a loss of function per Generic Letter 91-18, Revision 1, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions." Accordingly, this violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy. The problem is in the licensee's corrective action program as Problem Evaluation Request 200-2037 (50-397/01002-01).

In the second instance, the inspectors had identified a potential nonconforming condition involving the heat trace circuits for the piping leg from the condensate storage tank to the high pressure core spray and reactor core isolation cooling systems. Specifically, the licensee classified the heat trace circuits as nonsafety related but the circuits appear to meet the definition of safety related (Safety Class 3) in the Final Safety Analysis Report (Section 3.2). The licensee had no testing or analysis to show that heat trace failure would not affect safety-related system operation. It appears that a frozen line could cause the reactor core isolation cooling pump to trip on low pressure and could additionally cause damage to the high pressure core spray pump. As such, the heat trace circuits are needed to help mitigate the consequences of a design-basis accident, thereby meeting the definition of safety related.

In response to this issue, the licensee performed an operability assessment and determined that the heat trace could perform its function. In addition, the licensee entered the problem into the corrective action program as Problem Evaluation

Request 200-2037 and planned to perform an engineering analysis to determine the proper classification. The inspectors considered the corrective actions acceptable. No enforcement was warranted for the potential nonconforming condition, consistent with Section 8.1.3 of the NRC's Enforcement Manual, as the equipment classification may not have ever matched the description in the Final Safety Analysis Report.

1R04 Equipment Alignments (71111.04)

.1 Partial System Walkdowns

a. Inspection Scope

The inspectors verified partial equipment alignments, for the existing plant conditions, for the following systems while the licensee had the redundant trains out of service.

- Residual heat removal system, Train B
- Division II standby gas treatment system

b. Issues and Findings

No findings of significance were identified.

.2 Complete System Walkdowns

a. Inspection Scope

The inspectors additionally performed a complete system walkdown for the high pressure core spray system, consistent with NRC Inspection Procedure 71111.04, Section 02.02. The inspectors reviewed the following documents as part of this inspection:

- Final Safety Analysis Report
- Drawing M520, "High Pressure Core Spray and Low Pressure Core Spray Systems," Revision 85
- Procedure 2.4.4, "High Pressure Core Spray System," Revision 27
- Listings of outstanding work orders and pending system changes

b. Issues and Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Quarterly Inspection

a. Inspection Scope

The inspectors performed the routine quarterly fire protection inspection. The inspectors observed the functionality and material condition of the fire protection equipment, detection systems, and passive protection features. The inspectors also verified proper controls for combustible materials and ignition sources. The inspectors reviewed the following areas:

- Division I, II and III diesel generator fuel oil rooms
- Division I, II and III diesel generator fuel oil day tank rooms
- Reactor Building 441 foot elevation
- Reactor Building 471 foot elevation
- Reactor Building 501 foot elevation
- Reactor Building 522 foot elevation
- Reactor Building 548 foot elevation
- High pressure core spray pump room

b. Issues and Findings

No findings of significance were identified.

.2 (Closed) Unresolved Item 50-397/00012-02: failure to obtain NRC approval prior to changing fire protection program.

The inspectors had identified a potential problem with fire brigade drill periodicity. In 1996 the licensee modified their Fire Protection Program to change the fire brigade drill periodicity from quarterly to semi-annually. During this inspection period, the inspectors consulted with fire protection experts in the NRC's Office of Nuclear Reactor Regulation and determined that the licensee had violated Columbia Generating Station License Condition 2.C(14), in that they did not seek NRC approval prior to implementing the change.

License Condition 2.C(14) states, in part, "The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire."

Standard Review Plan, Section 9.5.1, Subsection 1 (Defense-in-Depth), which outlines the basis for the NRC position on this issue, states, in part, "With respect to the fire protection program, the defense-in-depth principle is aimed at achieving an adequate balance in: (a) preventing fires from starting; (b) detecting fires quickly, suppressing those fires that occur, putting them out quickly, and limiting their damage; and (3) designing plant safety systems so that a fire that starts in spite of the fire prevention

program and burns for a considerable time in spite of fire protection activities will not prevent essential plant safety functions from being performed.”

Based on the above information, the inspectors concluded that the decreased fire brigade drill periodicity, which had been implemented to fire protection program, could negatively impact the training of the fire brigade and potentially result in the brigade being less effective at fighting fires. For example, fires could burn longer, increasing the risk of fire barrier failure and challenging safe shutdown equipment. Therefore, this change to the fire protection program could adversely affect the ability to achieve and maintain safe shutdown in the event of a fire and prior NRC approval was required. Failure to obtain NRC approval prior to implementing this change constituted a violation of License Condition 2.C(14). This Severity Level IV violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy. The problem is in the licensee's corrective action program as Problem Evaluation Request 201-0530 (50-397/01002-02).

The above violation is not subject to the fire protection significance determination process, as the change does not affect plant equipment. However, consistent with NRC Manual Chapter 0610*, the inspectors determined that extenuating circumstances exist with this issue. Specifically, (1) the violation had more than minor significance, as ineffective fire fighting could adversely affect safety; and (2) the failure to request NRC approval for the Fire Protection Program change had the potential for impacting the NRC's ability to perform its regulatory function.

1R11 Licensed Operator Requalification (71111.11Q)

a. Inspection Scope

The inspectors observed crew training scenarios and critiques on March 14 and 21, 2001, to assess the effectiveness of the licensee's operator requalification program. The inspectors also assessed the ability of operators to respond to events and verified that the licensee configured the simulator consistent with the control room.

b. Issues and Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the following documents associated with equipment failures to assess the effectiveness of the maintenance rule evaluations:

- Problem Evaluation Request 201-0305, Division I emergency diesel generator tripped on low lube oil pressure indication, dated February 28, 2001

- Problem Evaluation Request 201-0293, Air Compressor CAS-C-1A operational problems caused by restriction in oil flow, dated February 26, 2001
- Problem Evaluation Request 201-0335, Inverter IN-2 inadvertently shutdown when contractor slipped, dated March 6, 2001
- Problem Evaluation Request 201-0414, Division II battery charger found out of service - battery had decreasing voltage and was carrying loads, dated March 20, 2001
- Control Room Logs
- Maintenance Rule Program, Revision 3

b. Issues and Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13)

a. Inspection Scope

The inspectors reviewed the following work prioritization, risk evaluation, and work control activities to evaluate the effectiveness of licensee risk management:

- Work on Division I standby liquid control and standby gas treatment systems at the same time.
- Work on the Division I diesel generator and an instrument air compressor at the same time.
- Inverter IN2 work.
- Work with the Division I emergency diesel generator and the reactor core isolation cooling system out of service concurrently.

b. Issues and Findings

No findings of significance were identified.

1R14 Personnel Performance Related to Nonroutine Plant Evolutions and Events (71111.14)

a. Inspection Scope

The inspectors observed the Operations response to a significant packing leak that initiated late March 23, 2001, and continued into the morning of March 24. The leakage exceeded the Technical Specification 3.4.5 limits (greater than 2 gallon per minute increase in unidentified leakage in a 24-hour period and 5 gallon per minute total

unidentified leakage). Operators identified that leakage originated from reactor core isolation cooling system steam Valve RCIC-V-63, inboard RCIC steam supply containment isolation, and back seated the valve to isolate the leak. Operators declared Valve RCIC-V-63 inoperable and closed Valve RCIC-V-8, outboard RCIC steam supply containment isolation, to isolate the penetration, as required by the Technical Specifications. Operators subsequently declared the reactor core isolation cooling system inoperable. Unidentified leakage peaked at approximately 5.7 gallons per minute and the event lasted slightly more than 4 hours.

b. Issues and Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following operability evaluations. The inspectors checked that the licensee properly justified operability and that other components/systems remained available such that no unrecognized increase in risk had occurred:

- Problem Evaluation Request 200-2037, potentially nonconforming heat trace circuits
- Problem Evaluation Request 200-2111, potential cladding deterioration from noble injection
- Problem Evaluation Request 201-0305, emergency diesel generator tripped on low lube oil pressure

b. Issues and Findings

No findings of significance were identified.

1R16 Operator Workarounds (71111.16)

a. Inspection Scope

The inspectors reviewed the licensee's list of operator burdens and compared this list to a separate independent list of operator workarounds kept by the inspectors. The inspectors evaluated whether the licensee kept abreast of all significant equipment problems. Further, the inspectors assessed the cumulative effects of the workarounds on the plant equipment.

b. Issues and Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors evaluated postmaintenance testing for the following activities to determine whether the tests confirmed equipment operability:

- Division III emergency diesel generator output Breaker E-CB-4/DG3 spring charging motor modification
- High pressure core spray pump Breaker HPCS-CB-P/1 spring charging motor modification
- High pressure core spray system keepfill pump maintenance

Documents reviewed during this inspection included:

- Work Order 0109896, Division III diesel generator output breaker and high pressure core spray pump breaker modifications
- Procedure OSP-ELEC-M703, "HPCS [High Pressure Core Spray System] Diesel Generator Monthly Operability Test," Revision 12
- Procedure OSP-HPCS/IST-Q701, "HPCS System Operability Test," Revision 11
- Procedure OSP-HPCS-M101, "HPCS Fill Verification," Revision 0
- Work Order 00MCZ0, high pressure core spray keepfill pump maintenance and postmaintenance testing

b. Issues and Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the surveillances listed below to verify that the testing demonstrated system/component capability:

- Test Report 2-59700/IR-52972, "Qualification Testing for Containment Exhaust Purge Valves CEP-V-1A, 2A, 3A and 4A."
- Procedure TSP-RB-B501, "Reactor Building (Secondary Containment) Drawdown/Leakage Functional Test," Revision 3

- Procedure OSP-RCIC/IST-Q702, "RCIC [Reactor Core Isolation Cooling] Valve Operability Test," Revision 9

The inspectors reviewed the following additional documents as part of this inspection:

- NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," August, 1982
- Problem Evaluation Request 201-0248, inadequate validation and verification of primary containment emergency operating procedure, dated February 13, 2001
- Calculation NE-02-97-16, Attachment 9, "Primary Containment Pressure Limits," dated December 15, 1997
- Calculation ME-02-91-77, "Calculation Evaluating the Primary Containment Response During a Severe Accident Condition," dated September 30, 1991
- Procedure 2.3.1, "Primary Containment Venting, Purging, and Inerting," Revision 38
- Procedure 5.5.14, "Emergency Wetwell Venting," Revision 5
- Procedure 5.5.15, "Emergency Drywell Venting," Revision 4

b. Issues and Findings

The inspectors identified that engineering had not properly verified and validated Emergency Operating Procedure 5.2.1, "Containment Pressure Control," Step P-14 for venting the containment. Specifically, the licensee had no documented testing or analysis that demonstrated the containment exhaust and purge Valves CEP-V-1A, 2A, 3A and 4A could open with containment pressure approaching 92 psig. The licensee upgraded the valves in 1996 and verification and validation should have occurred at that time. As part of environmental qualification, the licensee verified that the valves could operate at 45 psid differential pressure.

NOTE: NUREG 0899, Step 3.3.5 recommends validation/verification of the Emergency Operating Procedures. Step 4.3 recommends documentation of Technical Guideline information (that would include design limits) and Step 4.4 recommends controlling this information consistent with the Quality Assurance program. In addition, "General Electric Emergency Procedures Guideline," Step PC/P-4 indicates that licensees should consider the maximum primary containment pressure at which the containment vent valves can be opened and closed.

The inspectors determined that the issue was of more than minor significance because the issue has a credible impact on safety. The inspectors utilized the significance determination process and insights from the licensee's probabilistic risk assessment to determine that the issue had very low risk significance. This determination was based on the very low core damage and large early release frequencies associated with the

event sequences, where the valves would be utilized, with elevated containment pressures above the valve qualification differential pressure of 45 psid.

The licensee has indicated that based on preliminary discussions with the respective vendors, the valves will properly operate under the stated worst case conditions. The problem is in the licensee's corrective action program as Problem Evaluation Request 201-0248.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed the following plant temporary modifications with respect to design bases documentation, approvals, and tracking. The inspectors also walked down the modifications to inspect the configuration and tagging.

- Temporary Modification Request TMR00-013 (2000-0013) - this temporary modification installed a welded pipe cap to the stuffing box and removed the disk position switches to Feedwater Valve FW-V-32A, feedwater injection check valve and containment isolation valve, to stop a packing leak.
- Temporary Modification Request TMR00-0014 (2000-0014) - this temporary modification seal welded Valve MS-V-105B (reactor feedwater turbine B steam supply valve) mechanical joints to stop a steam leak.

The inspectors reviewed the following additional documents during this inspection:

- Final Safety Analysis Report
- Improved Technical Specifications
- Generic Letter No. 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," Revision 1

b. Issues and Findings

No findings of significance were identified.

1R51 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors independently calculated the following performance indicator data by reviewing operator logs, equipment out-of-service logs and corrective action program records:

- High pressure core spray system unavailability
- Emergency power unavailability

The inspectors compared their calculated results to the plant data to ensure that the submitted information was accurate.

b. Issues and Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA3 Event Followup (71153)

- .1 (Closed) Licensee Event Report 50-397/00-008: unexpected low pressure in the containment instrument air system results in actuation of safety-related bottled nitrogen source to maintain operating pressure for the automatic depressurization system.

The inspectors considered the event of minor significance. The licensee performed a root cause analysis and documented this event in Problem Evaluation Request 200-2145.

- .2 (Closed) Licensee Event Report 50-397/00-007: reactor scram because of loss of condenser vacuum.

The inspectors previously covered this issue in NRC Inspection Report 50-397/00-13, Section 1R14. This item is closed based on that inspection. The licensee performed a root cause analysis and documented this event in Significant Problem Evaluation Request 200-1611.

4OA5 Other

(Closed) Violation 50-397/99013-01: inadequate corrective actions to address reactor core isolation cooling system unreviewed safety question.

In response to a previous violation where the licensee inappropriately downgraded the reactor core isolation cooling system to nonsafety status, the inspectors found that the licensee, when upgrading the system, failed to provide reasonable justification for the continued nonsafety status of the keepfill pump and the barometric condenser level switch. In response to the subsequent violation, the licensee upgraded the keepfill pump to safety-related status and provided a more appropriate and detailed analysis justifying the nonsafety status of the level switch. The inspector considered the licensee's corrective actions appropriate to the circumstances.

4OA6 Management Meetings

Exit Meeting Summary

The senior resident inspector presented the inspection results to Mr. J. Parrish, Chief Executive Officer, and other members of licensee management on April 10, 2001. The licensee acknowledged the inspection results during the meeting. Following the meeting, the inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT

Supplemental Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee

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W. Oxenford, Plant General Manager
D. Poirier, Maintenance Manager
G. Smith, Vice President - Generation
R. Webring, Vice President - Operation Support

ITEMS OPENED AND CLOSED

Items Opened, Closed, and Discussed During this Inspection

Opened

None

Opened and Closed During this Inspection

50-397/01002-01	NCV	Inadequate heat trace testing (Section 1R01)
50-397/01002-02	NCV	Failure to obtain NRC approval for fire protection program change (Section 1R05)

Previous Items Closed

50-397/99013-01	VIO	Inadequate corrective actions to address unreviewed safety question (Section 4OA5)
50-397/00012-01	URI	Failure to obtain NRC approval for fire protection program change (Section 1R05)
50-397/00014-01	URI	Potential heat trace problems (Section 1R01)
50-397/2000-007	LER	Manual scram due to loss of condenser vacuum (Section 4OA3)
50-397/2000-008	LER	Unexpected low pressure in the containment instrument air system results in actuation of safety-related nitrogen bottles to maintain automatic depressurization system operable (Section 4OA3)

Previous Items Discussed

None