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SDP/EA REQUEST & STRATEGY FORM

Case Data		Disputed: <input type="checkbox"/>	Related Cases: <input type="checkbox"/>
EA- 02-031	Number: 1	Docket No.: 50-266, 50-301	
Request Date: 02/21/02	Region: III	Case Type: Reactor	Small Entity: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Licensee: Nuclear Management Company	Facility / City: Point Beach		
License No.: DPR-24, DPR-27	Last Day of Insp.: 12/13/01		
Insp. Rpt No.: 2001-17	Keywords: 010143, 010201	ES: mcn	
Facts (EATS): Apparent violations of Criterion V & XVI associated with a Red finding for common mode failure of AFW.			

Discussion (if required):

SDP		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
Assessment: <input type="checkbox"/> Green <input type="checkbox"/> White <input type="checkbox"/> Yellow <input checked="" type="checkbox"/> Red	NOV	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Wrongdoing <input type="checkbox"/> No <input type="checkbox"/> Yes		
OI Ref Date: <input type="checkbox"/>	OI Rpt. No.: <input type="checkbox"/>	OI Rpt Date: <input type="checkbox"/>
DOJ Referral? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	Ref. Date: <input type="checkbox"/>	Action Date: <input type="checkbox"/> Decline <input type="checkbox"/> Accept
Additional OI Status: <input type="checkbox"/> OI Investigating <input type="checkbox"/> OI needs to be notified <input type="checkbox"/> OI/OE dispute memo needed	<input type="checkbox"/> Additional coordination needed <input type="checkbox"/> Awaiting DOJ <input type="checkbox"/> Needs coordination with DOJ	
Escalated Action		
Consequence: <input type="checkbox"/> Actual <input type="checkbox"/> Potential <input type="checkbox"/> Reg Impact <input type="checkbox"/> Willfulness		
Prior Esc. Action? <input type="checkbox"/> No <input type="checkbox"/> Yes	EA: <input type="checkbox"/>	Date: <input type="checkbox"/>
ID Credit? <input type="checkbox"/> No <input type="checkbox"/> Yes	TBD	SL: <input type="checkbox"/>
CA Credit? <input type="checkbox"/> No <input type="checkbox"/> Yes	TBD	Supp: <input type="checkbox"/>
CP? <input type="checkbox"/> No CP <input type="checkbox"/> Base <input type="checkbox"/> Double Base <input type="checkbox"/> Other: <input type="checkbox"/>		
Discretion or Order? <input type="checkbox"/> No <input type="checkbox"/> Yes Explain		
Future Action		
Conference? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed	Additional: <input type="checkbox"/>	
Action? <input type="checkbox"/> No Violation <input type="checkbox"/> Re-panel <input type="checkbox"/> PEC Letter <input checked="" type="checkbox"/> Choice Letter <input type="checkbox"/> Choice Call <input type="checkbox"/> SL IV NOV <input type="checkbox"/> Re-caucus	<input type="checkbox"/> Region Issue Esc. Action <input type="checkbox"/> Full Package Review by HQ <input type="checkbox"/> DEDR Review <input type="checkbox"/> Commission <input type="checkbox"/> Disagreement <input type="checkbox"/> NCV	
Other Action? <input type="checkbox"/>		

Participants: Region J Caldwell, J Grobe, G Grant, R Caniano, R Lanksbury, R Langstaff, S Burgess, M Parker, K Lambert
 OE J Luehman, C. Nolan, M Shannon OGC/OI
 Program Office R. Barrett, M. Johnson, D. Coe, S. Lee, R. Mathews, M. Sally, J Houghton
 E. Weiss, M. Franovich Other

Remarks/Comments/Lessons Learned. The design of the AFW system at Point Beach is for the recirculation valves to fail shut on a loss of instrument air (IA). The design basis credits the flow path to the steam generators as a means for providing minimum flow to the pumps. During normal operation, the recirculation valves open in a low flow condition and shut as flow through the pumps increases. This is an NSR function that relies on NSR grade IA. The licensee's EOP for AFW instructs operators to throttle flow to the steam generators (SGs) to zero to prevent over feeding the SG or over cooling the RCS. This defeats the design basis of the AFW system on a LOIA as the pumps could be subjected to a common mode failure as flow drops below the minimum value. This was evaluated as a potential Red finding as the LOIA effected both AFW and the PORVs. The staff identified a violation of 10 CFR 50, Appendix B, Criterion V, Procedures, for the failure to instruct operators of the importance of maintaining some minimum flow in a LOIA event. An apparent violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, was also identified for missed opportunities to identify this issue and inadequate corrective action when the procedure was eventually changed.

Approved, Dir. OE: /RAIJGL
 Date: 02/26/02

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