

March 22, 2004

RAM Item No. - NCV-01

Closed: Y

Description of Issue - Failure to have procedural guidance to control the construction of scaffolding in a manner that would assure proper operation of ventilation of safety equipment. During a run of EDG 2, scaffolding restricted air circulation and produced a high temperature condition on the EDG.

Description of Resolution - This issue was identified and resolved in NRC Inspection Report No. 2002-010. Due to plant conditions at the time, no fuel in the reactor pressure vessel and no fuel movement in progress, the inspectors concluded that the finding was a Non-SDP green finding consistent with guidance in Inspection Manual Chapter 0612, "Power Reactor Inspection Reports." This issue was placed in the licensee corrective action program as Condition Report CR 02-03570. The completed corrective action associated with this issue was a change request to procedure DB-MS-01637, "Scaffolding Erection and Removal," to ensure consideration of the impact of scaffolding erection on ventilation system heat removal capability.

Reference Material - Licensee Condition Report No. 02-03570 and NRC Inspection Report No. 2002-010, which is in ADAMS at accession no. ml023030585.

March 22, 2004

RAM Item No. - NCV-02

Closed: Y

Description of Issue - Failure to provide acceptance criteria or requirements to follow inspection plans used for the extent of condition inspections of systems in containment.

Description of Resolution - As a corrective action for this issue, the licensee issued three procedures (EN-DP-01500, "Reactor Vessel Inspection Procedure;" EN-DP-01501, "Inspection of RCS Alloy 600 Components/Welds, Threaded/Bolted Connections and Targets;" and EN-DP 01502, "Containment Area Inspections") to control the inspection activities inside containment. These procedures contained appropriate instructions and acceptance criteria, and were classified as safety-related. These procedures contained requirements to confirm visual quality requirements during the inspection (e.g., discern lower case letters of 0.158 inches in height printed on a visual acuity "VT-2" card at six feet under a minimum of 15 foot candles of illumination). The licensee inspectors identified new areas of corrosion/boric acid deposits on components during inspections using these procedures, which had not been previously identified. This indicated a more thorough licensee inspection effort for SSCs under the DBCHAP than that previously completed under the "Containment Boric Acid Extent of Condition Plan." The boric acid or corrosion deposits observed on components by the NRC inspectors within containment (including the reactor vessel) had, in each case, been identified and documented by the licensee staff during these inspections. Therefore, the NRC inspectors concluded that the licensee had taken effective corrective actions to address the lack of inspection quality and thoroughness associated with implementation of the original licensee plans to inspect SSCs within containment.

Reference Material - DRS Inspection Report No. 50-346/02-12 (ADAMS Accession No. ml023370132).

March 22, 2004

RAM Item No. - NCV-03

Closed: Y

Description of Issue - Failure to adequately train personnel for VT-2 certification to perform containment area extent of condition walkdowns.

Description of Resolution - As a corrective action for this issue, the licensee developed a new standard to qualify/certify personnel as "Boric Acid Corrosion Control Inspectors." This new standard required 60 hours of relevant work experience. The NRC inspectors reviewed licensee certification packages for 14 certified Boric Acid Corrosion Control Inspectors and noted that these personnel typically had extensive experience and/or previous training/certification in several nondestructive examination methods. The licensee trained and certified over 20 contract personnel to augment existing staff members in performing these inspections. The NRC inspectors observed the classroom training and reviewed written examinations administered to the licensee contract inspectors. The training scope and depth was more extensive than that used in the original VT-2 Certification Process. Licensee staff had to pass a General and Specific written examination intended to meet qualification requirements for an ASME Code VT-2 visual examination. Additionally, licensee staff were given in-depth training and tested on the procedural requirements and expectations for the conduct of the boric acid/corrosion inspections. Further, licensee staff had to pass a practical examination on actual areas/components in containment. This practical examination included a standardized checklist of criteria which needed to be demonstrated by the student for a passing grade. Twenty-two licensee staff initially failed certification tests, which indicated that this series of certification tests was challenging. Most of these personnel were provided additional training and satisfactorily completed the certification process. The certification for each individual was recorded in a Job Familiarization Guideline that had specific requirements for each type of inspector (mechanical, structural, electrical) and was unique to each procedure used for conducting inspection of components for boric acid/corrosion. The NRC inspectors concluded that the licensee had developed a well defined training standard with appropriate training and testing for the Boric Acid Corrosion Control Inspectors who conducted inspections of SSCs within containment. This corrective action adequately addressed the previous NRC finding associated with inadequate training of licensee support personnel for this activity.

Reference Material - DRS Inspection Report No. 50-346/02-12 (ADAMS Accession No. ml023370132).

RAM Item No. - NCV-04

Closed: Y

Description of Issue - Failure to placard vehicles used to transport radioactive materials.

Description of Resolution - The panel reviewed this NCV and determined that no added followup was needed. The issue was in the licensee's corrective action program and was being addressed commensurate with its safety risk. This item is closed.

Reference Material - None.

March 22, 2004

RAM Item No. - NCV-05

Closed: Y

Description of Issue - Failure to conduct adequate surveys of workers prior to leaving the site.

Description of Resolution - This related to inadequacies in the radiation protection program that allowed individuals to leave the site with radiological contamination present on the individuals. As a result of this and the two white findings identified in other inspections, a supplemental team inspection was conducted in accordance with Inspection Procedure 95002, "Inspection For One Degraded Cornerstone or Any Three White Inputs In a Strategic Performance Area." In addition, relevant sections of Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input" were used as guidance during this inspection. The purpose of the supplemental inspection was to: (1) provide assurance that the root and contributing causes for the collective performance which resulted in the degraded cornerstone were understood; (2) independently assess the extent of condition and generic implications of these performance issues; and (3) provide assurance that the corrective actions were sufficient to prevent recurrence. The team concluded that the licensee's corrective action plans were adequate to address the root and contributing causes that were identified in the licensee's root cause evaluation so as to prevent recurrence. Additionally, the team determined that significant progress had been made to improve the licensee's radiation protection program. The team did not identify any significant concerns associated with the current radiation protection program's effectiveness, or significant problems related to the licensee's root cause evaluations for the radiation protection performance problems.

Reference Material - DRS Inspection Report No. 50-346/03-08 (ADAMS Accession No. ml031500693).

March 22, 2004

RAM Item No. - NCV-6

Closed: Y

Description of Issue - In 2002, SSDI team identified NCV-6 for failing to correctly translate the design basis requirements for sizing of the safety-related backup air supplies for containment isolation valves SW-1356, SW-1357, and SW-1358 into the design. The licensee's corrective action was to install new accumulators sized to hold the valves closed.

Description of Resolution - The team reviewed several revisions of calculation C-ME-011.06-007 which sized the new accumulators. The team identified errors in the calculation which required the calculation to be revised. For example, in Revisions 0 and 1 of the calculation, the new accumulators were intended to be filled with air as the licensee thought the valves only had to remain closed for 30 minutes. The licensee initially did not recognize that the valves had a containment isolation design function which required the valves to remain closed for 30 days.

Following the team's questions, the licensee changed the design to require that the new accumulators be filled with nitrogen rather than air. In the last revision reviewed, the calculation erroneously used the ideal gas law equations when sizing the nitrogen bottles without consideration of the compressibility of nitrogen at a pressure of 2000 psig. Additional examples of lack of rigor and inadequate assumptions were identified. The licensee revised the calculation to correct the errors identified by the team. This item is resolved.

A NCV of 10 CFR Part 50, Appendix B, Criterion III, having very low safety significance (Green) was issued in NRC Inspection Report 05000346/2003010.

Reference Material - NRC Inspection Report 05000346/2003010, Sections 4OA3(3)b.4 (ADAMS Accession No. ml040680070) and NCV 05000346/2002014-01a.

RAM Item No. - NCV-7

Closed: Y

Description of Issue - NCV-7 was issued by the NRC during the 2002 SSDI to document that there were no provisions to blow down the SW containment isolation valve accumulators although USAR Section 9.3.1.5 stated that the accumulators contained a provision to allow removal of excessive moisture.

Description of Resolution - The team determined that, due to the change in accumulator medium from air to nitrogen, that there was no longer any need for blowdown provisions.

Reference Material - NRC Inspection Report 05000346/2003010, Sections 4OA3(3)b.5 (ADAMS Accession No. ml040680070) and NCV 05000346/2002014-01b.

March 22, 2004

RAM Item No. - NCV-08

Closed: Y

Description of Issue - The licensee initiated CR 02-07766 to address the issue that the trip set point specified in calculation C-EE-004.01-049 was greater than the TS allowable value. Therefore, the postulated TS allowable value could be violated for plant operating conditions where the voltage was just above the relay set point value.

Description of Resolution - The team reviewed the issue and determined that the new calculation, C-EE-015.03-008, which utilized the ETAP program, properly addressed all issues included in the CR. Therefore, the corrective actions to this issue were deemed acceptable, and this item is resolved.

Reference Material - NRC Inspection Report 05000346/2003010 (ADAMS Accession No. ml040680070) and URI 05000346/2002014-01i.

RAM Item No. - NCV-9 and URI-21

Closed: Y

Description of Issue - NCV-9 dealt with non-Conservative Relay Setpoint Calculation for the 59 Percent Undervoltage Relay.

URI-21 concerned the use of insufficiently supported uncertainty values in the calculation for the 90 percent Undervoltage Relays.

Description of Resolution - These two items were examined together during the CATI. The licensee performed additional analysis to assess the impact of using insufficiently supported uncertainty values.

The design remained adequate and there was no violation identified. URI-21 which was closed in NRC Inspection Report 05000346/2003010.

The NRC reviewed ETAP calculation C-EE-015.03-008, Revision 2. The calculation properly addressed the postulated inconsistencies and non-conservative assumptions in the uncertainty analysis. Therefore, the corrective actions to NCV 9 were evaluated as acceptable.

Reference Material - NRC Inspection Report 05000346/2003010, Sections 4OA3(2)b.7 and 4OA5(1)b.2.11 (ADAMS Accession No. ml040680070) and URI 05000346/2002014-01j and 01k.

March 22, 2004

RAM Item No. - NCV-10

Closed: Y

Description of Issue - An NCV in IR 05000346/2002014 was issued during SSDI because there was no analytical basis for setpoint to swap service water system discharge path. The corrective actions taken by the licensee failed to correct the originally identified condition.

Description of Resolution - During the CATI, the team reviewed the evaluation and corrective actions taken for this NCV. The team identified a number of errors and issues with the analyses performed by the licensee. The team determined that the revised evaluation did not address the violation.

The licensee implemented compensatory measure to ensure that the service water supplied to the safety related loads is not compromised. The NRC staff concludes that this action is sufficient for restart.

A violation of 10 CFR Part 50, Appendix B, Criterion III, was issued in NRC Inspection Report 05000346/2003010 since the licensee had not corrected a previous violation and was relying on non-safety-related equipment to perform a safety function under design bases conditions.

Reference Material - NRC Inspection Report 05000346/2003010, Section 4OA3(3)b.11 (ADAMS Accession No. ml040680070) and NCV 05000346/2002014-01v.

RAM Item No. - NCV-11

Closed: Y

Description of Issue - NCV-11 addressed the fact that a surveillance test did not demonstrate that worst-case post-accident conditions were bounded for the CAC discharge valves in the SW system.

Description of Resolution - The licensee was replacing these valves, due to a number of problems with them. The proposed corrective actions appeared to include appropriate acceptance criteria. The team identified a concern with the original evaluation and corrective action wording in CR 02-07781. The licensee's procedure did not declare the valves inoperable and write a CR if the valves failed the valve closure test. This issue was not originally addressed in the licensee's corrective actions. However, when it was brought to the licensee's attention, appropriate changes were made in the procedure to address declaring the valve inoperable and writing CRs when necessary. This item is adequately resolved.

Reference Material - NRC Inspection Report 05000346/2003010 (ADAMS Accession No. ml040680070) and URI 05000346/2002014-02a.

March 22, 2004

RAM Item No. - NCV-12

Closed: Y

Description of Issue - The 2002 SSDI identified a Green finding and NCV of 10 CFR Part 50, Appendix B, regarding the licensee's failure to adequately correct the SW pump discharge check valve acceptance criteria in the test procedure.

Description of Resolution -The original concern that resulted in the NCV was that the test procedure acceptance criteria reflected 10,000 gpm flow when the USAR reflected system performance flow of 10,250 gpm. This concern was entered into the licensee's corrective action system as CR 02-07657. The team determined that this CR was closed based on a non-documented calculation which showed that the valves would be wide open at flow rates greater than 7270 gpm. The inspectors reviewed the NCV and identified two issues. First, the test acceptance criteria of the procedure still did not match the value contained in the USAR. The second issue related to the licensee utilizing a non-documented calculation to justify not meeting the check valve acceptance criteria when the system was tested.

Regarding the first issue, the inspectors concluded that a violation of 10 CFR Part 50, Appendix B existed because of the inadequate acceptance criteria. The inspectors concluded that the minor discrepancy between the USAR value and the acceptance criteria was of very low safety significance and not a concern for restart.

Regarding the second issue, the inspector noted that a test of the system resulted in a flow rate of 9,718 gpm. The inspectors concluded that given the flow rate developed and the pressure achieved, there was reasonable assurance that the check valve was full open at the obtained flow rate of 9,718 gpm. The licensee developed an operability evaluation regarding the discrepancies in the service water system. That operability evaluation was reviewed by the resident inspection staff and documented in Inspection Report No. 50-346/03-25. Consequently, the inspectors concluded that the NCV was not a concern for restart.

Reference Material - NRC Inspection Report No. 50-346/03-10 (ADAMS Accession No. ml040680070) and 50-346/03-25 (ADAMS Accession No. ml040290768).

March 22, 2004

RAM Item No. - NCV-13

Closed: Y

Description of Issue - The licensee failed to perform a surveillance in accordance with TS 4.5.2.H for HPI pump following maintenance.

Description of Resolution - The licensee requested a TS amendment (No. 256) to relocate the surveillance requirement pertaining to flow balance testing of the HPI and LPI subsystems following system modifications to the technical requirement manual. The amendment added ECCS pump operability conditions to the TS. The new surveillance requirement would require verifying each ECCS pump's developed head to be greater than or equal to the required developed head, when tested pursuant to TS 4.0.5 with regards to inservice testing requirements of the ASME Code. The team had no further concerns, did not identify other new issues, and has evaluated this item is resolved.

Reference Material - NRC Inspection Report 05000346/2003010 (ADAMS Accession No. ml040680070) and URI 05000346/2002014-04.

March 22, 2004

RAM Item No. - NCV-14

Closed: Y

Description of Issue - As documented in Inspection Report 05000346/2003004, an NCV was issued for the failure to properly control the installation of a Poly-vinyl Chloride (PVC) jumper located in their service water system in accordance with the requirements of their "Control of Temporary Modifications" procedure. The failure of this jumper during a flushing evolution resulted in approximately 3000-4000 gallons of service water being spilled into containment.

Description of Resolution - The performance deficiency associated with this event was the failure to implement procedures appropriate to the circumstances. By not implementing the Control of Temporary Modifications procedure, inadequate controls were in place to control the fabrication and installation of a PVC jumper in the service water system. The inspectors reviewed the corrective actions associated with condition report (CR) 03-01888, "Service Water to Containment Air Cooler PVC Piping Break During Service Water Flush." The inspectors determined that a majority of the corrective actions associated with this CR had been implemented and appropriately addressed the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective actions and determined the due dates assigned to these actions were appropriate. This NCV was closed in Inspection Report 05000346/2003022.

Reference Material - None.

March 22, 2004

RAM Item No. - NCV-15

Closed: Y

Description of Issue - Failure to properly control access to locked high radiation areas (LHRAs) as required by Technical Specifications.

Description of Resolution - The panel determined that no additional follow-up was necessary. The licensee had promptly corrected the problem once it had been identified by the NRC inspector and the problem had been entered into the licensee's corrective action system to ensure corrective actions would prevent recurrence. The panel considers this item closed.

Reference Material - DRS Inspection Report No. 50-346/03-08 (ADAMS Accession No. ml031500693).

RAM Item No. - NCV-16

Closed: Y

Description of Issue - Failure to Respond to Dosimeter Alarms.

Description of Resolution - The panel determined that no additional follow-up was necessary. The licensee had entered the problem into the licensee's corrective action system to ensure corrective actions would be implemented that would prevent recurrence. The panel considers this item closed.

Reference Material - None.

March 22, 2004

RAM Item No. - NCV-17

Closed: Y

Description of Issue - Failure to adequately verify the accuracy of ECCS design calculations. Specifically, the NRC inspectors identified that net positive suction head (NPSH) calculations for the low pressure injection (LPI) and containment spray (CS) pumps did not adequately address the head loss through several system piping fittings and used a potentially non-conservative value for minimum containment water level. Calculation C-NSA-059.01-019 used an incorrect water volume for the core flood tank water volume when determining the minimum containment water level, and calculation C-NSA-049.02-26 failed to incorporate correct head loss terms for several components when determining the available NPSH for the LPI and CS pumps. In addition, the NRC inspectors identified that the licensee had removed, during a sump design modification, anti-vortex cruciforms from the ECCS emergency sump suction inlet which increased head loss.

Description of Resolution - The performance deficiency associated with this event was the failure to adequately verify the accuracy of ECCS design calculations. The inspectors performed a technical review of revised calculations C-NSA-049.02-26, "NPSH Licensing Basis Analysis for Davis-Besse LPI and CS Pumps," and C-NSA-059.01-019, "Water Level Inside Containment Post LOCA." The inspectors concluded that the licensee's re-evaluation of LPI and CS system NPSH margin during alignment to the emergency sump appropriately addressed and resolved the technical concerns. Additionally, the licensee revised Engineering Change Request 02-0512-00, "Replace Containment Emergency Sump Strainer," to install rounded inlet flanges on each ECCS sump suction inlet to reduce system head loss.

Reference Material - NRC Inspection Report Nos. 50-346/03-006 (ADAMS Accession No. ml031710897) and 50-346/03-017 (ADAMS Accession No. ml032721592).

RAM Item No. - NCV-18

Closed: Y

Description of Issue - Failure to Properly Implement Work Instructions During the Reinstallation of Electrical Conduit and the Electrical Termination of Operating Power and Indication Power to RC4608A and RC4608B (loop 1 reactor coolant system high point vent valves). Closed in same report.

Description of Resolution - The performance deficiency associated with this event was the failure to correctly implement procedures which directed maintenance activities which removed/installed electrical power to safety related equipment. The inspectors reviewed the corrective actions implemented associated with condition report (CR) 03-03427, "RC4608A and RC4608B Are Not Wired Properly." The inspectors determined that the corrective actions associated with this CR had been implemented and appropriately addressed the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective action and determined the due date assigned to this action was appropriate.

Reference Material - CR 03-03427, "RC4608A and RC4608B Are Not Wired Properly."

March 22, 2004

RAM Item No. - NCV-19

Closed: Y

Description of Issue - Inadequately Implementation procedure NS-MD-01023 (Material Engineering Evaluation) During the Procurement Efforts for Replacement SFAS relays. Closed in same report.

Description of Resolution - The performance deficiency associated with this event is the failure to adequately implement procedures required for performing equivalency evaluations for components being replaced in safety related equipment. The inspectors reviewed the corrective actions associated with condition report (CR) 03-03232, "Inadequate Approval of Replacement SFAS [safety features actuation system] Output Relays: Deutsch 4CP36AF." This CR was classified by the licensee as a Significant Condition Adverse to Quality. The inspectors reviewed the assigned corrective actions associated with this CR and determined that the corrective actions were adequate to address the performance deficiency. The inspectors determined that several of the corrective actions associated with this CR had been implemented and that the due dates assigned to the outstanding corrective actions were appropriate. This NCV was closed in Inspection Report 05000346/2003022.

Reference Material - None.

RAM Item No. - NCV-20

Closed: Y

Description of Issue - Inadvertent Operation of DH7A and DH7B Caused By Inadequate SFAS Component Testing Procedure. Closed in same report.

Description of Resolution - The performance deficiency associated with this event was the failure to develop adequate procedures for testing SFAS components. The inspectors reviewed the corrective actions associated with condition reports (CR) 03-02554, "DH7B Opened Unexpectedly," and CR 03-02571, "DH7A Opened After Testing Was Complete." The inspectors determined that the corrective actions associated with these condition reports had been implemented and appropriately addressed the causes of the performance deficiency.

Reference Material - CR 03-02554, "DH7B Opened Unexpectedly," and CR 03-02571, "DH7A Opened After Testing Was Complete."

March 22, 2004

RAM Item No. - NCV-21

Closed: Y

Description of Issue - Failure to Provide Adequate Procedural Guidance for Tightening Fasteners Internal to the High Pressure Injection Pump.

Description of Resolution - The performance deficiency associated with this event was the failure to provide adequate procedural guidance in a safety-related maintenance procedure which provides guidance for tightening fasteners internal to the high pressure injection pump. The inspectors reviewed the corrective actions associated with CR 03-04278, "Broken Bolting Found in High Pressure Injection Pump #1." The inspectors determined that the corrective actions associated with this CR had been implemented and appropriately addressed the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective actions and determined the due dates assigned to these actions were appropriate.

Reference Material - CR 03-04278, "Broken Bolting Found in High Pressure Injection Pump #1."

RAM Item No. - NCV-22

Closed: Y

Description of Issue - Failure to Perform Work in Accordance With Approved Maintenance Procedures During the Installation of Reactor Coolant Pump Mechanical Seal RTDs.

Description of Resolution - The performance deficiency associated with this issue was the failure to perform work in accordance with approved maintenance procedures. The inspectors reviewed the corrective actions associated with CR 03-04773, "RCP/RTD Installation Not In Accordance With Vendor Manual." This CR was classified by the licensee as a Significant Condition Adverse to Quality. The inspectors determined that a majority of the corrective actions associated with this CR had been implemented and appropriately addressed the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective actions and determined the due dates assigned to these actions were appropriate.

Reference Material - CR 03-04773, "RCP/RTD Installation Not In Accordance With Vendor Manual."

March 22, 2004

RAM Item No. - NCV-23

Closed: Y

Description of Issue - Failure to Properly Implement System Procedures During the Filling of the Circulating Water System.

Description of Resolution - The performance deficiency associated with this event was the failure to correctly implement procedures required for plant operation. The inspectors reviewed the corrective actions associated with condition report (CR) 03-03815, "West Pit Flooding." The inspectors determined that the corrective actions associated with this CR appropriately addressed the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective actions and determined the due dates assigned to these actions were appropriate. This NCV was closed in Inspection Report 05000346/2003022.

Reference Material - None.

RAM Item No. - NCV-24

Closed: Y

Description of Issue - As documented in Inspection Report 05000346/2003017, an NCV was issued when it was discovered that the plant had operated in Mode 1 and Mode 2 in excess of the allowed outage time, with two hydrogen analyzers inoperable. The cause of the inoperability was that the component cooling water (CCW) isolation valves on the inlet and outlet to the heat exchangers located in each of the two Containment Gas Analyzers Systems (CGAS) were found stuck shut. This condition rendered the CGAS incapable of performing its design function.

Description of Resolution - The performance deficiency associated with this event was the failure of the licensee to establish an appropriate operational test, for a time period to include original plant startup (1977) until May 2003, to ensure that sufficient cooling water flow would be provided to the hydrogen analyzer heat exchangers during operational Modes that required the hydrogen analyzers to be operable. The inspectors reviewed the corrective actions associated with condition report (CR) 03-03398, "Containment Gas Analyzer CCW Deficiencies." This CR was classified by the licensee as a Significant Condition Adverse to Quality. The inspectors determined that a majority of the corrective actions associated with this CR had been implemented and appropriately addressed the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective actions and determined the due dates assigned to these actions were appropriate. This NCV was closed in Inspection Report 05000346/2003022.

Reference Material - None.

March 22, 2004

RAM Item No. - NCV-25

Closed: Y

Description of Issue - Technical Specification 3.5.2 - Inadequate Final Containment Inspection.

Description of Resolution - The performance deficiency associated with this issue was the failure to adequately identify and remove loose debris from the containment building prior to determining that containment was ready to support plant operation in Mode 3. The inspectors reviewed the immediate corrective actions taken by the licensee to remove the material and found them to be adequate. The inspectors also reviewed a new procedure, DB-OP-03013, "Containment Daily Inspections and Containment Closeout Inspection," Revision 00. This procedure was developed to, in part, provide guidance for the conduct of containment closeout inspections. The inspectors determined that, if implemented correctly, the procedure should significantly improve the thoroughness of inspections required to identify loose material in containment.

Reference Material - NRC Inspection Report No. 50-346/2003-018 (ADAMS Accession No. ml033080433).

RAM Item No. - NCV-26

Closed: Y

Description of Issue - Procedure for Testing the Response Time of the Auxiliary Feedwater Pump 1 Turbine Did Not Adequately Describe the Acceptance Criteria for Successful Completion of the Test.

Description of Resolution - The performance deficiency associated with this issue was the failure to incorporate the proper acceptance criteria into a procedure that is used to determine the operability of a safety related component. The inspectors reviewed the revisions to surveillance procedures DB-SP-03157, "AFP 1 Response Time Test," Revision 6, and DB-SP-03166, "AFP 2 Response Time Test," Revision 05. These procedure revisions provided clear guidance on the required pump performance to demonstrate operability.

Reference Material - NRC Inspection Report No. 50-346/2003-018 (ADAMS Accession No. ml033080433).

March 22, 2004

RAM Item No. - NCV-27

Closed: Y

Description of Issue - Control Room Staff Did Not Adequately Monitor and Control Reactor Coolant System Pressure Which Resulted in CF1B Opening Unexpectedly.

Description of Resolution - This was a performance issue because preventing the automatic actuation of CF1B was reasonably within the licensee's ability to control and actuation could have been prevented. The licensee did classify this event as a Significant Condition Adverse to Quality and performed a root cause analysis to determine the causes of this event. From this report, several corrective actions were assigned to CR 03-07746, "Inadvertent Opening of CF1B." Specific corrective actions that addressed fundamental watch standing weaknesses included; revising operator training to highlight the auto-opening features of CF1A/1B, discussing with the operating crews how not monitoring SFAS channel 3 pressure indications contributed to the opening of CF1B, and to utilize training to emphasize the concept of using an "operating envelope" when maneuvering the plant. When successfully completed and implemented, these corrective actions should reduce the chances of recurrence of this event and improve general watch standing performance.

Reference Material - NRC Inspection Report No. 50-346/2003-018 (ADAMS Accession No. ml033080433).

March 22, 2004

RAM Item No. - NCV-28

Closed: Y

Description of Issue - As documented in Inspection Report 05000346/2003018, an NCV was issued for the failure of the licensee to address all significant causal factors related to the configuration control aspects associated with the installation of unqualified relay in the SFAS system.

Description of Resolution - The licensee failed to take effective corrective actions to fully address the cause of the condition, namely, addressing the configuration control aspect of how five unqualified relays remained installed in SFAS for an extended period of time without the applicable engineer's knowledge. The inspectors determined that, although the corrective actions were not complete, that there are no open corrective actions which require closure prior to restart, and that the planned corrective actions would appropriately address the causes of the performance deficiency. The inspectors also reviewed the outstanding corrective action due dates and determined they were appropriate.

Reference Material - NRC Inspection Report 05000346/2003018 (ADAMS Accession No. ml033080433), CR 03-08556.

RAM Item No. - NCV-29

Closed: Y

Description of Issue - No Procedural Guidance for Performing Immediate Action Maintenance.

Description of Resolution - The performance deficiency associated with this issue was that the licensee failed to provide procedural guidance on how maintenance performed utilizing the Immediate Action Maintenance process was controlled, reviewed, or tested, to verify the adequacy of the maintenance activity. The inspectors reviewed a new licensee procedure NOP-WM-4002, "Repair Identification and Toolpouch Maintenance," Revision 2, and found the procedure sufficiently outlined the process to be used when the Immediate Action Maintenance process was implemented.

Reference Material - NRC Inspection Report No. 50-346/2003-018 (ADAMS Accession No. ml033080433) and licensee condition report nos. 03-08776, 03-08622, and 03-08791

March 22, 2004

RAM Item No. - NCV-30

Closed: Y

Description of Issue - Improper Implementation of DB-OP-00000, "Conduct of Operations," Revision 06, pertaining to the implementation of the Immediate Action Maintenance (IAM) process. This process was improperly implemented to perform routine adjustments on an auxiliary feedwater pump governor.

Description of Resolution - The performance deficiency associated with this event is the senior operations management inappropriately authorized the performance of the Immediate Action Maintenance process to perform adjustments on 1 turbine driven auxiliary feedwater pump governor. The inspectors reviewed procedure DB-OP-00000, "Conduct of Operations," Revision 07. This revision eliminated the improper entry criteria for the use of the Immediate Action Maintenance Process. The new revision specifically states that work performed will be categorized as "Priority 100 - Immediate." Procedure NOP-WM-4002, "Repair Identification and Toolpouch Maintenance," Revision 01, defined Priority 100 work as "A condition which is an immediate or imminent threat to nuclear safety or personnel/public safety. Work the necessary resources 24 hours per day to achieve completion at the earliest possible time."

Reference Material - NRC Inspection Report No. 50-346/2003-018 (ADAMS Accession No. ml033080433) and licensee condition reports (CRs) 03-08776, 03-08622, and 03-08791.

RAM Item No. - NCV-31

Closed: Y

Description of Issue - Requests for Issues: Square D EDG Relays In the Start and Run Circuits Were Not Rated For the Current Application.

Description of Resolution - The licensee performed testing that was statistically significant. The licensee tested 10 relays at the expected DC amperage. Each relay was cycled 500 times. There was no noticeable degradation of the contacts on any relay. The vendor stated that the testing was acceptable. Based on the inspector's technical judgement, the testing that the licensee has done is suitable to show that there is a low probability of relay failure.

Reference Material - NRC Inspection Report No. 50-346/03-022 (ADAMS Accession No. ml033570081).

March 22, 2004

RAM Item No. - NCV-32

Closed: Y

Restart Checklist Item - 5.d

Description of Issue - Requests for Issues: Failure to Verify Adequacy of Short Circuit Protection for Direct Current Circuits. While reviewing condition reports and calculation, the team questioned the adequacy of DC circuit protection for long DC circuits. Subsequently, the licensee evaluated the adequacy of the fuse sizing and identified that, in the case of short circuits, the circuit resistance could be high enough to preclude operation of the fuses protecting circuits. Thus, a short circuit current could be allowed to flow for an indeterminate length of time.

Description of Resolution - The licensee issued CR 03-06944 to document the deficient circuit protection for valves having long circuit lengths. The licensee developed an engineering package to replace the fuses in March 2004. The inspectors reviewed the licensee's engineering package and concluded that the projected completion date appears reasonable and commensurate with the safety significance of the issue. The inspectors concluded that this approach was acceptable and does not represent a restart constraint.

A NCV of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," having very low safety significance (Green) was issued in NRC Inspection Report 50-346/03-10.

Reference Material - NRC Inspection Report No. 50-346/03-10, (ADAMS Accession No. ml040680070).

March 22, 2004

RAM Item No. - NCV-33

Closed: Y

Restart Checklist Item - 5.d

Description of Issue - Requests for Issues: Lack of Calculations to Ensure Minimum Voltage Availability at Device Terminals.

Description of Resolution - As a part of CR 01-03059, the licensee performed an extent of condition evaluation and identified that calculation C-EE-002.01-010 evaluated available DC voltage to the panel terminals only. The calculation did not confirm sufficient voltage at device terminals for proper operation. The licensee issued CR 02-00412 to document this deficiency. In response to this CR, the licensee issued a revision to the calculation.

The team identified deficiencies in calculation C-EE-002.01-010 regarding voltage drop in parts of the circuits. The licensee issued CR 03-06956 and performed additional analysis and extent of condition reviews. The licensee determined that there were no operability issues based on the results of the re-analysis. The team reviewed these re-analysis and concluded there is reasonable assurance that the affected components are operable. The team has no concerns regarding this item for restart.

An NCV of 10 CFR Part 50, Appendix B, Criterion III, having very low safety significance (Green) was issued in NRC Inspection Report 50-346/03-10.

Reference Material - NRC Inspection Report No. 50-346/03-10, (ADAMS Accession No. ml040680070).