

EP Seismic Alert and SAE

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Criteria XVI

NRC Identified

Findings

Inadequate corrective action to ensure the ability to timely classify certain seismic seismic events

Introduction: The inspectors identified a finding involving the licensee's failure to take adequate corrective action to ensure timely classification of certain seismic emergency events. Specifically, the licensee failed to ensure that seismic events could be timely categorized since the licensee could not confirm a time frame it required to obtain or validate onsite seismic instrumentation readings for the Alert or Site Emergency seismic events. The licensee received a previous violation regarding its inability to timely classify these emergency events.

Description: The EALs for operational basis and safe shutdown earthquakes (Alert EAL 6.1.1.2 and Site Area Emergency (SAE) EAL 6.1.1.3) required declaration of an emergency event when one of the two operational seismic monitors is confirmed to exceed the event thresholds defined in the EAL. The operational monitors are located in the drum preparation room, and between the vital switchgear room and the auxiliary feedwater tunnel. Laptop computers were used to access and read the level of seismic activity sensed by the monitors. The inspectors identified that only Instrument and Control (I&C) technicians were trained to use the portable laptop computers to read the seismic monitors. Following a previous violation for failing to assign on-shift responsibilities for reading the seismic monitors, thus affecting the ability to timely classify certain seismic events, I&C technicians were assigned on-shift at the facility, and were therefore immediately available during off-normal working hours.

However, for the Alert and Site Emergency EAL's, the licensee's procedures require that the Seismic Event Monitor readings obtained by the on-shift I&C technician and be "validated" to ensure the readings are accurate and do require the declaration of an Alert or Site Emergency. Such validation could require the licensee to contact off-site entities to confirm readings of on-site instrumentation. The licensee was unable to provide information on the length of time it would take for the I&C technician to obtain the data from the seismic instruments nor was the licensee able to provide information on the length of time it would take to validate this data using information from off-site entities. The licensee also confirmed that no drills had been conducted to determine these time frames.

The inspectors concluded that the licensee, following the previous violation regarding its inability to timely classify certain seismic emergency events, failed to take adequate corrective action to ensure it could assess and validate in a timely manner the level of seismic activity, which could delay the declaration of the associated Alert or Site Area Emergency.

Analysis: The failure to take adequate corrective action to ensure the timely performance of an emergency response organization function is a performance deficiency that is more than minor because it is associated with a cornerstone attribute and affected the EP cornerstone objective

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(to ensure the adequate protection of the public health and safety). The finding involved the failure to take adequate corrective action to ensure the ability to implement emergency action levels in a timely manner. When processed through the EP Significance Determination Process (SDP), the finding was found to have very low safety significance because it did not represent a planning standard function failure. The inspectors identified this finding while questioning the ability of control room personnel to receive necessary information to implement a sampling of EALs.

Enforcement: 10 CFR 50.54(q) provides in part that "A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in §50.47(b). . ." 10 CFR 50.47(b) requires that the onsite emergency response plans for nuclear power reactors meet each of 16 planning standards, of which, planning standard 2 states, in part: "On-shift facility responsibilities for emergency response are unambiguously defined,.....timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified". The licensee previously received a non-cited violation for failure to comply with this regulation. 10 CFR 50 APP. B Section XVI states , in part: " Measures shall be established to ensure that conditions adverse to qualityare promptly identified and corrected." Contrary to this, the licensee failed to implement adequate corrective action to ensure that on-shift I&C technicians could, in a timely manner, obtain data needed to classify certain seismic emergency events. In addition, the licensee failed to ensure that validation of data obtained onsite could be performed by off- site entities in a timely manner. Failure to implement adequate corrective action, following the aforementioned previous violation, to ensure the ability be able to read or validate the monitors in a timely manner during or immediately following a seismic event is a violation. Because this violation involves the failure of the licensee to take adequate corrective action on a previous violation, it is being dispositioned as a green cited violation.