

Not in report yet.

Operator TS awareness
example in plant findings

2SI-825B Not Full Open

NRC ID'ed

TSAC 3.5.2 SR 3.0.1

Introduction:

The inspectors identified a Non-Cited Violation (NCV) of TS having very low safety significance (Green) for the licensee's failure to enter Technical Specification 3.5.3, "Two ECCS Trains Shall Be Operable," when the safety injection pump suction valve, 2SI-825B, "RWST Outlet to 2P-15A/B," was declared out of service during the performance of surveillance IT-02, "High Head SI Pump and Valves".

Description:

During the performance of control board walkdowns on April 1, 2004 the inspectors noticed that safety injection pump suction valve, 2SI-825B, "RWST Outlet to 2P-15A/B," open and closed indicating lights were lit. The inspectors questioned the operations crew as to the status of the valves and was informed that the valve had been declared out of service during the performance of the surveillance test on March 31, 2004. Following step 5.3.10 (Open 2SI-825B) the valve showed intermediate indication on control panel C-01. Local indication showed that the valve had about another one quarter of an inch travel to full open. After questioning by the inspectors the Technical Specification was entered on April 1, 2004 and back dated to the time of the occurrence.

Analysis:

the inspectors determined that failure to enter Technical Specification 3.5.2 was a performance deficiency warranting a significance determination. The inspectors concluded that the finding was greater than minor in accordance with IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Disposition Screening," issued on June 20, 2003. In accordance with IMC 0609, Appendix A, the inspectors performed a SDP Phase 1 screening and determined that the finding affected the attribute of operability could have affected the mitigating system objective of the reactor safety cornerstone of ensuring the availability of systems that respond to initiating events to prevent undesirable consequences because of an event requiring ECCS as well as human performance. The finding also affected the cross-cutting area of Human Performance because operators did not recognize the entry requirements for Technical Specification 3.5.2 because of valve 2SI-825B being declared inoperable, despite having entered the Technical Specification for the surveillance. This will be discussed in section 4OA4.

The inspectors completed a significance determination of this issue using IMC 0609, "Significance Determination Process (SDP)," dated March 21, 2003, Appendix A, "Users Guide for Significance Determination of Reactor Inspector Findings of At-Power reactors," dated March 18, 2002. The inspectors determined that the finding was of very low safety significance (Green) because the system would have met its design function.

Enforcement:

Surveillance Requirement 3.5.2.1 states, "Verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position." Contrary to this on March 31, 2004 the licensee did not enter Technical Specification 3.5.1, Action "A" when the valve was declared

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inoperable during a surveillance test. This issue was considered a finding (FIN) of very low safety significance (FIN XXXXXXXXX). This violation was entered into the licensee's corrective action program as CAP055226, "2SI-825B shows intermediate valve position during IT-02."