



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4125

August 14, 2008

MEMORANDUM TO: Harry Freeman, Senior Allegation Coordinator
Judith Walker, Allegation Coordinator

FROM: Gilbert L. Guerra, Senior Project Engineer, Project Branch A

THRU: Claude E. Johnson, Chief, Project Branch A

SUBJECT: REVIEW OF LICENSEE RESPONSE TO ALLEGATION
(RIV-2008-A-0086)

The concerns were referred to Energy Northwest (Columbia Generating Station) for review. The NRC's Region IV Project Branch A staff's review of the licensee's response found that the licensee had substantiated the allegation. The investigation was performed by a licensee employee who was independent of the nuclear generation organization. The employee was well qualified to perform this investigation and the investigation was of sufficient depth and scope.

Concern

The protected equipment program is not being properly implemented. Examples from the spring 2007 refueling outage (RF018) include: (1) The licensee had four different sources that listed protected equipment but all four were different; and (2) None of the four lists matched the equipment signs in the plant.

Licensee's Assessment

1. The licensee's investigation into this concern included interviews with key managers and staff and a review of corrective action databases including the Plant Tracking Log, Problem Evaluation Requests, Condition Reports, and Action Requests from July 2004 through July 2008 to reveal information pertinent to this concern. Also, reviews of the controlling procedures were performed.
2. The licensee found two condition reports addressing this concern.

CR-2-07-04955, written on May 24, 2007, documented that Procedure PPM 1.20.3, "Outage Risk Management," and Procedure OI-49, "Protected Systems," were not in agreement with regard to when protected equipment signs were used. Procedure 1.20.3, states that, "Areas around protected Key Safety Function Equipment and their power supplies **should** be controlled by 'Protected Equipment Area' signs near or at the entrance to these equipment areas." Procedure OI-49, states that, "Protected signs are normally used in the Main

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Control Room only. Although **not normally required**, protected signs **may be placed** in the field as determined by the shift Manager." (Bold added for emphasis)

[CR-2-07-05790, written on June 9, 2007] documented that three protected equipment lists from three different sources were compared and they were not in alignment. The protected equipment information in these three sources differed on exactly what equipment was protected. Plant equipment was also checked to see if signs were posted and this differed with what was listed in the Control Room Log.

3. The licensee substantiated the concern, stating that there was ample evidence that the implementation of the protected equipment program was less than adequate. Specifically, the operations instruction and the outage procedure were not well aligned as to which document was controlling and specifically what mechanisms would be utilized to ensure the appropriate systems were identified and the appropriate signs hung in the field. Corrective actions included aligning the procedures to state that during outage periods Procedure PPM 1.20.3, "Outage Risk Management," should be referenced for posting recommendations, and that during at power operations Procedure OI-49, "Protected Systems," is referenced. Additionally, a third Condition Report (AR-CR 00184225) was opened stating that operations and outage management should review the investigation report and CRs 2-07-04955 and 2-07-05790, and that corrective actions be initiated to ensure that protected equipment lists from different sources are in alignment and that protected equipment signs are posted for all protected systems as required by PPM 1.20.3.

NRC Resolution

1. The NRC Project Branch A staff assessed the licensee's investigation and independently reviewed the above mentioned condition reports and procedures. The staff determined that the concern was substantiated in that the protected equipment program was not properly implemented during RFO18. The corrective action taken and proposed by the licensee appeared sufficient to address the concern.
2. No enforcement action is recommended. Specifically, procedures OI-49 and PPM 1.20.3 are not safety-related, nor required by technical specifications and as a result are not subject to enforcement. These procedures, which prescribe actions to take for protecting equipment during both operational and shutdown modes of operation, only recommend the posting of signs for protected equipment. Additionally, the referenced corrective action documents provide that the concerns were self-identified and evaluated by the licensee. The errors had no actual impact on safety equipment (i.e. no work was inadvertently performed on the protected equipment as a result of any mis-posted signs or any potential confusion caused by the differing protected equipment lists) and caused no safety consequences. Therefore, the inspectors determined that the corrective action taken and proposed by the licensee appeared sufficient to address this concern.