

Davis-Besse

Initiating Events

Mitigating Systems



Significance: Nov 14, 2002

Identified By: NRC

Item Type: FIN Finding

INADEQUATE IMPLEMENTATION OF THE CORRECTIVE ACTION PROCESS WHICH LED TO NOT IDENTIFYING A POTENTIALLY REPORTABLE ISSUE

The inspectors identified numerous examples of the improper implementation of the licensee's corrective action program, in regards to evaluating and taking corrective actions for potentially reportable issues associated with the containment air coolers. This was a performance deficiency. This was considered a finding of more than minor safety significance because if left uncorrected it would become a more significant safety concern in that it could adversely impact the NRC in its effort to identify and resolve issues important to public safety. The inspectors determined that the issue was not a violation of regulatory requirements because formal operability and reportability evaluations had not yet been completed.

Inspection Report# : [2002017\(pdf\)](#)



Significance: Sep 30, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO DEVELOP AND USE PROCEDURES APPROPRIATE TO THE CIRCUMSTANCES WHEN ERECTING SCAFFOLDING IN THE EMERGENCY DIESEL GENERATOR ROOMS

A finding of very low safety significance was identified in that the licensee had no procedural guidance to control the construction of scaffolding in a manner that would assure proper operation of ventilation for safety related equipment. During a post maintenance emergency diesel generator run on July 25, 2002, the EDG 2 Trouble Alarm was received due to high room temperature. Licensee investigation concluded that the scaffolding in the room restricted air circulation and produced the high temperature condition. The finding was more than minor because if left uncorrected, the lack of procedural guidance could impede the proper operation of ventilation systems for safety related equipment when the plant is not operating in Mode 6. The inspectors concluded that licensee procedure DB-MS-01637, "Scaffolding Erection and Removal," Revision 5, was not appropriate to the circumstances in that the procedure failed to consider the impact of scaffolding erection on ventilation system heat removal capability. The finding was of very low safety significance because there was no fuel in the reactor pressure vessel and no fuel movement was in progress. This was determined to be a Severity Level IV NCV of 10 CFR 50 Appendix B, Criterion V.

Inspection Report# : [2002010\(pdf\)](#)

Barrier Integrity



Significance: Aug 01, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to provide acceptance criteria or requirements to follow the inspection plans

Green. Inspectors identified a Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," in that, the licensee failed to provide acceptance criteria or requirements to follow the inspection plans used for the extent of condition inspections of systems in containment. This finding was considered to be more than minor because it had the potential to affect the barrier integrity cornerstone (procedure quality attribute). This finding, if left uncorrected, could have become a more significant safety concern in that, lack of acceptance criteria and plan adherence criteria could have resulted in the failure to detect degraded systems, structures and components within containment. Subsequently, the licensee implemented actions to revise inspection plans and procedures, incorporate acceptance criteria, and reperform the containment inspections. This finding was determined to be of very low risk significance .

Inspection Report# : [2002009\(pdf\)](#)

G**Significance:** Aug 01, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to adequately train personnel that were VT-2 certified

Green. Inspectors identified a Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," in that, the licensee failed to adequately train personnel for VT-2 certification to perform containment area extent of condition walkdowns. This finding was considered to be more than minor because, if left uncorrected, it could have become a more significant safety concern in that, use of improperly trained personnel could have resulted in the failure to detect degraded systems, structures, and components within containment. Subsequently, the licensee implemented actions to repeat these inspections using personnel trained and certified to a newly developed boric acid and corrosion control inspector training standard. This finding was determined to be of very low risk significance

Inspection Report# : [2002009\(pdf\)](#)

Emergency Preparedness

Occupational Radiation Safety

G**Significance:** Dec 28, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO RESPOND TO DOSIMETER ALARMS

A finding of very low safety significance was identified through self revealing events. On two separate occasions, workers in containment received dose rate alarms on their electronic dosimeters and did not take the actions required by procedure DB-HP-01901, "Radiation Work Permits" Revision 7, and Radiation Work Permit (RWP) 2002-5571. These documents state that radiation worker response requirements for a dose rate alarm are to place the work in a safe condition, exit the work area, and notify Radiation Protection personnel of the alarm. The finding was more than minor because if left uncorrected workers could receive a greater radiological exposure than was planned for, unnecessary exposure, and could lead to a performance indicator occurrence for unintended dose. The finding was of very low safety significance because the procedure violation was not an As Low As Is Reasonably Achievable issue, did not involve an overexposure, did not involve a substantial potential for an overexposure and did not compromise the licensee's ability to assess dose. The finding was therefore Green. The finding resulted from a violation of Technical Specification 6.8.1 which requires the implementation of radiation protection procedures.

Inspection Report# : [2002019\(pdf\)](#)G**Significance:** Mar 31, 2002

Identified By: Licensee

Item Type: NCV NonCited Violation

FAILURE TO PROPERLY CONTROL ACCESS TO A LOCKED HIGH RADIATION AREA

A violation of very low significance which was identified by the licensee has been reviewed by the inspectors. Corrective actions taken or planned by the licensee appear reasonable.

Inspection Report# : [2002002\(pdf\)](#)W**Significance:** Feb 20, 2002

Identified By: NRC

Item Type: VIO Violation

Failure to Take Timely and Suitable Measurements of Radioactive Material Which Led to a Compromised Ability to Assess Dose.

The licensee failed to take timely and suitable measurements of radioactive material in the air, in workers' bodies, or excreted from the workers during and following the nozzle dam installations. The failure of the licensee to obtain and properly analyze representative air samples during the work activity and/or adequately conduct bioassay measurements so as to characterize the radiological intake is a violation of 10 CFR 20.1204. This issue has low to moderate safety significance (White) and represented a performance deficiency because the failure to determine the transuranic isotopes present in the steam generator prior to the job, to adequately determine the quantity of radionuclides in the workers' bodies until over 200 days after the event, and the failure to obtain representative air samples in the workers' breathing zones all contributed to the compromised ability to assess dose.

Inspection Report# : [2002016\(pdf\)](#)



Significance: Feb 20, 2002

Identified By: NRC

Item Type: VIO Violation

Failure to Conduct an Adequate Radiological Evaluation Which Led to a Substantial Potential for Overexposure

The licensee failed to conduct an adequate evaluation of the radiological hazards which led to inadequate job controls for steam generator nozzle dam installation. The failure to adequately evaluate the potential radiological hazards associated with nozzle dam installations is a violation of 10 CFR 20.1501, which requires licensees to conduct adequate evaluations to ensure compliance with the occupational exposure limits of 10 CFR 20.1201. This issue had low to moderate safety significance (White) and represented a performance deficiency because the licensee had several indicators of potentially degraded radiological conditions and had opportunities to identify and evaluate the radiological hazards present in the steam generator environment but failed to adequately do so prior to worker entries. The failure to conduct an adequate evaluation resulted in a substantial potential for an overexposure.

Inspection Report# : [2002016\(pdf\)](#)

Public Radiation Safety



Significance: Feb 20, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to perform Adequate Surveys and Control Licensed Radioactive Material

The licensee failed to conduct adequate surveys of the workers following their internal and external contamination during the steam generator nozzle dam installation job. The failure to perform adequate surveys of the workers is a violation of 10 CFR 20.1501 which requires licensees to conduct adequate evaluations to ensure compliance with the requirements for the control of licensed radioactive material as defined in 10 CFR 20.1802. This issue has been determined to have very low safety significance (Green). The issue represented a performance deficiency because the licensee had several opportunities to conduct adequate surveys of the workers prior to releasing them from the site. The failure to conduct an adequate evaluation resulted in the uncontrolled transport of radioactive material offsite and into the public domain.

Inspection Report# : [2002006\(pdf\)](#)



Significance: Feb 15, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO PLACARD RADIOACTIVE SCO SHIPMENT

A finding and associated Non-Cited violation of 10 CFR 71.5(a) and the Department of Transportation regulations contained in 49 CFR 172.504 was identified for the failure to placard vehicles used to transport radioactive materials. This finding was determined to be of very low safety significance because the shipment was exclusive use, dose rates were minimal, the shipment was marked properly, and the shipping papers were correct.

Inspection Report# : [2001016\(pdf\)](#)

Physical Protection

Miscellaneous



Significance: Nov 14, 2002

Identified By: NRC

Item Type: FIN Finding

10 CFR 50.70(b)(4) DEFICIENCY

The inspectors observed a licensee employee warning two other licensee employees about the presence of NRC inspectors. This was a licensee performance deficiency in that 10 CFR 50.70(b)(4) requires, in part, that "the arrival and presence of the NRC inspector is not announced or otherwise communicated by its employees or contractors to other persons at the facility unless specifically requested by the NRC inspector."

This was considered a finding of more than minor safety significance because if left uncorrected, it would become a more significant safety concern in that the NRC's ability to carry out its statutory mission would be impeded. The inspectors determined that this issue was not a violation of 10 CFR 50.70(b)(4) because the warning by the licensee employee was not widespread nor a significant intentional violation of the rule per the 10 CFR Part 50 Statement of Considerations. The inspectors concluded that this was a finding was of very low safety significance (Green) that was not suited for analysis by the significance determination process.

Inspection Report# : [2002017\(pdf\)](#)

Significance: SL-IV Dec 31, 2001

Identified By: NRC

Item Type: VIO Violation

SL IV VIOLATION OF 10 CFR 50.7

The NRC concluded that a security officer was discriminated against for engaging in protected activities within the scope of 10 CFR 50.7, "Employee Protection." A security supervisor subjected the officer to a fact-finding meeting on January 12, 2001, and placed a copy of the documentation from the meeting in the security officer's personnel file. The NRC determined that these actions were taken, at least in part, as a result of the security officer engaging in protected activity when he identified and documented in the condition report the potential security department training deficiency. The NRC issued a Notice of Violation by letter dated December 20, 2001, requiring a response by the licensee (VIO 50-346/01-15-01).

Inspection Report# : [2001015\(pdf\)](#)

Last modified : March 25, 2003