

## Monticello

### Initiating Events

### Mitigating Systems



**Significance:** Jun 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Meet the Separation Criteria for Redundant Cabling and Equipment in Fire Zone 23A, Intake Structure Pump Room**

The inspectors identified a NCV of 10 CFR Part 50, Appendix R, Section III.G.2 associated with a failure to protect redundant trains of equipment and cabling in the intake structure area. Specifically, the inspectors identified the presence of intervening combustible between two trains of Emergency Service Water (ESW) system. The two trains were separated by more than 20 feet and the fire area contained detection and suppression capabilities. This finding was determined to be more than minor because it affected the mitigating system cornerstone objective. This finding was evaluated using the SDP and determined to be Green. Because the finding was of very low safety significance, and was captured in the licensee's corrective action system, this finding is being treated as a NCV consistent with Section VI.A.1 of the NRC Enforcement Policy.

Inspection Report# : [2002011\(pdf\)](#)



**Significance:** Jun 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Procedures C.4-b-8.5.A, "Plant Fire," C.4-C, "Shutdown Outside the Control Room," and Other Related Procedures Associated with Responding to a Plant Fire Were Not Appropriate to the Circumstances.**

The inspectors identified a NCV of 10 CFR Part 50, Appendix B, Criterion V associated with a failure to ensure that some operations procedures were appropriate to the circumstances. Specifically, the inspectors determined that some operations procedures did not clearly identify the minimum set of actions necessary to ensure a safe shutdown of the reactor, following a fire, and ensure that adequate emergency lighting and communications were available to support those operator actions. This finding was determined to be more than minor because it could reasonably be viewed as a precursor to a significant event where required operator actions may not be accomplished in a timely manner due to inadequate operations procedures, and a lack of emergency lights and radios. Using the IMC 0609, Appendix F, this finding is characterized as Green because it did not affect detection, manual suppression capability, automatic suppression capability, fire barriers, or 20-foot separation.

Inspection Report# : [2002011\(pdf\)](#)



**Significance:** Jun 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Maintain Full Area Detector Coverage in Zones 23A, 14A, 13B, 19A, and 19B.**

The inspectors identified a NCV of 10 CFR 50.48 associated with inadequate fire detection capabilities in several fire areas. Specifically, the inspectors identified inadequate number and spacing of smoke detectors in two 4160-volt switchgear rooms and inadequate number and spacing of heat activated detectors in the reactor feed pump (RFP) area. This finding was determined to be more than minor because it could reasonably be viewed as a precursor to a significant event where a delay in fire detection in safety related switchgear and RFP areas could result in a more severe fire and render more equipment inoperable. In addition, the finding affected the mitigating system cornerstone objective in that the necessary number of detectors were needed to ensure the reliability, availability, and capability of systems that respond to initiating events to prevent undesirable consequences. Since the finding did not affect the 3-hour fire barrier separating redundant safe shutdown functions (IMC 0609, Appendix F, Figure 4-5), this finding was characterized as Green.

Inspection Report# : [2002011\(pdf\)](#)



**Significance:** Jun 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to maintain Complete Sprinkler Coverage in Fire Zones 13A and 13B.**

The inspectors identified a NCV of 10 CFR 50.48 associated with inadequate fire suppression capabilities in several fire zones. Specifically, the inspectors determined that the sprinkler systems in fire zones 13A and 13B did not provide complete coverage of the areas. This finding was determined to be more than minor because it can be reasonably viewed as a precursor to a significant event where an uncontrolled fire in these areas could spread and potentially cause damage to the redundant trains of safe shutdown equipment in other fire zones. Since the finding did not affect the 3-hour fire barrier separating redundant safe shutdown functions (IMC 0609, Appendix F, Figure 4-5), this finding is Green. Inspection Report# : [2002011\(pdf\)](#)

G

**Significance:** Jun 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Enter Conditions Adverse to Quality into the Corrective Action Program and to Correct Conditions Adverse to Quality.**

The inspectors identified a Green NCV of 10 CFR Part 50, Appendix B, Criterion XVI, associated with a failure to document conditions adverse to quality in the corrective action program and a failure to resolve several fire protection-related conditions adverse to quality entered into the corrective action program. Specifically, some findings, developed as a part of an internal self-assessment, were not entered into the corrective action program and other conditions adverse to quality, associated with transfer of fire protection requirements out of the Technical Specifications and inspection findings, were not corrected. This finding is more than minor because if left uncorrected, the finding would become a more significant safety concern. Failure to enter fire protection non-compliance items and failure to resolve the items entered into the corrective actions program could potentially affect the availability, reliability, and capability of fire protection safe shutdown equipment and response efforts. This finding is not suitable for SDP analysis. However, the inspectors determined that this finding was of very low significance (Green) because each associated performance deficiency, identified during this inspection, was of very low significance. Therefore, the finding was characterized as Green.

Inspection Report# : [2002011\(pdf\)](#)**Significance:** SL-IV Jun 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform Written Safety Evaluations and Submit a Summary to the NRC for Changes Made to the FPP, FHA, and SSA from 1984 to 2001.**

The inspectors identified a Severity Level IV NCV of 10 CFR 50.59 associated with a failure to control and maintain changes made to the fire protection program (FPP) since 1984. Because violations of 10 CFR 50.59 are considered to be violations that could potentially impede or impact the regulatory process, they are dispositioned using the traditional enforcement process instead of the SDP. Since the SDP is not designed to assess the significance of violations that could potentially impact or impede the regulatory process, the "results of a 10 CFR 50.59 violation" are assessed using the SDP and the severity level of the 10 CFR 50.59 violation is then based on this significance determination. In this case, the licensee's failure to control and evaluate changes to components of the FPP resulted in the implementation of the program in a manner different than approved by the NRC, as documented in relevant Safety Evaluation Reports (SERs). Examples of these differences are presented in other sections of this report. The inspectors concluded that the issue had a credible impact on safety because the licensee's failure to control and evaluate changes to the FPP could adversely affect the reliability, capability, and availability of safe shutdown capabilities, as discussed in the other sections of this report. However, based upon a review of the current plant configuration and an assessment of the impacts of the examples discussed in this report, the inspectors determined that the licensee's failure to properly control and evaluate changes to be of very low safety significance. Therefore, the issue was determined to be of very low safety significance, i.e., a Green finding.

Inspection Report# : [2002011\(pdf\)](#)

G

**Significance:** May 04, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**INADEQUATE DEBRIS CONTROL IN ECCS CORNER ROOMS CHALLENGES INTERNAL FLOODING ANALYSIS.**

Inspectors identified debris in the emergency core cooling system (ECCS) corner rooms which potentially could have had an adverse effect on installed flood protection equipment during an internal flooding event. The lack of adequate debris control procedures and instructions was determined to be a Non-Cited Violation (NCV) of Criterion V, 10 CFR 50, Appendix B. The finding was determined to be of very low safety significance and within the licensee's response band due to the very low risk associated with the event that was identified during a case specific Phase 3 SDP.

Inspection Report# : [2002004\(pdf\)](#)

G**Significance:** Aug 23, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**TAGOUT/ISOLATION ERROR DISCHARGES 2000 GALLONS FROM FUEL POOL SURGE TANK TO RADWASTE AND RESULTS IN LOSS OF SPENT FUEL POOL COOLING.**

A finding and an associated Non-Cited Violation (NCV) for failure to follow applicable procedural guidance as required by Technical Specifications were identified by inspectors. The finding and NCV were associated with a loss of spent fuel pool cooling which resulted from an improper licensee valve tagout/clearance operation. Because the decay heat load in the spent fuel pool was relatively low the spent fuel pool temperature increase limited from 90.5 degrees Fahrenheit to approximately 96.5 degrees Fahrenheit and the event involved only the fuel cladding barrier, the finding was determined through a Phase 1 SDP to be of very low safety significance and within the licensee response band.

Inspection Report# : [2002005\(pdf\)](#)**Significance:** N/A Feb 13, 2002

Identified By: Licensee

Item Type: NCV NonCited Violation

**REFUELING TESTING IDENTIFIES CONTAINMENT ISOLATION VALVE LEAKAGE GREATER THAN ALLOWED BY THE TECHNICAL SPECIFICATIONS.**

Licensee Identified Violation. See Inspection Report 50-263/02-02(DRP) Section 4OA3.2 and description for closure of LER 50-263/2001-012, "Refueling Testing Identifies Containment Isolation Valve Leakage Greater Than Allowed by the Technical Specifications."

Inspection Report# : [2002002\(pdf\)](#)

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## Emergency Preparedness

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## Occupational Radiation Safety

G**Significance:** Mar 14, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

**RADIATION WORKER VIOLATED RADIATION WORK PERMIT REQUIREMENTS.**

The inspector reviewed incidents related to access control deficiencies and radiation worker practices. During an on-the-job training tour of vital areas, workers failed to follow the requirements of the radiation work permit resulting in a small unintended dose. The failure of the workers to follow licensee procedures constitutes a Non-Cited Violation of Technical Specification 6.5.1. The finding was of very low safety significance as the event did not involve an overexposure or a substantial potential for an overexposure and did not compromise the licensee's ability to assess personnel dose.

Inspection Report# : [2002003\(pdf\)](#)

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## Public Radiation Safety

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## Physical Protection

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## Miscellaneous

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