

Arkansas Nuclear 2

2Q/2003 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Sep 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO FOLLOW PROCEDURE FOR EDG HEAT EXCHANGER THERMAL PERFORMANCE TESTS

Green. The inspectors identified that a violation of Unit 1 Technical Specification 5.4.1(a) and Unit 2 Technical Specification 6.8.1(c) occurred failing to properly conduct a surveillance test on safety-related equipment. Emergency diesel generator heat exchanger thermal performance tests were not performed in accordance with procedures that were written to ensure that temperature stabilization requirements were met. The failure to follow surveillance test requirements is considered a violation of Unit 1 Technical Specification 5.4.1(a) and Unit 2 Technical Specification 6.8.1(c) (50-313/02-04-02; 50-368/02-04-02). This violation is being treated as a noncited violation and is in the licensee's corrective action program as Condition Report C-2002-00710. The issue was more than minor due to repeated failures to ensure temperature stabilization requirements during surveillance tests on multiple pieces of equipment. The issue impacted the mitigating systems cornerstone in that it affected the ability to monitor thermal performance of the emergency diesel generators. This issue was characterized as a Green finding using the Significance Determination Process because upon completion of subsequent satisfactory test performance, the issue did not represent an actual loss of safety function.

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

Significance:  Sep 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO HAVE ADEQUATE PROCEDURAL CONTROLS FOR THE USE OF FIRE RETARDANT TREATED WOOD

Green. The inspectors identified a noncited violation of Unit 2 Technical Specification 6.8.1(f). The licensee's procedure for control of combustibles inappropriately considered fire retardant treated wood, both pressure treated and coated, as a noncombustible material. This could lead to the uncontrolled use of fire retardant treated wood throughout the facility, even in excess of Fire Hazard Analysis limits for fire loads. Combustible material (fire retardant treated wood), that exceeded the amount assumed in the Fire Hazard Analysis, was found in the Unit 2 east battery room, an area without automatic suppression. The failure to have administrative or procedural controls in place that controlled this material, analyzed the potential hazard, or provided compensatory measures for the fire zone was a violation of Technical Specification 6.8.1(f) (50-368/02-04-01). This violation is being treated as a noncited violation and is in the licensee's corrective action program as Condition Report C-2002-00783. The excessive fire load condition was considered greater than minor because the fire barrier was not adequate for the as-found conditions. This issue was characterized as a Green finding using the fire protection attachment of the Significance Determination Process. It was

determined to have very low risk significance because, when manual suppression capability was credited, fire zones adjoining the Unit 2 east battery room containing redundant-train equipment were unaffected.

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



Significance: Sep 21, 2002

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO IDENTIFY REPEAT FUNCTIONAL FAILURES.

Green. The inspectors identified a noncited violation of 10 CFR 50.65(a)(2). The licensee failed to set goals and monitor the performance of the reactor coolant system as required by 10 CFR 50.65(a)(1), from April 5, 2001, till October 12, 2001, after it had failed to demonstrate effective control of the performance of the reactor coolant system through appropriate preventive maintenance. Specifically, the licensee did not identify repetitive functional failures of a vent to fail to open. As required by 10 CFR 50.65(a)(2), effective control of system, structure, or component performance or condition through appropriate preventive maintenance must be demonstrated in order for the monitoring under Paragraph (a)(1) not to be required. The inspectors considered this violation noncited consistent with Section VI.A.1 of the NRC Enforcement Policy (50-313/02-04-03; 50-368/02-04-03). The licensee documented this violation in the licensee's corrective action program as Condition Report CR-ANO-C-2002-00734. The inspectors considered this violation more than minor because the failure to identify repeat functional failures resulted in the system not being evaluated for (a)(1) status. If the condition were left uncorrected, the lack of adequate preventive maintenance could result in additional equipment failures. The finding is not suitable for SDP evaluation because the performance failure did not result in degraded equipment. NRC management has reviewed the finding and determined it to be a Green finding of very low significance. The inspectors considered the safety significance of this violation to be low because the performance deficiency did not cause the repeat failures.

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

Barrier Integrity

Significance: SL-IV Apr 21, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

**DELETION OF CONTAINMENT INTEGRITY CONTROLS FOR SECONDARY SYSTEM
CONTAINMENT PENETRATIONS**

IR 050000313-03-02, IR 05000368-03-02; Entergy Operations, Inc.; 12/29/02 - 03/22/03; Arkansas Nuclear One, Units 1 and 2; Evaluations of Changes, Tests, or Experiments; Temporary Plant Modifications; ALARA Planning and Controls. Severity Level IV. The inspectors identified a noncited violation of 10 CFR 50.59 because the licensee failed to identify that changes made to the Units 1 and 2 Updated Safety Analysis Reports required a license amendment request. These changes removed containment isolation valve controls for secondary system containment penetrations. The licensee initiated corrective action on March 28, 2003, to prepare a license amendment request to obtain NRC approval of the changes to the Updated Safety Analysis Reports. This is an item for traditional enforcement because it involves an issue not appropriate for evaluation using the SDP. It involves a violation of 10 CFR 50.59, an issue which impacts NRC oversight ability. The issue is more than minor because it involves a programmatic issue affecting containment controls for all secondary system penetrations. It was considered to be a noncited Severity Level IV violation. Management review determined it was greater than minor because the change should have received NRC review prior to implementation. Redundant containment barrier (system piping) existed and the licensee entered this issue into its corrective action program

Inspection Report# : [2003002\(pdf\)](#)

Emergency Preparedness

Occupational Radiation Safety

Significance:  Feb 20, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

FAILURE TO PROVIDE ADEQUATE JUSTIFICATIONS FOR WORK ACTIVITY DOSE ESTIMATE ADJUSTMENTS

IR 050000313-03-02, IR 05000368-03-02; Entergy Operations, Inc.; 12/29/02 - 03/22/03; Arkansas Nuclear One, Units 1 and 2; Evaluations of Changes, Tests, or Experiments; Temporary Plant Modifications; ALARA Planning and Controls. Green. The inspectors identified a noncited violation of Units 1 and 2 Technical Specifications 5.4.1.a and 6.8.1.a, respectively, because the licensee failed to follow procedural requirements. Specifically, the licensee failed to provide the reason radiation work permits and work activity dose estimates were revised as required by Procedure NMM RP-105, Revision 1, Section 5.8. The inspectors determined that this finding was associated with the Occupational Radiation Safety Cornerstone program and process attributes (ALARA planning/projected dose) and affected the objective of the cornerstone, which is to protect the worker from exposure to radiation. Therefore, the finding was greater than minor. The occurrence involved a failure to maintain or implement, to the extent practical, procedures needed to achieve occupational doses that were ALARA, which resulted in unplanned, unintended occupational collective dose for a work activity. Therefore, the safety significance of the finding was evaluated using the Occupational Radiation Safety SDP. However, because the licensee's 3-year rolling average collective dose was not greater than 135 person-rem/unit, the finding had no more than very low safety significance.

Inspection Report# : [2003002\(pdf\)](#)

Public Radiation Safety

Physical Protection

Significance: N/A Jan 10, 2003

Identified By: NRC

Item Type: FIN Finding

Verification of Compliance With Interim Compensatory Measures Order

On February 25, 2002, the NRC imposed by Order, Interim Compensatory Measures to enhance physical security. The inspectors determined that, overall, the licensee appropriately incorporated the Interim Compensatory Measures into the site protective strategy and access authorization program; developed and implemented relevant procedures; ensured that the emergency plan could be implemented; and established and effectively coordinated interface agreements with offsite organizations.

Inspection Report# : [2003006\(pdf\)](#)

Miscellaneous

Last modified : September 04, 2003