

## Saint Lucie 2 4Q/2003 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:**  Oct 31, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Evaluate Combustible Loading of Silicone Oil-Filled Transformers in the FHA and the Effect on SSD Capability**

A Green non-cited violation (NCV) of 10 CFR 50.48 and St. Lucie Unit 2 Operating License Condition 2.C.(20) was identified for the licensee's failure to comply with the approved fire protection program. Specifically, three transformers, each containing approximately 380 gallons of combustible silicone dielectric insulating fluid, were not identified or evaluated in the Unit 2 fire hazards analysis combustible loading. The three transformers were located in the Train B switchgear room (Fire Area C). As a result, the transformers' contribution to combustible loading, fire ignition frequency, and their effects on safe shutdown capability had not been assessed as required by the Fire Protection Program. This finding was entered into the licensee's corrective action program as Condition Report 03-0637.

The finding is more than minor because it affected the mitigating systems cornerstone objective to ensure the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. The finding is of very low safety significance because postulated fire scenarios indicated that the potential effects of a fire, involving either of the three silicone oil-filled transformers in Fire Area C, would not likely be of sufficient intensity to damage the cables of safe shutdown equipment to the point where it would have an adverse impact on the ability to safely shut down the plant. (Section 1R05.1.b)

Inspection Report# : [2003013\(pdf\)](#)

**Significance:**  Sep 27, 2003

Identified By: Self Disclosing

Item Type: NCV NonCited Violation

#### **Improper Implementation Of Off-Normal Operating Procedure During Loss Of MFW Event**

A self-revealing finding was identified as a non-cited violation of Technical Specification 6.8.1.a for failing to properly implement Off-Normal Operating Procedure (ONOP) 2-0700030, Main Feedwater, during a loss of feedwater event.

This finding is greater than minor because if left uncorrected could result in more significant safety consequences and it also affected an attribute and objective of the Mitigating Systems Cornerstone. Failure to follow an ONOP could affect the capability to mitigate abnormal plant conditions and to prevent undesirable consequences in response to initiating events. The finding is of very low safety significance in accordance with the SDP Phase 1 worksheet because no actual loss of safety function occurred. (Section 1R14)

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

**Significance:**  Mar 28, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

**Cables in Containment Fail to Meet 10 CFR 50, Appendix R, Criterion III.G.2 Requirements**

Green. The inspectors identified a non-cited violation for the licensee's failure to comply with 10 CFR 50, Appendix R, Criterion III.G.2. This finding is related to a lack of spacial separation or barriers to protect cables in containment which could result in spurious opening of the pressurizer power operated relief valve (PORV) during a fire.

This finding is greater than minor because it affected the mitigating systems cornerstone objective of equipment reliability, in that, spurious opening of the PORV during post-fire safe shutdown would adversely affect the ability to achieve and maintain the reactor in a hot shutdown condition. The finding is of very low safety significance because the initiating event likelihood was low, manual fire suppression capability remained unaffected and all mitigating systems except for the PORV and block valve were unaffected. (Section 4OA5)

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

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## Barrier Integrity

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## Emergency Preparedness

**Significance:**  Apr 05, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure To Meet 10 CFR 50.54(q) Change Requirements Which Resulted In A Decrease Of Emergency Plan Effectiveness**

Green. A change made to the Emergency Action Limit (EAL) for Reactor Coolant System (RCS) leakage requiring an Unusual Event declaration resulted in a decrease in the effectiveness of the Emergency Plan.

A non-cited violation of 10 CFR 50.54(q) was identified by the NRC inspector. This finding is greater than minor because changing commitments in the Radiological Emergency Plan (REP) which decrease its effectiveness without prior approval potentially impacts the NRC's ability to perform its regulatory function, and potentially creates an ineffective response to a radiological emergency. The safety significance of the finding is very low because, although the Unusual Event declaration could be delayed as a result of the change made to the EAL, criteria for declaration of an Alert and subsequent response, remained unchanged.

Inspection Report# : [2003004\(pdf\)](#)

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## Occupational Radiation Safety

**Significance:**  Jun 28, 2003

Identified By: Self Disclosing

Item Type: NCV NonCited Violation

**Failure Of A Designated Standby Rescue Person To Maintain Continuous Communication With Worker Provided With Supplied-Air Hood Respiratory Equipment (Section 2OS1.1)**

Green. A self-revealing non-cited violation of 10 CFR 20.1703 (f) was identified for the failure of the designated standby rescue person to maintain continuous communication with a worker provided with supplied-air hood respiratory equipment during reactor head maintenance activities.

This finding is greater than minor because the failure to maintain continuous communication between the worker and the designated rescue person potentially could decrease timeliness in providing assistance to the worker whose air supply failed in this case, or for any other reason that the individual may have required relief from distress. The finding is of very low safety significance because an indirect communication channel was available between the affected worker and the standby rescue person and, following the loss of breathing air event, was used to request appropriate assistance in a timely manner (Section OS1.1).

Inspection Report# : [2003005\(pdf\)](#)

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## Public Radiation Safety

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## Physical Protection

**Significance:**  Jun 28, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure To Search New Fuel Containers Prior To Entering The Protected Area (Section 1R20).**

Green. A non-cited violation was identified for the licensee's failure to comply with Section 3.3.6 of the Physical Security Plan. On March 4, 2003, security personnel allowed a shipment of new fuel containers to enter the Protected Area (PA) without performing an adequate search.

This finding is greater than minor because allowing new fuel storage containers, with inadequate seals, to enter the PA without being searched could have adversely affected the licensee's ability to provide adequate assurance that the physical protection program can protect against the design basis threat of radiological sabotage. This finding was evaluated using the Interim Physical Protection Significance Determination Process and determined to be of very low safety significance. The finding was a vulnerability in the implementation of PA search requirements that did not involve a malevolent act, and there had not been two similar findings in four quarters. (Section 1R20)

Inspection Report# : [2003005\(pdf\)](#)

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## Miscellaneous

Last modified : March 02, 2004