

South Texas 2

4Q/2003 Plant Inspection Findings

Initiating Events

Significance:  Dec 27, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Inappropriate operator response to an event resulted in multiple pressurizer PORV lifts during operations in a water solid condition.

The inspectors identified a noncited violation of Technical Specification 6.8.1.a regarding Regulatory Guide 1.33 required procedure. Licensee procedure "Conduct of Operations," Revision 21, requires, in part, that if the plant does not perform or respond as expected, operations personnel will take conservative action to return the plant to a known condition. On March 26, 2003, operators inappropriately responded to plant conditions making an event more significant because operators did not understand and control the impact of the restoration of power to an instrumentation panel. They also did not understand the interactions between the normal pressurizer controller and the cold overpressure mitigation system. This issue was greater than minor because it affected the Initiating Events Cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown operations, in that operators contributed to initiating this event and making it more significant. The performance deficiency was determined to represent a finding of very low safety significance. This was based on a Phase 1 screening in accordance with Manual Chapter 0609, Appendix G, "Shutdown Operations Significance Determination Process." The major factors in this determination were the continued availability of methods to control reactor coolant system pressure and the short period of time that the cold overpressure mitigation system was nonfunctional.

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

Significance:  Apr 26, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to follow procedures to manage the associated risk consequences of performing on-line maintenance on medium risk ranked plant equipment results in tripping a main FWP

A noncited violation was identified for the failure to manage the associated risk consequences of performing on-line maintenance on medium risk ranked plant equipment without following station procedures for mitigating the risk as prescribed in 10 CFR 50.65(a)(4), maintenance rule. Steam Generator Feedwater Pump 22 tripped while performing minor maintenance to replace a redundant power supply while at power. Weekend shift maintenance and operations crews did not recognize this work as being a medium trip risk evolution and treat it accordingly, resulting in relying on standby equipment and tripping a main feedwater pump. This work should have been characterized as a Medium Risk Evolution and treated in accordance with station procedures. This finding is in the licensee's corrective action program as Condition Report 03-7221. This finding is greater than minor because it affects the initiating events cornerstone by increasing the likelihood of an initiating event (plant transient). If the startup feedwater pump had not started, it may have caused a turbine/reactor trip. The finding is of very low safety significance because other standby equipment operated as required.

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

Significance:  Mar 09, 2003

Identified By: NRC

Item Type: FIN Finding

Operators failed to control reactor coolant system pressure, causing the lifting of a pressurizer power operated relief valve.

A finding was identified relating to operator performance during the safety injection event. Operators became distracted and failed to control reactor coolant system pressure while operating the system in the manual mode, causing the lifting of a pressurizer power-operated relief valve. A human performance problem was identified for inattention to detail in monitoring primary plant pressure and understanding the operation of the master pressure controller, which led to challenging the reactor coolant system barrier integrity. This issue was more than minor because it affected the Initiating Events and Barrier Integrity Cornerstone objectives, which required a Phase 2 evaluation. The human performance issue was determined to have very low safety significance using a Phase 2 Significance Determination Process evaluation by assuming all mitigation equipment remained available, but the initiating event frequency for events which could challenge pressurizer power-operated relief valves increased by a factor of 10, in accordance with Manual Chapter 0609 guidance.

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

Significance:  Mar 09, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate procedures permitting maintaining hot standby plant conditions with the main steam lines isolated without establishing precautions to drain accumulated condensate contributed to an inadvertent

A noncited violation with three examples was identified for three inadequate procedures required by Technical Specification 6.8.1.a and Regulatory Guide 1.33 that permitted maintaining hot standby plant conditions with the main steam lines isolated without establishing precautions to drain accumulated condensate. This contributed to an inadvertent safety injection actuation while initiating decay heat removal from an idle steam line. This violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy (NCV 50-499/2002006-01). This issue was entered in the licensee's corrective action program under Condition Report 03-3694. This violation was more than minor because it affected the Initiating Events Cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions through configuration control of the shutdown equipment alignment. This issue was determined to be of very low safety significance using Appendix G of the Significance Determination Process because it did not challenge defense in depth measures or equipment.

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

Significance:  Mar 01, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Condensate polisher system not within the scope of the Maintenance Rule Program as a system whose failure could cause a reactor trip.

A noncited violation of 10 CFR 50.65 was identified for not including the condensate polisher system within the scope of the Maintenance Rule Program as a system whose failure could cause a reactor trip. Unit 1 tripped on March 1, 2003, when a power supply that was original equipment failed. The power supply had no preventive maintenance item to periodically replace it, even though it controlled condensate flow through the condensate polishers and the condensate system function to automatically bypass the condensate polishers in the event of a high differential pressure condition. This violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy (NCV 50-498/2002006-05). This issue was entered into the licensee's corrective action program under Condition Report 03-1837. This issue screened as Green using Phase 1 of the Significance Determination Process because it

affected only one cornerstone and did not reduce the availability of mitigation equipment. This issue was more than minor because it affected the initiating events cornerstone objective to limit the likelihood of events that upset plant stability due to equipment reliability.

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

Significance:  Feb 20, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to follow procedure contributed to collecting enough nitrogen in the reactor head to displace about 4000 gallons of reactor coolant during shutdown maintenance.

A noncited violation was identified for failure to follow a plant procedure, which contributed to collecting enough nitrogen in the reactor head to displace about 4000 gallons of reactor coolant during shutdown maintenance activities before it was recognized. Plant Operating Procedure OPOP03-ZG-0007, "Plant Cooldown," Revision 36, required the head vent valves to be open in this plant condition to vent gases and prevent them from collecting in the reactor head area. The operators did not fully assess this unusual evolution or apply increased controls, in part because a similar evolution had been successfully performed 2 months earlier. However, the earlier work had not required the head vent path to be isolated. This issue was entered in the licensee's corrective action program under Condition Reports 03-2751 and 03-3443. This issue is greater than minor because it affected the Initiating Events Cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions (inventory control) during shutdown operations due to human performance. This issue is of very low safety significance because operators were monitoring backup level indications which were less sensitive but unaffected by the gas accumulation and because the gas accumulation would have been self-limiting if it had progressed to the pressurizer surge line (a vent path).

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

Mitigating Systems

Significance:  Sep 20, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Ineffective maintenance practices for motor operated valve actuators resulted in failure of a residual heat removal valve actuator.

A non-cited violation of 10 CFR 50, Appendix B, Criterion V, was identified related to ineffective maintenance practices for motor operated valve actuators. Ineffective maintenance practices resulted in the failure of a residual heat removal valve actuator and for numerous similar problems in other valve actuators. Specifically, the licensee failed to implement procedural requirements to develop, perform, track, and close out corrective actions for vendor technical bulletins and advisories. Guidance from a 1989 vendor advisory alerting the licensee to failures of motor operated valve actuators and recommending corrective measures was incorporated into station maintenance procedures without taking action to assure that actuators in the plant were actually corrected.

Inspection Report# : [2003003\(pdf\)](#)

Significance:  Jan 19, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Improper maintenance to mechanism operated cell switch prevented the sequencer to initiate loading.

A noncited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified for failure to have adequate maintenance procedures for mechanism-operated cell switches in circuit breakers. A fault affecting one switchyard bus caused a partial loss of offsite power in each unit. The Unit 1 Train B standby diesel generator started but failed to automatically sequence loads as designed. Maintenance personnel identified that the operating mechanism for the cell switch was out of adjustment, preventing the switch from rotating fully and making full electrical contact that would cause the sequencer to initiate loading. The operating mechanism adjustment was not checked when the breaker was swapped a year earlier, and the misadjustment was sufficiently small that the switch functioned until this actual demand. The inspectors noted that the licensee did not have a maintenance procedure or preventive maintenance item to adjust, lubricate, clean, or fully test any of the mechanism operated cell switches onsite. Failure to procedurally verify the proper adjustment and operation of the motor-operated cell switch following breaker replacement was a violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings." This violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy (NCV 50-498/2002006-03). This issue was entered into the licensee's corrective action program under Condition Report 03-928.

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

Barrier Integrity

Significance:  Mar 22, 2003

Identified By: NRC

Item Type: FIN Finding

Poor maintenance practices associated with foreign material exclusion caused two main steam isolation valves to not fully close as designed.

A finding was identified for poor maintenance practices that caused main steam isolation valves to not fully close as designed. The inspectors determined that the maintenance personnel demonstrated a problem with maintenance effectiveness in that poor system cleanliness practices during maintenance contributed to two main steam isolation valves' inability to operate/isolate as designed. Even though the licensee engineers determined that the valve design limited the amount of possible steam leakage to within analyzed limits for accident analyses, this issue caused the plant to experience a cooldown cycle twice to effect repairs. This issue was considered more than minor because the human performance issue of poor maintenance performance in foreign material control while rebuilding main steam isolation valves affected the barrier integrity cornerstone. The safety significance of this issue was determined to be very low since the valves were capable of limiting steam flow within design requirements and since it screened as Green using a Phase 1 assessment of the Significance Determination Process. This issue is in the licensee's corrective action program under Condition Reports 02-19118, 02-19149, and 03-1325.

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

Significance:  Jan 19, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate procedure for restoring reactor coolant pumps caused a pressurizer power operated relief valve to lift.

A noncited violation was identified for an inadequate procedure. A fault affecting one switchyard bus caused a partial loss of offsite power in each unit. Unit 2 lost power to both running reactor coolant pumps, and when operators attempted to restore them, a pressurizer power operated relief valve lifted. Plant Operating Procedure OPOP02-RC-0004, "Operation of Reactor Coolant Pump," Revision 19, was determined to be inadequate because it contained

prerequisites for starting an initial reactor coolant pump which conflicted with (and caused operators to disregard) precautions to be aware of and limit pressure transients during reactor coolant pump starts. This was considered to be a violation of Technical Specification 6.8.1 and Regulatory Guide 1.33 for an inadequate procedure. Additionally, weaknesses were identified in operator understanding of the impact of their actions on the existing plant conditions and the operation of the pressurizer pressure control system. This violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy (NCV 50-499/2002006-04). This issue was entered into the licensee's corrective action program under Condition Report 03-949. This issue was more than minor because it affected objectives of the barrier integrity and initiating events cornerstones, which required a Phase 2 evaluation. This issue was determined to be of very low safety significance using a Significance Determination Process Phase 2 evaluation. The inspectors assumed that all mitigation equipment remained available, but the initiating events that could challenge a pressurizer power operated relief valve had the frequency of occurrence increased by a factor of 10, in accordance with Manual Chapter 0609 guidance.

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

Emergency Preparedness

Occupational Radiation Safety

Significance:  Apr 04, 2003

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to perform an adequate airborne survey.

An NRC identified noncited violation of 10 CFR 20.1501a was identified because the licensee failed to perform an adequate airborne survey during decontamination activities. Specifically, during a review of surveys, the inspectors identified two examples in which air samplers were not properly positioned to ensure work area airborne radiological conditions were monitored. The failure to appropriately position air samplers to perform a representative airborne survey of a work area is a performance deficiency. The issue was more than minor because it was associated with a cornerstone attribute (program and process) and affected the occupational radiation safety cornerstone objective (to ensure the adequate protection of the worker's health and safety from radiation and radioactive material). The finding involved the failure to control radiological work that was contrary to regulatory requirements. When processed through the Occupational Radiation Safety Significance Determination Process, the finding was found to have very low safety significance because it was not an ALARA issue, there was no overexposure or substantial potential for an overexposure, and the ability to assess dose was not compromised.

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

Public Radiation Safety

Physical Protection

Significance: N/A Mar 13, 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# : [2003005\(pdf\)](#)

Miscellaneous

Significance: N/A Jun 12, 2003

Identified By: NRC

Item Type: FIN Finding

Identification and Resolution of Problems

The licensee's actions to enhance employee protection and reporting of safety concerns were determined to be in compliance with the terms and conditions of the Order. Licensee audits, surveys, and assessments were found to be adequate. A safety conscious work environment at STP was found to be in place, maintained, and accepted by licensee personnel. The inspectors found workers at the site felt free to identify concerns to their supervision and to input safety findings into their corrective action program or Employee Concerns Program without fear of retaliation. The licensee's compliance with the terms and conditions of the Order were verified through direct inspection and documentation reviews.

Inspection Report# : [2003009\(pdf\)](#)

Last modified : March 02, 2004