

## Oconee 3

# 4Q/2006 Plant Inspection Findings

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### Initiating Events

**Significance:**  Jun 30, 2006

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Loss of Unit 3 Offsite Power During Mode 6.**

self-revealing non-cited violation of Technical Specification (TS) 5.4.1 was identified for failure to adequately implement the procedure requirements for protected train equipment, resulting in the lockout of CT3 transformer and subsequent loss of Unit 3 power while in Mode 6.

The inspectors determined that the licensee's failure to adequately implement their procedure for protected train equipment was a performance deficiency. The finding was considered to be more 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. The finding was determined to be of very low safety significance. This was based on the screening criteria found MC 609, Appendix G, Attachment 1, Checklist 4, Pressurized Water Reactor (PWR) Refueling Operation: Reactor Coolant System (RCS) Level > 23' or PWR Shutdown Operation with time to Boil > 2 Hours and Inventory in the Pressurizer. This finding did not meet the criteria in the checklist for requiring a phase 2 or 3 analysis, in that it did not increase the likelihood of a loss of RCS inventory, did not degrade the licensee's ability to terminate a leak path or add inventory, or degrade the licensee's ability to recover Decay Heat Removal (DHR) once it is lost.

This finding has a cross-cutting aspect in the area of human performance because the licensee's planned work activities did not effectively keep personnel apprised of the operational impact of the work due to the inadequate implementation of their protected train procedure. (Section 4OA3)

Inspection Report# : [2006003](#) (*pdf*)

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### Mitigating Systems

**Significance:** **W** Aug 31, 2006

Identified By: NRC

Item Type: VIO Violation

#### **Inadequate Procedural Controls and Risk Management Associated with Breach in SSF Flood Protection Barrier**

Contrary to Technical Specification 5.4.1 and 10 CFR 50.65(a)(4), the licensee failed to use adequate procedures to control maintenance activities (removal of a CO2 access cover from SSF flood barrier to facilitate installation of temporary electrical power cables) that could affect safety-related equipment and therefore failed to assess and manage the increase in risk from external floods for this maintenance activity.

Inspection Report# : [2006017](#) (*pdf*)

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**Significance:**  Jun 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to promptly correct long-standing east penetration room blowout panel-related deficiencies that precluded flood mitigation in the auxiliary building.**

NCV of 10 CFR Part 50, Appendix B, Criteria XVI, Corrective Action, for failure to promptly identify and correct a significant condition adverse to quality. Specifically, as a result of inappropriate east penetration room blowout panel

modifications (identified as a violation in 2002), in conjunction with the inappropriate addition of floor curbing and the inadequate strength of internal doors and block walls (all identified in DEC's corrective action program in 2001), Units 1, 2, and 3 continue to be operated outside their licensing basis with respect to HELB-related flood mitigation in the auxiliary building.

Inspection Report# : [2006014](#) (*pdf*)

**Significance:** SL-IV Jun 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to report east penetration room blowout pante-related deficiencies would prevent fulfillment of the HPI system safety function.**

NCV of 10 CFR 50.73, Part (v) was identified for the failure to report that east penetration room blowout panel-related deficiencies would prevent the fulfillment of the HPI system safety function to mitigate the consequences of a HELB (i.e., to shutdown the reactor and maintain it in a cold shutdown condition).

Inspection Report# : [2006014](#) (*pdf*)

**Significance:**  Jun 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform Adequate Examinations of Letdown Filter Supports.**

The inspectors identified a finding involving a non-cited violation of 10 CFR Part 50.55a(g)(4)ii for failure to perform a visual (VT-3) examination of the letdown filter housing supports as required by Section XI of the ASME Code. The examinations were performed with a remote camera and the required examination coverage was not obtained as required by Section XI of the ASME Code. The limited remote VT-3 examinations found no indications that the structural integrity of the supports was unacceptable for service. The licensee entered this issue into the Corrective Action Program.

This finding was of more than minor significance because the incomplete examination of the letdown filter housing supports, if left uncorrected, could become a more significant structural support concern. In addition, a failure to examine the letdown filter supports as required by the ASME Code is related to the "Equipment Performance" attribute of the "Initiating Events" cornerstone and affects the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown, as well as power operations. This finding was evaluated using Phase 1 of the NRC IMC 0609, "Significance Determination Process (SDP)." This finding was of very low safety significance because the worst case degradation of the letdown filter supports would result in a detectable and isolable RCS leak that would not impair the mitigating function of the high pressure injection (HPI) system. (Section 1R08)

Inspection Report# : [2006003](#) (*pdf*)

**Significance:**  Jun 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure To Maintain Containment Electrical Penetration Enclosures.**

The inspectors identified a non-cited violation of 10 CFR 50 Appendix B, Criterion XVI for failure to identify a condition adverse to quality in that East and West Penetration Room containment electrical penetration enclosures had not been maintained, such that a number of enclosures allowed the introduction of dirt and debris inconsistent with conditions under which these penetrations were environmentally qualified.

The finding was considered to be a performance deficiency in that the licensee failed to maintain the containment electrical penetration covers such that debris was allowed to accumulate in a number of enclosures; thereby, jeopardizing the environmental qualification of safety-related circuits. This finding was considered to be 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 in that, the degraded penetration covers, if left uncorrected could allow the environmental qualification of safety-related circuits to degrade such that they would fail following a high energy line break (HELB) in the east penetration rooms. Using the phase 1 screening worksheet of Manual Chapter 0609, Appendix A, the finding was determined to be of very low safety significance, as it did not result in a loss of operability of any equipment needed to

mitigate the effects of a HELB.

This finding has a cross-cutting aspect in the area of problem identification and resolution, as the licensee did not appropriately identify the degraded penetration covers consistent with their corrective action program. (Section 40A5.1)

Inspection Report# : [2006003](#) (*pdf*)

**Significance:**  Mar 17, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Non-Conservative EOP Procedure Setpoint for Operator Action to accomplish BWST to RBES swap over on Low BWST Level**

The team identified a Green, non-cited violation (NCV) of Technical Specification 5.4.1.b for a non-conservative operator action setpoint in the Emergency Operating Procedures. Specifically, the 6 foot level setpoint for operator action to complete the BWST to Reactor Building Emergency Sump (RBES) swap over by closing the BWST suction valves did not include enough margin to preclude degradation or damage to the pumps due to vortex formation in the BWST in all cases. When the NRC notified the licensee of this condition, the licensee entered it into the corrective action program. This finding is greater than minor because it is associated with the procedure quality attribute of the Mitigating Systems cornerstone and affected the cornerstone objective of ensuring reliable, available, and capable systems that respond to initiating events to prevent undesirable consequences. This finding is of very low safety significance because no actual loss of safety function occurred and operators have been trained to identify loss of pump suction. This finding has been entered into the licensee's corrective action program as PIP O-06-01374. (Section 1R21.2.1.1 )

Inspection Report# : [2006006](#) (*pdf*)

**Significance:**  Feb 15, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Promptly Identify and Correct a Long-Standing Discrepancy Between the Unit 3 Control Room and its Tornado Licensing Basis Specified in the Updated Final Safety Analysis Report**

NCV for failure to promptly identify and correct a long-standing discrepancy between the Unit 3 control room and its tornado licensing basis specified in the Updated Final Safety Analysis Report: (1) a failure to take adequate corrective actions to bring the Unit 3 control room (i.e., north control room wall) within its licensing basis to withstand the effects (wind force, missiles, and differential pressure) of differing tornado intensities; (2) inadequate corrective actions involving the inappropriate use of 50.59 to remove the Unit 3 control room tornado missile requirements from the UFSAR.

Inspection Report# : [2006009](#) (*pdf*)

## Barrier Integrity

**Significance:** SL-IV Mar 31, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Provide Complete and Accurate Information to the NRC**

An in-office review of the results of NRC Office of Investigations (OI) Report No.: 2-2005-016, identified a non-cited violation of 10 CFR 50.9 for failure to provide complete and accurate information in Licensee Event Report (LER) 05000287/2001-001, regarding the condition of the Unit 3 Reactor Pressure Vessel Head (RPVH), resulting from boric acid leakage. The LER stated that boric acid leakage caused no detectable corrosion to the vessel head, when in fact some minor corrosion was identified. The licensee corrected the incomplete and inaccurate information with a revision to LER 05000287/ 2001-001, dated August 18, 2005. Because this issue potentially affected the NRC's ability to perform its

regulatory function, it was evaluated using the traditional enforcement process. The failure to provide accurate and complete information precluded the NRC from being able to pursue or consider further inquiry or inspection activity in regards to RPVH corrosion, the significance of which was not known at the time. NRC review determined that there was no evidence that the licensee's actions were willful. Additionally the NRC determined that the corrosion was not structurally significant and would not have resulted in a regulatory action or substantial further inquiry. (Section 40A5.3)

Inspection Report# : [2006002](#) (*pdf*)

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## **Emergency Preparedness**

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## **Occupational Radiation Safety**

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## **Public Radiation Safety**

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## **Physical Protection**

[Physical Protection](#) information not publicly available.

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## **Miscellaneous**

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