

Pilgrim 1

4Q/2006 Plant Inspection Findings

Initiating Events

Significance:  Apr 02, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to evaluate failed AOG bypass valve contributes to manual reactor scram

The inspectors identified a non-cited violation (NCV) of Technical Specifications for failure to evaluate the impact of an inoperable manual bypass valve (1-HO-154) in the augmented off-gas (AOG) system. Specifically, on January 12 and March 12, 2006, when the bypass valve could not be opened, plant personnel did not initiate a condition report, evaluate the impact on plant operations, and consider the need to establish compensatory measures, contrary to corrective action process procedure requirements. As a result, opportunities to repair the valve were missed and the valve's inoperable condition was not communicated effectively to station management and within operations. Consequently, on March 13 the operating crew was unaware the bypass valve was inoperable and attempted to use the bypass valve to restore dilution steam flow to the recombiner when the controller failed. The inability to restore dilution steam flow led to an increase in recombiner temperature which required the operating crew to initiate a manual reactor scram in accordance with procedure 2.4.141, "Abnormal Recombiner Operatin." Corrective actions, immediate and long-term, are provided for in the root cause evaluation for condition report (CR) 20060977 and CR 20061024.

The finding was determined to be of very low safety significance (Green), when evaluated per the significance determination process of MC-0609, Appendix A. The finding is more than minor because it led to a plant transient. The finding's significance however, was not greater than Green because it did not contribute to both a reactor trip and the likelihood that mitigation equipment or functions would not be available. This finding has a cross cutting aspect in problem identification and resolution which significantly contributed to the performance deficiency because Entergy did not thoroughly evaluate the degraded condition of the manual bypass valve for impact on the plant or appropriate compensatory measures. (Section 1R14)

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

Mitigating Systems

Significance:  Dec 31, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

SL IV NCV for Inadequate 50.59 Evaluation for RFO 15 Emergency Diesel LOCA/LOOP Test Change

The inspector identified a Severity Level IV Non-Cited Violation associated with the licensee's failure to perform an adequate safety evaluation per 10 CFR 50.59. Contrary to 10 CFR 50.59(c)(1)(I), a screening safety evaluation (SE) for surveillance 8.M.3-1 dated March 10, 2005, failed to provide an adequate basis to demonstrate that a change to the technical specifications incorporated in License DPR-35 was not required prior to conducting the Special Test for Automatic ECCS Load Sequencing of Diesels per 8.M.3-1 on April 28, 2005 per Technical Specification 4.9.A.1.b. The licensee entered this issue into the corrective action program as Condition Reports 200503343 and 200604598.

The finding was determined to be more than minor because the inspector determined that the change in test method required NRC prior approval. The conditions associated with the finding (i.e., the failure to include all pumps' motor loads in the integrated ECCS Load Sequence test) were determined to be of very low safety significance because they did not result in the loss of operability of a safety system. Because the issue affected the NRC's ability to perform its regulatory function, this finding was evaluated using the traditional enforcement process and was classified at Severity Level IV because the violation of 10 CFR 50.59 involved conditions evaluated as having very low safety significance by the SDP.

This finding has a cross-cutting aspect in the area of human performance because Entergy did not fully evaluate the licensing basis to develop the 50.59 safety evaluation, and thereby failed to obtain a proposed license amendment pursuant to CFR 50.90 prior to changing the test method.

Inspection Report# : [2006005](#) (*pdf*)

Significance: SL-IV Jul 01, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

The inspector identified a Severity Level IV Non-Cited Violation associated with the failure to perform an adequate safety evaluation as required by 10 CR 50.59.

The inspectors identified a Severity Level IV Non-Cited Violation associated with the failure to perform an adequate safety evaluation per 10 CR 50.59. Contrary to 10 CFR 50.59, a screening safety evaluation for handling of a 35 ton cask in the spent fuel did not provide an adequate basis to demonstrate that the evaluation for use of a heavier cask did not change the evaluation methods approved by the NRC staff in 1985 for the control of heavy loads per NUREG 0612 commitments, as described in the UFSAR and the Pilgrim licensing basis. The finding was determined to be more than minor because the inspectors could not reasonably determine that the proposed cask handling activity would not have required NRC approval without subsequent significant enhancements to the 50.59 safety evaluation. The conditions associated with the finding (i.e., the potential drop of a loaded cask) were determined to be of very low safety significance because they did not result in the loss of operability of a safety system. Because the issue affected the NRC's ability to perform its regulatory function, this finding was dispositioned using the traditional enforcement process and was classified at Severity level IV because the violation of 10 CFR 50.59 involved conditions evaluated as having very low safety significance by the SDP. This finding has a cross cutting aspect of human performance, because Entergy did not fully review the licensing basis to develop the screening safety evaluation for ER05120679 dated 3/24/06, and thereby assure a design document was complete and accurate.

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

Significance:  May 19, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

The team identified a Green non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion III, Design Control.

Entergy used a non-conservative calculation method to determine the critical condensate storage tank (CST) water level which would preclude vortex formation at the suction of the high pressure coolant injection (HPCI) pump. The finding was more than minor because the formation of vortexing at the intake of the HPCI suction line could result in air entrainment, which in turn, could cause pulsating pump flow and/or reduction in pump performance. It was associated with the Mitigating Systems cornerstone attribute of design control and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events. The team reviewed this finding using the Phase 1 SDP worksheet for Mitigating Systems and determined the finding was of very low safety significance (Green), because it did not represent a loss of safety function. (Section 1R21.2.1.1)

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

Significance:  May 19, 2006

Identified By: NRC

Item Type: FIN Finding

The team identified a finding regarding Entergy's operability determination for a HPCI trip solenoid valve failure.

The team identified a finding regarding Entergy's operability determination for a HPCI trip solenoid valve failure. Specifically, Entergy's operability evaluation technical basis did not support the specific technical specification (TS) requirement of ensuring that the HPCI system automatically isolates on a reactor vessel high water level signal. The finding was more than minor because it was associated with the Mitigating Systems cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events. Specifically, Entergy did not ensure HPCI's continued reliability and capability to isolate automatically as designed during reactor vessel high water level conditions. The team reviewed this finding using the Phase 1 SDP worksheet and determined the finding was of very low safety significance (Green), because it did not represent a loss of safety function for greater than its TS allowed outage time. (Section 1R21.2.1.2)

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

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Physical Protection

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

Miscellaneous

Last modified : March 01, 2007