

Three Mile Island 1

1Q/2007 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Dec 31, 2006

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Inattentiveness to Duty by a Shift Manager

A self-revealing violation of Technical Specification 6.8.1 occurred on Sunday, December 11, 2005 at 3:45 AM when the on-duty Operations Shift Manager, a licensed senior reactor operator, was observed by three control room operators to be inattentive to duty in an office in the control room complex. An Office of Investigation (OI) investigation (1-2006-011) was initiated on December 19, 2005 to determine if any willful violations had occurred. The OI investigation concluded that the Shift Manager was inattentive; however, it was not considered an intentional act.

The inattentiveness of the on-duty Shift Manager is a performance deficiency. Traditional enforcement does not apply because the NRC determined that the Shift Manager's actions were neither intentional nor deliberate, the actions did not have the potential for impacting the NRC's ability to perform its regulatory function, and there were no actual safety consequences. The issue is considered more than minor because it affects the Human Performance attribute of the Mitigating Systems cornerstone objective to ensure availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). There is currently no SDP that applies to FFD events. Therefore, this finding is not suitable for SDP evaluation. However it was reviewed by NRC management and is determined to be a finding of very low safety significance in accordance with IMC 0612, Section 05.04 (c).

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

Significance:  Dec 31, 2006

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Failure to Follow FFD Procedures

A self-revealing violation of 10 CFR Part 26, "Fitness For Duty Programs" occurred on Sunday, December 11, 2005 at 3:45 AM when three control room operators failed to follow station procedures and initiate actions to have an inattentive Operations Shift Manager relieved of duty and escorted while in the protected area until Fitness for Duty (FFD) testing could be completed. The control room operators also failed to promptly notify station management. Each of the control room operators had observed the Operations Shift Manager in an inattentive position in an office within the control room complex.

An OI investigation (1-2006-011) was initiated on December 19, 2005 to determine if any willful violations had occurred. The OI investigation concluded that the three licensed operators failed to follow the FFD procedure, but they did not do so in willful violation since they were unaware that operator inattentiveness was a FFD issue.

The failure of the licensed operators to implement the station FFD procedure requirements after observing an inattentive Shift Manager is a performance deficiency. These requirements were not completed or carried out in a timely manner. Traditional enforcement does not apply since it was determined that the actions of the operators were neither intentional nor deliberate, the actions did not have the potential for impacting the NRC's ability to perform its regulatory function, and did not have actual safety consequences. The issue is considered more than minor because it affects the Human Performance attribute of the Mitigating Systems cornerstone objective to ensure availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). There is currently no SDP that applies to FFD events; therefore, the finding was not suitable for SDP evaluation. As a result, the finding was

reviewed by NRC management and it was determined to be of very low risk significance in accordance with IMC 0612 section 05.04 (c). This finding has a cross-cutting aspect in the area of problem identification and resolution for operating experience because AmerGen failed to effectively evaluate and communicate relevant external operating experience in a timely manner to train TMI operators on fatigue related FFD issues.

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

Significance:  Sep 30, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Untimely Corrective Actions for Unreliable BWST Level Alarm Instrument.

The inspectors identified a Green non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion XVI “Corrective Action” for untimely action to correct degraded performance of the borated water storage tank (BWST) low level alarm. Differential pressure instrument DH-DPIS-914 failed six of its last eight calibration tests. The most recent test failure, on July 11, 2006, found the BWST low level alarm instrument to be inoperable. Previous corrective actions were untimely and permitted the BWST low level alarm to remain unreliable for extended periods of time. Actions (i.e., instrument replacement or reduced surveillance interval) to restore instrument reliability were not implemented. Issue reports 523284 and 525514 were initiated to document and correct the problem.

This issue is more than minor because it affected the human performance attribute of the Mitigating Systems cornerstone. Specifically, the unreliable BWST low level alarm reduced the likelihood that operators would successfully perform the risk critical manual decay heat removal suction swap-over function. This, in turn, reduced the reliability of the low pressure recirculation, low pressure injection, and reactor building spray safety functions in response to a design basis loss of coolant accident. Additionally, the inspectors determined station personnel had not implemented the station-wide instrument performance trending program for over 4 years. This finding is of very low safety significance because it did not involve an actual loss of safety function. This finding has a cross-cutting aspect in the area of problem identification & resolution.

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

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Physical Protection

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

Miscellaneous

Last modified : June 01, 2007