

La Salle 1

3Q/2007 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Sep 28, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Periodically Test Keylock Switches

The inspectors identified a finding of very low safety significance and an associated NCV of the LaSalle County Station Facility Operating License associated with the Fire Protection Program for failure to ensure that all necessary testing was identified and performed. Specifically, the licensee failed to periodically test remote-local keylock control switches on the switchgear for the emergency buses which are required to implement a safe shutdown for a plant fire in accordance with the licensee's Safe Shutdown Analysis described in Appendix H, Section H.4 of the Fire Protection Report. This issue was entered into the licensee's corrective action program, and as a compensatory measure, the licensee implemented procedure changes to the safe shutdown procedures that gave direction to manually close a breaker if the breaker failed to close using the remote-local keylock switch. The licensee also successfully tested a portion of the remote-local switches and initiated efforts to determine a schedule for testing of the remaining keylock switches.

The finding was more than minor because the licensee did not ensure the operability and functional performance of the remote-local keylock control switches to perform satisfactorily in service. The finding was of very low safety significance based on the results of a Phase 1 screening completed in accordance with IMC 0609, Appendix F, "Fire Protection Significant Determination Process."

Inspection Report# : [2007009](#) (*pdf*)

Significance:  Sep 28, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Translate Backwash Valve Settings into Procedures

The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," in that, the design bases for the manual backwash valve position values for the Diesel Generator Cooling Water (DGCW) backwash strainers were not

correctly translated into procedures and instructions. Specifically, the manual backwash valve positions derived from flow test surveillance procedures based on hydraulic calculation models were not translated into operations procedures for manual operation of the DGCW strainer backwash valves. This issue was entered into the licensee's corrective action program, and the licensee updated the applicable operating procedure to reflect the correct manual settings for the DGCW strainer backwash valves.

This issue was more than minor because the DGCW backwash valves could be manually opened more than required during a loss of power event, and thus divert some cooling flow from post accident required equipment. The finding was of very low safety significance based on a Phase 1 screening in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations," because on re-evaluation, the design function was maintained.

Inspection Report# : [2007009](#) (*pdf*)

G**Significance:** Sep 28, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Lack of Station Blackout Analysis for RCIC

A finding of very low safety significance was identified by the inspectors associated with a Non-Cited Violation of 10 CFR 50.63, "Loss of All Alternating Current Power." Specifically, the licensee did not have an appropriate analysis to determine the capability of coping with a station blackout, in that, it had no analysis that verified the proper operation of the reactor core isolation cooling (RCIC) turbine at the elevated suppression pool temperatures encountered during a station blackout event. This issue was entered into the licensee's corrective action program. The licensee obtained additional information and performed a preliminary analysis which showed that the RCIC turbine would operate as required.

This finding was more than minor because the licensee did not have an analysis that demonstrated the availability and reliability of the RCIC turbine at the elevated suppression pool temperatures encountered during a station blackout event. The issue was of very low safety significance based on a Phase 1 screening in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situation," because the licensee obtained additional data from the RCIC turbine manufacturer and performed a functionality analysis which demonstrated the pump turbine could operate at heightened suppression pool temperatures.

Inspection Report# : [2007009](#) (*pdf*)**Significance:** SL-IV Sep 28, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Lake Level Instrumentation Removed from Service without 10 CFR 50.59 Evaluation

The inspectors identified an NCV of 10 CFR Part 50.59, "Changes, Tests, and Experiments," which had very low safety significance. Specifically, the licensee failed to complete a 50.59 evaluation for removing main control room lake level instrumentation from service. Although the UFSAR stated that the lake level was continuously monitored in the main control room, the level instrument had not functioned reliably for several years and was removed from the plant maintenance schedule in December 2005. At the time of the inspection, control room monitoring of the lake level was not available. The licensee entered the issue into their corrective action program and initiated more frequent operator rounds as a compensatory measure.

The finding was more than minor because the inspectors could not reasonably determine that this change would not have ultimately required prior approval from the NRC. This finding was categorized as Severity Level IV because the underlying technical issue for the finding was determined to be of very low safety significance based on a Phase 1 screening in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situation."

Inspection Report# : [2007009](#) (*pdf*)**G****Significance:** Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to properly control and execute work during a Unit 1 LPCS Inservice Test

The inspectors identified a finding of very low safety significance during a monthly low pressure core spray (LPCS) pump run on Unit 1. Specifically, operations personnel performing LOS-LP-Q1, "LPCS System Inservice Test," did not exhibit proper work control and execution while performing this test. As such, operations personnel did not conduct an adequate pre-job brief and did not have the required copy of the emergency restoration attachment in the field. In addition, when prompted by the inspector for the emergency restoration procedure, the operators in the field were incorrectly provided with an attachment to a different procedure. A non-cited violation of Technical Specification 5.4.1, "Procedures," was also identified for failure to follow the required precaution steps in the continuous use procedure that specifically require operators in the field to have a copy of the emergency restoration attachment.

The inspectors determined that the finding was more than minor because if left uncorrected the finding could become a more significant safety concern. Specifically, if the licensee continues to perform surveillance tests without the required in-field copies of emergency restoration attachments, in a more complex evolution, the operators might not

be successful in returning a safety significant system back to standby status. However, because the steps provided by the emergency restoration procedure were simple enough that the operators could have returned the LPCS system to standby if need be, the finding was of very low safety significance. This finding is also related to the cross cutting area of Human Performance (work practices) because the licensee did not define and effectively communicate the expectations regarding procedural compliance and the operations personnel did not follow the procedure. Corrective actions by the licensee included coaching and counseling of the operators involved and a next shift communication message to all operators regarding the incident.

Inspection Report# : [2007003](#) (*pdf*)

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Significance: Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Licensee Relied on Operator Manual Actions for Post-fire SSD.

The inspectors identified a non-cited violation (NCV) of the LaSalle County Station Operating License for the failure to establish the required physical protection or separation of cables to ensure that one redundant train of systems necessary to achieve and maintain hot shutdown condition was free of fire damage. The licensee instead relied on operator manual actions for post-fire Safe Shutdown (SSD) in the event of a fire in non-alternate shutdown areas. The manual actions were not identified in the SSD procedures. Since the inspection in 2005, the licensee implemented appropriate procedure changes and incorporated the required manual actions.

The finding was more than minor because it affected the attribute of protection against external factors (i.e., fire) and it impacted the objective of the mitigating systems cornerstone. The failure to ensure that one redundant train of systems necessary to achieve and maintain hot shutdown condition free of fire damage and failure to provide adequate instructions for manual actions in shutdown procedures could have adversely impacted the operators's ability to promptly take appropriate actions and could have complicated safe shutdown in the event of a fire. The finding was of very low safety significance (Green) based on a Phase 1 SDP evaluation completed in accordance with IMC 0609, Appendix F, "Fire Protection Significance Determination Process."

Inspection Report# : [2007003](#) (*pdf*)

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Significance: Mar 31, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Incomplete Residual Heat Removal Heat Exchanger Vessel Weld Examinations.

The inspectors identified a finding of very low safety significance and an associated non-cited violation of 10 CFR 50.55a(g)4 for the licensee's failure to perform examinations of the ASME Code Section XI required weld volume for the Unit 1 and 2 'B' residual heat removal (RHR) heat exchanger shell welds. Specifically, the licensee completed only ? of the Code required weld examination volume for four shell welds on each heat exchanger vessel. The performance deficiency associated with this finding was the failure of the licensee to complete a full volumetric examination of the 1B and 2B RHR heat exchanger shell welds. This finding was of more than minor significance because it directly affected the Mitigating System Cornerstone objective of equipment performance (reliability). Because the finding did not represent a design or qualification deficiency that resulted in the loss of operability the inspectors concluded that it was of very low safety significance and within the licensee's response band. In addition, the inspectors also determined that the finding was related primarily to the cross-cutting area of Human Performance, since the licensee failed to ensure supervisory and management oversight of work activities, including contractors, such that nuclear safety was supported. Corrective actions planned and completed by the licensee included repeating the 'B' RHR heat exchanger shell weld examinations to ensure the required Code volume was covered.

Inspection Report# : [2007002](#) (*pdf*)

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Significance: Dec 31, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

Operator Manual Actions For Maintaining EDG Availability During Surveillance Testing Not Adequately Implemented, as Required by 10 CFR 50.65(a)(4)

A finding of very low safety significance was identified by inspectors during observation of a scheduled 1A emergency diesel generator (EDG) fast start surveillance. Specifically, the inspectors identified that the licensee's

manual operator actions in place to ensure EDG availability during the surveillance testing did not meet the requirements of NUMARC 93-01, Section 11. A non-cited violation of 10 CFR 50.65(a)(4) was also identified for failure to adequately assess and manage the increase in risk that result from the proposed activity.

The performance deficiency identified was associated with the licensee's planning and use of operator manual actions to ensure EDG availability during surveillance testing. Specifically, the licensee's manual restoration actions intended to maintain EDG availability during the surveillance test were not properly captured in written instructions or the licensee's procedures. In addition, the inspectors determined that diagnosis by the on-watch operations crew would have been required to successfully restore the EDG in the event of an emergency start demand. The finding was of more than minor significance in that the licensee failed to adequately implement and manage risk compensatory measures (i.e., the use of operator manual actions to ensure component availability) associated with the EDG surveillance activity. Because the Risk Deficit for the finding was calculated to have been significantly less than 1E-6, the inspectors concluded that the finding was of very low safety significance (Green) and within the licensee's response band. Corrective actions planned and completed by the licensee included a review of all procedural uses of operator manual actions to ensure component availability during testing to ensure that adequate written restoration instructions exist, as well as other NUMARC 93-01, Section 11, requirements.

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

Barrier Integrity

Significance:  May 18, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Procedure for Removal of Drywell Head Bolts

Green. The inspectors identified a finding having very low safety significance and an associated NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," involving an inadequate maintenance procedure used to remove drywell head bolts. Specifically, in maintenance procedure MA-AB-756-600 "Reactor Disassembly," the licensee failed to provide instructions to remove only "every other bolt" to ensure that the drywell head assembly configuration remained within the analyzed configuration for operating Modes 1 through 3. As a corrective action, the licensee intended to provide additional procedure instructions to restrict bolt removal to every other bolt, or delete the procedure option for early bolt removal with the plant in Modes 1 through 3.

The finding was determined to be greater than minor because absent NRC intervention the inadequate procedure could lead to a more significant problem. Specifically, procedure MA-AB-756-600 would have allowed removal of bolts from adjacent locations on the drywell head assembly which could affect the structural and/or leakage integrity of the containment. The finding was of very low safety significance based on a Phase 1 screening in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations," because it did not represent an actual open pathway for containment, and did not involve a reduction in defense in depth for the atmospheric control or hydrogen control function of containment. The primary cause of this finding was related to the cross-cutting area of human performance because the licensee did not provide complete, accurate, and up to date design documentation to plant personnel. (Section 1R17)

Inspection Report# : [2007007](#) (*pdf*)

Significance:  May 18, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Lack of Calibrated Air Wrench ofor Drywell Head Assembly Bolt Installation

Green. The inspectors identified a finding having very low safety significance and an associated NCV of 10 CFR Part 50, Appendix B, Criterion XII, "Control of Measuring and Test Equipment," involving lack of calibrated tools used to establish torque for the drywell head assembly bolts. Specifically, for five air hammer wrenches used to install drywell head assembly bolts on Unit 1 and Unit 2, the licensee failed to ensure these tools were properly calibrated to confirm the accuracy of the torque applied. The licensee entered this issue into the corrective action program,

performed an operability evaluation, and concluded that sufficient torque had been applied to the drywell head bolts. The licensee operability conclusion was based upon the vendor advertised torque wrench specifications, torque margins available in the design analysis, and periodic air hammer wrench maintenance.

The finding was determined to be greater than minor because absent NRC intervention the lack of calibration testing for these wrenches could lead to a more significant problem. Specifically, the drywell head assembly bolts may not receive sufficient torque to establish a preload which assures containment leakage and structural integrity. The finding was of very low safety significance based on a Phase 1 screening in accordance with IMC 0609, Appendix A, "Significance Determination of Reactor Inspection Findings for At-Power Situations," because it did not represent an actual open pathway for containment, and did not involve a reduction in defense in depth for the atmospheric control or hydrogen control function of containment. This finding had a cross-cutting aspect in the area of human performance because the licensee did not provide adequate and available facilities and equipment (e.g. calibrated equipment) for personnel reassembling the drywell head. (Section 1R17)

Inspection Report# : [2007007](#) (*pdf*)

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Significance:  Sep 30, 2007

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

External Radiation Levels on Package Exceeds 200 mrem/hr on Contact

A self-revealing NCV of 10 CFR 71.5 was identified when a package of licensed material offered for shipment exceeded the external radiation limit contained in 49 CFR 173. The shipment was surveyed upon receipt at the final destination by individuals qualified in radioactive materials package receipt and the radiation levels at the package surface were in excess of 200 millirem (mrem)/hr. As a result of this event, the licensee changed the shipping procedure to require that all items placed in the package be surveyed prior to closure, survey and shipment.

The cause of the error was a failure to assure that all package contents were properly surveyed and secured so they could not shift and create a change in radiation field during transport. The finding, under the Public Radiation Safety Cornerstone, does not involve the application of traditional enforcement. The finding was more than minor as it involves an occurrence in the licensee's radioactive material transportation program that is contrary to NRC or Department of Transportation (DOT) regulations and is a key attribute under the objective of the radiation safety cornerstone to ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain, as a result of routine civilian nuclear reactor operation. Although the limits for external radiation levels on a package were exceeded, the finding is of very low safety significance because the area of the package having the higher external radiation levels would not have been accessible to a member of the public. The inspectors determined that the finding had a cross-cutting aspect associated with problem identification and resolution, in that the licensee did not implement and institutionalize operating experience through changes to procedures (Aspect P.2(b)).

Inspection Report# : [2007004](#) (*pdf*)

Physical Protection

Although the NRC is actively overseeing the Security cornerstone, the Commission has decided that certain findings pertaining to security cornerstone will not be publicly available to ensure that potentially useful information is not provided to a possible adversary. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

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