

# Turkey Point 3

## 3Q/2007 Plant Inspection Findings

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### Initiating Events

**Significance:**  Dec 31, 2006

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Comply with Core Alteration Procedures for Handling of Irradiated Fuel**

The inspectors identified a Green non-cited violation of Technical Specification 6.8.1 for failure to implement procedures during core alterations when operators failed to maintain reliable communications and to place irradiated fuel in a safe storage location when communications were lost between the refueling personnel and the control room. When identified to the licensee, the issue was entered into the corrective action program and actions to brief fuel handling personnel on procedure requirements were taken prior to resuming fuel movement.

The finding was more than minor because technical specification requirements to implement core alterations procedures were not being met. Using the NRC Manual Chapter 0609, Attachment 1, Checklist 4, a Phase 2 analysis was not required (conditions not met) and the finding was determined to be of very low safety significance. The Initiating Events cornerstone was affected because reliable communications and placement of the irradiated fuel assembly in a safe location on loss of communications would permit prompt protection of personnel and emergency response should a loss of the refueling water seal occur. The finding affects the cross cutting area of Human Performance - Work Practices because the licensee had not defined and effectively communicated expectations regarding procedural compliance and personnel did not follow procedures. (Section 1R20)

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

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### Mitigating Systems

**Significance:**  Sep 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Perform Required ASME Code Section XI Leakage Testing**

The inspectors identified a non-cited violation (NCV) of 10 CFR 50.55a(g)(4) for the failure to perform periodic leakage testing of buried piping portions of the Intake Cooling Water system as required by Section XI of the ASME Code for the third 10-year Inservice Inspection interval for Units 3 and 4. The licensee entered this issue into their corrective action program for resolution.

This finding is more than minor because it affects the Equipment Performance attribute of the Mitigating Systems cornerstone objective of ensuring availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. This finding is of very low safety significance because it was not a design issue resulting in a loss of operability, did not represent an actual loss of a system's safety function, did not result in exceeding a technical specification (TS) allowed outage time, and did not affect external event mitigation. The inspectors determined that this finding had no cross-cutting aspect. (Section 1R08)

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

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**Significance:**  Sep 30, 2007

Identified By: NRC

Item Type: FIN Finding

### **Recurring Problems with Alternate Shutdown Communication Equipment**

The inspectors identified a finding when the licensee did not identify and correct an adverse trend of recurring problems with the alternate shutdown communications system. When identified, the licensee entered the issue into the corrective actions program and initiated a review of reliability issues with the communications equipment.

The finding is more than minor because it affects the availability and reliability of the communications system used by plant operators to mitigate certain fire scenarios. The issue was of very low safety significance because an alternate communications system (radios) was available, if needed. The cause was related to the cross-cutting area of problem identification and resolution because the adverse trend of problems with alternate shutdown communications had not been identified nor corrected by the licensee commensurate with its safety significance. (IMC 305, P.1 (d)) (4OA2)  
Inspection Report# : [2007004](#) (*pdf*)

**Significance:**  Sep 30, 2007

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **Failure to Appropriately Procure Replacement Parts Leads to Reactor Shutdown**

A self-revealing NCV of 10 CFR 50, Appendix B, Criterion IV, Procurement Document Control, was identified for improper inserts having been procured and installed in the Unit 3 and Unit 4 rod position circuitry. The inserts were not qualified for the reactor environment and sequentially failed, causing loss of multiple rod position circuits on Unit 3 requiring reactor shutdown. When identified, the affected electrical connectors were replaced with qualified splices. The licensee entered this issue into their corrective action program for resolution.

The failure is more than minor because the reliability of the mitigating rod position indication system is affected. The finding was of very low safety significance because redundant measures of assuring plant shutdown and control using boration were available. The inspector determined that this finding had no cross-cutting aspect. (4OA3)  
Inspection Report# : [2007004](#) (*pdf*)

**Significance:**  Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Maintain Design of Valves Important to Safety**

The inspectors identified a non-cited violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, for failure of the licensee to promptly identify and correct the nonconformance of equipment important to safety, specifically the operation of air solenoids in the charging system outside the design maximum operating differential pressure (MOPD). When identified, the licensee scheduled repair/replacement of the solenoids.

The finding was more than minor because it affected the equipment performance attribute of the Mitigating Systems cornerstone objective to ensure reliability of systems that respond to initiating events to prevent undesirable consequences. The finding screened as Green using NRC Inspection Manual Chapter (MC) 0609, Appendix A, because it represented a design deficiency that had not been evaluated but did not result in any loss of function. The cause of the finding is related to the cross-cutting area of Human Performance, specifically Resources because the licensee did not minimize long-standing equipment issues and ensure maintenance backlogs were low enough to support safety, (MC 0305 aspect H.2(a)).  
Inspection Report# : [2007003](#) (*pdf*)

**Significance:**  Jun 08, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Initiate Condition Reports for Conditions Adverse to Quality as Required by Procedure**

The inspectors identified a Green non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion V, Instructions, Procedure, and Drawings. Specifically, the inspectors identified several conditions adverse to quality where the licensee failed to initiate condition reports as required by procedure. The licensee entered this issue into the corrective action program.

This finding is greater than minor because, if left uncorrected, the issue would become a more significant safety

concern involving programmatic and equipment issues. In addition, the inspectors determined that the Mitigating Systems Cornerstone attribute of equipment performance to ensure the availability and reliability systems that respond to initiating events to prevent undesirable consequences was adversely affected. The inspectors determined that the finding was not suitable for SDP evaluation because the failure to initiate the condition reports did not directly result in degraded or inoperable equipment. Therefore, this finding was reviewed by Regional Management, in accordance with IMC 0612 Section 05.04c, and determined to be of very low safety significance. The cause of the finding is related to the cross-cutting element of problem identification and resolution. [Section 4OA2.a(3)(I)]

Inspection Report# : [2007008](#) (*pdf*)

**Significance:**  Jun 08, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Prevent Recurring Scaffolding Installation Deficiencies**

The inspectors identified a Green non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action. Specifically, the licensee failed to implement effective corrective actions to prevent recurring deficiencies associated with the erection of scaffolding near safety-related equipment. The licensee entered this issue into the corrective action program.

This finding is more than minor because it is associated with the mitigating system cornerstone attributes of protection against external factors such as a seismic events, and equipment performance such as availability and reliability. The finding is of very low safety significance because the finding was not a design or qualification deficiency, did not represent a loss of safety function, and did not render equipment inoperable due to a seismic event. The cause of the finding is related to the cross-cutting element of problem identification and resolution. [Section 4OA2.a(3)(iii)]

Inspection Report# : [2007008](#) (*pdf*)

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## **Barrier Integrity**

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## **Emergency Preparedness**

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## **Occupational Radiation Safety**

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## **Public Radiation Safety**

**Significance:**  Sep 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Include an Accurate Emergency Response Telephone Number on Radioactive Waste Shipping Papers**

The inspectors identified a finding when the licensee did not identify and correct an adverse trend of recurring problems with the alternate shutdown communications system. When identified, the licensee entered the issue into the corrective actions program and initiated a review of reliability issues with the communications equipment.

The finding is more than minor because it affects the availability and reliability of the communications system used by plant operators to mitigate certain fire scenarios. The issue was of very low safety significance because an alternate communications system (radios) was available, if needed. The cause was related to the cross-cutting area of problem

identification and resolution because the adverse trend of problems with alternate shutdown communications had not been identified nor corrected by the licensee commensurate with its safety significance. (IMC 305, P.1 (d)) (4OA2)  
Inspection Report# : [2007004](#) (*pdf*)

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## 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.

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## Miscellaneous

**Significance:** SL-IV Sep 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

### **Inappropriate Blanket Overtime Authorization**

The inspectors identified a non-cited, SL IV violation of TS 6.8.5 when inappropriate blanket overtime was authorized for thirty-eight electrical maintenance personnel for the entire Unit 3 fall 2007 refueling outage. This issue was promptly discussed with licensee management, the authorization was rescinded, and action was taken by the licensee to manage overtime in accordance with the technical specification requirements. The licensee entered this issue into their corrective action program for resolution.

This finding was evaluated using traditional enforcement since it impacted the regulatory process in that the non-compliance with technical specifications was authorized at an executive level, which could become a more significant safety concern. This finding is of very low safety significance because there were no actual adverse plant or equipment conditions attributed to worker fatigue. (Section 1R20)

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

Last modified : December 07, 2007