

Crystal River 3

1Q/2008 Plant Inspection Findings

Initiating Events

Significance:  Oct 29, 2007

Identified By: NRC

Item Type: FIN Finding

Failure to Implement Adequate Equipment Protection Resulted in a Plant Transient

A self-revealing finding was identified for failure to prevent inadvertent bumping of the condensate pump control switch during maintenance activities. As a result of bumping the control switch, a condensate pump had to be secured and reactor power was rapidly reduced to 61 percent to prevent a reactor trip. Corrective actions included removing the control switch handle to prevent it from being bumped.

The finding was more than minor since it affected the equipment performance attribute of the Initiating Events Cornerstone and affected the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenged critical safety functions. The inspectors referenced Inspection manual Chapter 0609.04, Significance Determination process (SDP), Phase 1 screening and determined the finding to be of very low safety significance (Green) because the finding did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available. A contributing cause of this finding is related to the crosscutting area of human performance, with a work control component. Specifically, the licensee did not adequately plan work activities to protect the condensate pump control switch from being bumped.

Inspection Report# : [2008002](#) (*pdf*)

Mitigating Systems

Significance:  Feb 22, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Inoperable Fire Penetration Seal

The inspectors identified a Green non-cited violation (NCV) of Crystal River Unit 3 Operating License Condition 2.C (9), Fire Protection Program. The NCV was associated with an inoperable fire penetration seal in the 3-hour fire rated ceiling of the makeup system valve alley. The licensee declared the penetration seal inoperable. Corrective actions included establishing an hourly fire watch and repairing the penetration to its designed condition.

The finding adversely affected the fire confinement capability defense-in-depth element. The finding is greater than minor because it is associated with the protection against external factors attribute, i.e., fire, and degraded the mitigating systems cornerstone objective to ensure the availability of systems that respond to initiating events. Using NRC Inspection Manual Chapter (IMC) 0609, Appendix F, Fire Protection Significance Determination Process, the finding was determined to have a very low safety significance since the gap in the fire penetration seal was small (less than 1/8 inch in width).

Inspection Report# : [2008002](#) (*pdf*)

Significance:  Dec 31, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Procedural Guidance Associated with Removal of Containment Debris

The inspectors identified a non-cited violation (NCV) of Improved Technical Specification 5.6.1.1.a, for failure to adequately implement procedures required by Regulatory Guide 1.33, Appendix A, Section 3, Procedures for Startup,

Operation, and Shutdown of Safety-Related PWR Systems. Specifically, the licensee failed to verify no latent debris was present in containment that could impact the emergency core cooling system (ECCS) sump. Corrective actions completed include: removal of the debris identified by the inspectors and performing additional inspection and cleaning of containment.

The finding is more than minor because it could be reasonably viewed as a precursor to a significant event involving debris accumulation on the containment sump screens which could cause impairment to ECCS recirculation flow during a design basis loss of coolant accident. The inspectors referenced Inspection Manual Chapter 0609, Significance Determination Process (SDP), Phase 1 screening and determined the finding to be of very low safety significance. Although the debris impacted the mitigating system cornerstone, it was unlikely to have resulted in an actual loss of safety function and was not potentially risk significant due to possible external events. A contributing cause of this finding is related to the crosscutting area of Human Performance, specifically Work Practices in that the licensee did not adequately comply with a containment inspection procedure. (IMC 305, H.4(b))

Inspection Report# : [2007005](#) (pdf)

Significance:  Oct 05, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Violation of Technical Specification 5.6.1 for Failure to Implement an Adequate Procedure for Manual Starting of the Control Complex Chilled Water Chiller Units (CHHE-1A/1B) Following a LBLOCA

The inspectors identified a finding of very low safety significance involving a violation of Technical Specifications (TS) 5.6.1 for failure to implement an adequate procedure for manual starting of the Control Complex Chilled Water Chiller Units (CHHE-1A/1B) following a Large Break Loss of Coolant Accident (LBLOCA). The chiller units are required to be restarted prior to 127 minutes after the accident to ensure adequate cooling to components within the control complex.

This finding is more than minor because it affects the Procedure Quality attribute of the Mitigating Systems Cornerstone. It impacts the cornerstone objective of ensuring the availability, reliability, and operability of CHHE-1A/1B to perform the intended safety function during a design basis event. The vendor for CHHE-1A/1B provided a maximum temperature for restarting the chiller units of 104 degrees Fahrenheit (°F). The basis for this limitation is to prevent an inadvertent chiller unit trip due to high chiller freon condenser pressure. The inspectors assessed the finding using the SDP and determined that the finding was of very low safety significance (Green) because the inspectors found that Nuclear Services Closed Cycle Cooling (SW) temperature falls below 104 °F no later than 84 minutes after a LBLOCA. This affords operators at least 40 minutes to successfully restart the chiller units. This issue is documented in the corrective action program as nuclear condition report (NCR) 247908. This finding was reviewed for cross-cutting aspects and none were identified.(Section 1R21.2.3

Inspection Report# : [2007006](#) (pdf)

Significance:  Oct 05, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Violation of 10 CFR 50, Appendix B, Criterion XI for Failure to Account for Instrument Uncertainty During EFP-2 Testing

The inspectors identified a finding of very low safety significance involving a violation of 10 CFR 50, Appendix B, Criterion XI, Test Control, for failure to implement a test program which accounted for the effects of instrument uncertainty on surveillance testing of Emergency Feedwater Pump (EFP)-2 in accordance with the approved In-service Testing (IST) program.

This finding is more than minor because it affects the Procedure Quality attribute of the Mitigating Systems Cornerstone. It impacts the cornerstone objective of ensuring the availability, reliability, and operability of EFP-2 to perform the intended safety function during a design basis event. The inspectors assessed the finding using the SDP and determined that the finding was of very low safety significance (Green) because the inspectors found no documented history of in-service failures of EFP-2 rendering safety-related equipment inoperative. This issue is documented in the corrective actions program as NCR 248036. This finding was reviewed for cross-cutting aspects and none were identified. (Section 1R21.2.7)

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Significance: Jun 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Establish Preventative Maintenance Procedures for Hydrostatic Seals Necessary to Protect Safety-Related Equipment from Internal Flooding

The inspectors identified a non-cited violation (NCV) of Improved Technical Specification 5.6.1.1.a, for failure to adequately establish and implement procedures required by Regulatory Guide 1.33, Appendix A, Section 9, Procedures for Performing Maintenance (PM). Specifically, no procedure, program or process existed to periodically inspect hydrostatic barriers to identify and repair any degradation of the seals which provide protection of safety-related equipment from internal flooding. Corrective actions completed or planned include: Repair and qualify applicable fire seals as hydrostatic barriers and establish a hydrostatic penetration seal preventative maintenance program.

The finding is more than minor because it affected the protection against external factors (i.e. flood hazard) attribute of the Mitigating System cornerstone and could have impacted the availability of mitigating equipment during an internal flood event if left uncorrected. The inspectors determined that several degraded fire barrier seals did not meet hydrostatic barrier acceptability requirements. The finding was assessed through the SDP Phase 1 screening and determined to be of very low safety significance since the as-found condition of the hydrostatic barriers would not have resulted in the loss or degradation of safety-related mitigating equipment in the event of an internal flood.

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

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

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