

Turkey Point 4

1Q/2008 Plant Inspection Findings

Initiating Events

Significance:  Dec 31, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to implement the fire protection program: unapproved transient combustibles in the cable spreading room

The inspectors identified a Non-Cited violation for failure to implement the fire protection program when unapproved transient combustibles (including an ignition source) were found in the cable spreading room without the required evaluation. When identified to the licensee either the materials were removed or an appropriate evaluation was done and a permit issued.

The finding was more than minor because it involved the degradation of a fire protection program component to control combustibles and initiation sources introduced into the cable spreading room. The issue was of very low safety significance because the overall fire loading increase in the affected area was small and would not affect the cable spreading room barrier three-hour fire rating. The cause was related to the cross-cutting area of Human Performance, Work Practices (IMC 0305, H.4.b) because the work groups, operators doing rounds, and fire protection personnel did not communicate expectations regarding procedural compliance and personnel did not follow procedures. (1RO5)

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

Significance:  Dec 31, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to periodically update the FSAR with changes made to the cable spreading room fire loading

The inspectors identified a Non-Cited violation for failure to update the final safety analysis report (FSAR) regarding fire loading of permanently installed equipment in the cable spreading room to assure that the information included in the FSAR is the latest information developed. When identified to the licensee, actions were initiated to identify and document changes to the cable spreading room fire loading.

The failure to update the FSAR with information that could affect fire loading of the cable spreading room was a failure to provide accurate information that could impact the NRC ability to perform its regulatory function and was subject to traditional enforcement. (1R17)

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

Mitigating Systems

Significance:  Mar 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to implement procedures regarding overtime hours for plant operations personnel

The inspectors identified a Non-cited violation of Technical Specification (TS) 6.8.5 for the failure of the licensee to properly implement procedure requirements regarding the control of overtime for operations personnel that may perform safety-related duties. To address this issue the licensee has revised the operations shift scheduling to reduce or eliminate the need for overtime beyond the limits specified in licensee procedures.

The finding is greater than minor in accordance with Inspection Manual Chapter (IMC) 0612, Power Reactor Inspection Reports, "Appendix B, Issue Screening." If left uncorrected, the excessive work hours could adversely affect the station's defense-in-depth and increase the likelihood of human errors during response to plant events and would become a more significant safety concern. The failure to implement requirements for controlling the use of overtime is contrary to TS and is a performance deficiency which could adversely the impact operability to monitor safe operation of the plant and other onsite activities. This issue has a cross-cutting aspect in the area of Human Performance, Resources (Item H.2.(c) of IMC 0305, because sufficient qualified personnel were not available to maintain working hours within working hour guidelines.

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

Significance:  Dec 31, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to correct moisture buildup in alternate shutdown panel results in degraded cooldown capability

The inspectors identified a finding when the licensee failed to evaluate excessive moisture and condensation in the Unit 3 alternate shutdown panel. During subsequent testing, all channels of steam generator pressure indication at the panel were inoperable causing a degraded ability to achieve cold shutdown in some fire scenarios. When identified to the licensee, the issue was entered into the corrective action program and moisture intrusion in the panel was stopped by sealing the water source.

The licensee's failure to identify and correct moisture intrusion problems with the remote shutdown equipment was a noncompliance with the licensee's corrective actions procedure. The finding was more than minor because it affected the availability and reliability of the alternate shutdown system designated for use in licensee procedure 0-ONOP-105, Control Room Evacuation. The finding was of very low safety significance because only the ability to achieve cold shutdown was affected by the moisture. The cause of the finding is related to the cross-cutting area of problem identification and resolution because the moisture intrusion in the alternate shutdown system had not been thoroughly evaluated such that the resolutions addressed the causes (IMC 305, P.1.c). (1R15)

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

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 \(pdf\)](#)

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 30, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Implement Design Controls in a Modification

The inspectors identified a non-cited violation of 10 CFR 50, Appendix B, Criterion V, Procedures, for failure of the licensee to implement design controls when a wooden and wire structure was installed in the Unit 4 480 volt switchgear room. When identified to the licensee, the structure was removed and the issue was entered into the corrective action program.

The finding was more than minor because the licensee did not complete an engineering evaluation of the modification and routine operator and management tours of the area did not identify the alteration as inappropriate. The finding screened as Green using NRC Inspection Manual Chapter 0609, Appendix A, because it represented a design or qualification 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 Work Practices because the licensee did not assure proper documentation of activities (MC 0305 aspect H.4(a)).

G

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 40A2.a(3)(I)]

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

G

Significance: Jun 08, 2007

Identified By: NRC

Item Type: NCV NonCited Violation

Corrective Actions Associated with Water Intrusion Trends Were Not Taken in a Timely Manner

The inspectors identified a Green non-cited violation (NCV) of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action. Specifically, the licensee failed to promptly correct a previously identified water intrusion trend which resulted in the failure of a safety-related component. The licensee entered this issue into the corrective action program.

This finding is more than minor because it is associated with the equipment performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding is of very low safety significance because the finding was not a design or qualification deficiency, and did not represent a loss of safety function because the redundant train was available. The cause of the finding is related to the cross-cutting element of problem identification and resolution. [Section 40A2.a(3)(ii)]

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

G

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 40A2.a(3)(iii)]

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

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

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 an NCV of 10 CFR Part 71.5(a)(1)(v) for the failure of the licensee to follow Department of Transportation (DOT) regulations found in 49 CFR Part 172.201(d) which require shipping papers associated with the transport of radioactive material to contain an emergency response telephone number. All radioactive waste shipments made from November 2006 until September 2007 had an incorrect emergency response phone number listed on the official shipping papers. The licensee entered the issue into the corrective action program under condition report (CR) Number 2007-28133 and intended to correct future shipping papers.

The finding is more than minor because it is associated with the Public Radiation Safety cornerstone attribute and adversely affects the cornerstone objective of ensuring adequate protection of public health and safety from exposure to radioactive materials released into the public domain. Based on the facts that emergency response recommendations required by 49 CFR Part 172.602 were included in the paperwork package for each shipment and that there were no accidents on public roadways that would have required the use of the emergency response phone number, the finding was determined to be of very low safety significance (Green). This finding has a crosscutting area of human performance with work practices aspect (IMC 305, H.4 (a)), because the incorrect emergency response phone number was the result of a transposition error which was not prevented by the use of self and peer checking human error prevention techniques. (Section 2PS2)

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

Significance: N/A Mar 21, 2008

Identified By: NRC

Item Type: FIN Finding

PI&R Inspection

The licensee was generally effective at identifying problems and initiating condition reports (CR) as required by program procedures. The inspectors determined that the licensee utilized their corrective action program to evaluate, assign corrective actions, and identify adverse trends, including low level issues. The inspectors reviewed the licensee's corrective action program improvement plan and actions to address evaluation quality, timeliness, and overall corrective action program (CAP) effectiveness. In general, the inspectors found the evaluations to be adequate with notable reductions in the CR backlog and evaluation timeliness since the last problem identification and resolution (PI&R) inspection completed in December 2007. The inspectors identified some minor deficiencies associated with corrective actions to prevent recurrence (CAPR) put in place to address the substantive PI&R cross-cutting issue, first identified in 2006 but overall, corrective actions were effective.

On the basis of interviews conducted during the inspection, a review of the Employee Concerns Program, and the results of the licensee's safety conscious work environment (SCWE) surveys, the inspectors determined that employees felt free to raise concerns without fear of retaliation.

Inspection Report# : [2008007](#) (*pdf*)

Significance: N/A Dec 21, 2007

Identified By: NRC

Item Type: FIN Finding

PI&R Inspection

The licensee was generally effective at identifying problems and initiating condition reports (CR) as required by program procedures. The inspectors determined that the licensee utilized their corrective action program to evaluate, assign corrective actions, and identify adverse trends, including low level issues. In most instances, the licensee properly assigned, prioritized, and evaluated issues identified at the site. The inspectors reviewed the licensee's corrective action program improvement plan and actions to address evaluation quality, timeliness, and overall CAP effectiveness. In general, the inspectors found the evaluations to be adequate with the CR backlog and evaluation timeliness having been reduced since the last problem identification and resolution (PI&R) inspection completed in June 2007. Overall, corrective actions were effective, but the inspectors identified a number of weaknesses associated with corrective actions to prevent recurrence (CAPR) put in place to address the substantive PI&R cross-cutting issue, first identified in 2006. The inspectors identified several examples where corrective actions to prevent recurrence had not been fully implemented and contract engineers had not completed training requirements to perform certain condition report evaluations.

Licensee self-assessments and audits were self-critical and generally effective in identifying problems which were properly documented in their CAP. On the basis of interviews conducted during the inspection, and the results of the licensee's safety conscious work environment (SCWE) surveys the inspectors determined that those employees felt free to raise concerns without fear of retaliation.

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

Last modified : June 05, 2008