

# Davis-Besse

## 1Q/2009 Plant Inspection Findings

---

### Initiating Events

**Significance:**  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

#### **SWITCHYARD TRANSFORMERS RETURNED TO MAINTENANCE RULE A.2 STATUS WITHOUT APPROPRIATE CORRECTIVE ACTIONS COMPLETED**

The inspectors identified a non-cited violation (NCV) of 10 CFR 50.65(a)(1), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," because the licensee did not establish appropriate corrective actions to address the potential for a transformer deluge initiation due to water hammer, and provide reasonable assurance that the system was capable of fulfilling its intended function and could return to monitoring under 10 CFR 50.65(a)(2). This issue was entered into the licensee's corrective action program.

The finding is more than minor. In accordance with IMC 0612, Appendix E, "Examples of Minor Issues," Section 7, Maintenance Rule a(1) and a(2) violations are not minor because they involve structures, systems, and components (SSCs) that have demonstrated some degraded performance or condition. The finding was determined to be of very low safety significance (Green) because it does not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available.

Inspection Report# : [2009002](#) (*pdf*)

**Significance:**  Mar 31, 2009

Identified By: NRC

Item Type: FIN Finding

#### **IMPROPER INSULATION REPLACEMENT CAUSES RAPID MAIN TURBINE DOWNPOWER DUE TO SMOLDERING OIL-SOAKED INSULATION**

A finding of very low safety significance was self-revealed when improper installation of insulation surrounding the main turbine bearing number two oil deflector caused the main turbine to be taken off-line due to smoking insulation. An insulation blanket was blocking normal air flow used for cooling the oil deflector, causing oil to carbonize and clog the oil deflector screen. This issue was caused by the lack of procedural guidance for the installation and removal of insulation from the turbine. A corrective action was initiated to create a procedure which incorporates specific guidance for removing and installing the insulation. This finding was more than minor because the issue is associated with the design control attribute of the initiating events cornerstone and affects the cornerstone objective of limiting the likelihood of events that upset plant stability. The finding was not a loss of coolant accident (LOCA) initiator and did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available. The finding was not considered an external event initiator. Therefore, the finding was determined to be of very low safety significance.

Inspection Report# : [2009002](#) (*pdf*)

---

### Mitigating Systems

**Significance:**  Sep 30, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

## **FAILURE TO SCHEDULE AND PERFORM PROCEDURALLY REQUIRED POST-MAINTENANCE TEST**

The inspectors identified a finding of very low safety significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for work planning and reviewing licensee personnel's failure to identify applicable post-maintenance testing requirements listed in the Post-Maintenance Testing Manual (PMTM) following replacement of the lube oil cooler for the Motor Driven Feed Pump (MDFP). Use of the PMTM and other sources for identifying testing was specified as a requirement in Section 4.2 of procedure NOP--WM-1005, "Work Management Order Testing Process." The finding was determined to be more than minor because the finding was associated with the Mitigating System Cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events. The inspectors determined that the finding was of very low safety significance (Green) because it did not result in a loss of function per Generic Letter 91 18, did not represent an actual loss of safety function, and was not potentially risk significant due to external events. Although not confirmed by planned testing, the replacement of the lube oil cooler did not significantly change the bearing cooling capability of the MDFP. This finding has a cross-cutting aspect in the area of human performance with the component of work practices because the licensee did not ensure proper supervisory and management oversight of the work planning activities (H.4(c)).

Inspection Report# : [2008004](#) (*pdf*)

**Significance: SL-IV** Jul 11, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Perform a 10 CFR 50.59 Evaluation for Service Water System Modification**

The inspectors identified a Severity Level IV NCV, having very low safety significance, of 10 CFR 50.59, "Changes, Tests, and Experiments," for the licensee's failure to provide a documented basis for determining that changes to the service water system did not require prior NRC approval. Specifically, the licensee removed flow restricting piping orifices which created an adverse change to the service water system, because the service water pumps could have insufficient net positive suction head during accident conditions. The licensee revised the service water system operating procedure to ensure that this change did not result in operation of the service water pumps with inadequate net positive suction head and entered this issue into the corrective action program.

Because the issue affected the NRC's ability to perform its regulatory function, this issue was evaluated using the traditional enforcement process. The finding was determined to be more than minor because the inspectors could not reasonably determine that the change would not have ultimately required NRC prior approval. The finding was determined to be of very low safety significance because the licensee had not aligned the service water system in a configuration that could have damaged the pumps (Section 1R17.1.b.1)

Inspection Report# : [2008008](#) (*pdf*)

**Significance:**  Jun 30, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

### **INADEQUATE MANAGEMENT OVERSIGHT DURING ORANGE RISK ACTIVITY**

The inspectors identified a non-cited violation of 10 CFR 50.65(a)(4) for failure to implement a procedurally-required risk management activity for an orange risk activity. The licensee failed to provide required management oversight of a critical step in a surveillance test of the Auxiliary Feedwater System Train 1. The surveillance test rendered the train inoperable and unavailable. The licensee entered the issue into their corrective action program. The finding is greater than minor using the guidance of IMC 0612, Appendix B, Section 3 ("Minor Questions"), question (5)(i) and question (2). The licensee failed to implement prescribed significant compensatory measures for an elevated risk activity; and if the practice were left uncorrected, the issue would become a more significant safety concern involving programmatic issues. The finding was of very low safety significance, using IMC 0612, Appendix K, flowchart 2, because the incremental core damage frequency associated with the surveillance was less than  $1 \times 10^{-6}$ . A contributing cause of the finding is related to the cross-cutting element of human performance (H4.(b)) in that there were varying expectations on the extent of procedure compliance, and some personnel were not complying with all elements of applicable procedures.

Inspection Report# : [2008003](#) (pdf)

**Significance:**  Jun 06, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

**This is a security Related Finding - see inspection report for details.**

This finding, affecting the Mitigating Systems Cornerstone, is related to mitigative measures developed to cope with losses of large areas of the plant; in respons to Section B.5.b of the February 25, 2002, Interim Compensatory Measures (ICM) Order (EA-02-026) and related NRC guidance. This finding has been designated as "Official Use Only - Security-Related Information": therefore, the details of this findng are being withheld from public disclosure. This finding has a cross-cutting aspect in the area of Human Performance - documentation, procedures, and component labeling. See inspection report for more details.

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

---

## Barrier Integrity

**Significance:**  Jun 30, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

**CREVS TRAIN 2 INOPERABLE DUE TO LOSS OF REFRIGERANT CHARGE**

The inspectors identified a non-cited violation (NCV) of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," when the licensee did not correct a condition adverse to quality, associated with a refrigerant leak on the regulating valve for Control Room Emergency Ventilation System (CREVS) Train 2, that eventually rendered CREVS Train 2 inoperable based on a loss of refrigerant charge. This finding is greater than minor because it is associated with the System, Structures, and Components (SSC) and Barrier Performance attribute of the Barrier Integrity cornerstone and negatively affected the cornerstone objective to ensure the availability, reliability, and capability of systems used to maintain the radiological barrier functionality of the control room, particularly for CREVS to maintain a suitable environment for safety-related equipment and operators. The licensee entered the equipment issue into their corrective action program. The finding is of very low safety significance because the finding only represents a degradation of the radiological barrier function provided for the control room. The cause of the finding is related to the cross-cutting aspect of problem identification and resolution (P1.(d)) in that the licensee did not take actions to correct the refrigerant leak in a timely manner, commensurate with the issue's safety significance.

Inspection Report# : [2008003](#) (pdf)

---

## 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

**Significance:**  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

### **INADEQUATE MANAGEMENT OVERSIGHT TO ENSURE SPECIFIED CORRECTIVE ACTIONS WERE BEING ACCOMPLISHED**

The inspectors identified a non-cited violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," in that the licensee failed to have appropriate qualitative or quantitative measures to ensure that corrective actions specified in department directives and requirements of business practices were actually being accomplished. This contributed to further issues in the Chemistry Department with adherence to procedure requirements. This issue was entered into the licensee's corrective action program.

The finding was more than minor because if left uncorrected the finding could become a more significant safety concern and was a factor in subsequent procedure compliance and component mispositioning issues within the Chemistry department. The inspectors determined that the finding was not suitable for SDP evaluation because the failure to adhere to specified requirements or to have methods to determine adherence did not directly result in degraded or inoperable equipment. This finding was reviewed by Regional Management and determined to be of very low safety significance. This finding had a cross-cutting aspect in the area of Human Performance, Work Practices, because the licensee did not ensure adequate supervisory and management oversight of work activities of the technicians in the field and of personnel providing activities to upgrade procedures and standing orders.

Inspection Report# : [2009002](#) (*pdf*)

Last modified : May 28, 2009