

Kewaunee

3Q/2009 Plant Inspection Findings

Initiating Events

Significance:  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure To Adequately Analyze The Automatic Fast Transfer Feature That Allowed Operation With Both 4.16-kiloVolt Safety-Related Buses 1-5 And 1-6 Connected To The Reserve Auxiliary Transformer

A finding of very low safety-significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the failure to perform a power system analysis calculation that would have identified that the fast transfer design feature/scheme was deficient, in that, it allowed an unanalyzed electrical power system alignment where both redundant 4.16-kiloVolt safety-related buses were being supplied by an offsite source via the same transformer. Use of this electrical configuration could have resulted in an out-of-phase transfer, loss of available offsite power to the buses and potential damaging effects on redundant safety related equipment, during a design basis event such as initiation of safety injection signal. When identified, the licensee entered this issue into their corrective action program and implemented interim actions to prohibit use of the fast transfer feature or manually aligning two safety-related buses to be fed from the same transformer during plant operation.

This performance deficiency was more than minor because the failure to perform the required calculation resulted in a condition where the plant was being operated in an unanalyzed configuration where there was reasonable doubt as to the operability of redundant safeguard loads; this concern resulted in issuance of a Licensee Event Report 2007-007-00 on May 21, 2007. Consequently, the potential for damage or loss of power to safety-related loads during an event could have led to unacceptable consequences. The finding screened as being of very low safety-significance (Green) for the Initiating Events Cornerstone because the finding did not contribute to both the likelihood of a reactor trip and the likelihood that mitigating equipment or functions will not be available. The inspectors did not identify a cross cutting aspect associated with this finding because the cause of the performance deficiency was related to a historical design issue and not indicative of current licensee performance.

Inspection Report# : [2009004](#) (*pdf*)

Significance:  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Design Analysis For 105-Ton Transfer Cask Lifting Beam

A finding of very low safety significance and associated Non-Cited Violation of Title 10 Code of Federal Regulations Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the licensee's failure to provide an adequate single failure proof design basis analysis for the 105-ton transfer cask-lifting beam. The licensee entered this issue into their corrective action program as condition report CR339267. The licensee revised the design calculation for the 105-ton transfer cask-lifting beam and demonstrated compliance with single failure proof acceptance criteria.

The finding was determined to be more than minor because the finding was associated with the Initiating Events Cornerstone attribute of equipment performance and adversely affected the cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. The finding was determined to be of very low safety significance by the NRC's significance determination process because the transfer cask-lifting beam had not been previously used at the Kewaunee Power Station. This finding has a cross-cutting aspect in the area of human performance, work practices, because the licensee did not ensure supervisory and management oversight of work activities, including contractors, such that nuclear safety is supported, in that, the licensee failed to perform an effective owner's review to assure that appropriate design

methods are used in calculations that demonstrate nuclear safety (H.4(c)).

Inspection Report# : [2009004](#) (pdf)

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inappropriate Application Of A Dedicated Operator During A Component Cooling Water Surveillance

A finding of very low safety significance (Green) and associated Non-Cited Violation of 10 CFR 50.65(a)(4) was identified by the inspectors for the failure to properly assess risk that resulted from risk significant maintenance being performed on the component cooling water (CCW) system, when the licensee inappropriately applied criteria for the use of a dedicated operator to meet availability requirements. As part of its corrective actions, the licensee stopped work that required the use of a dedicated operator pending further evaluation.

The issue was more than minor because the licensee's risk assessment for March 11, 2009, failed to consider the CCW unavailable during maintenance. Specifically, the failure to account for the unavailability of CCW resulted in an inadequate daily risk assessment and could affect the unavailability time of this system in related performance and maintenance rule indicators. The inspectors evaluated the finding using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment K, Maintenance Risk Assessment and Risk Management Significance Determination Process, dated May 19, 2005, and determined the issue screened as having very low safety significance (Green), because the incremental conditional core damage probability was less than $1E-6$ due to the test condition lasting only four hours. The inspectors determined that the finding had a cross cutting aspect in the corrective action program component of problem identification and resolution, because the licensee failed to thoroughly evaluate a prior problem such that the resolution addressed the causes and extent of conditions necessary to preclude this event (P.1(c)).

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

Significance:  Dec 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Transfer Turbine Valve Testing Requirements into the USAR

A finding of very low safety significance and associated Severity Level IV Non-Cited Violation of 10 CFR 50.71, "Maintenance of records, making of reports," was identified by the inspectors for the licensee's failure to adequately update the Kewaunee Power Station Updated Safety Analysis Report (USAR). Specifically, the inspectors identified that the licensee had not updated the USAR completely when they relocated the turbine valve testing requirements from technical specifications to the USAR in License Amendment No. 121. Proposed corrective actions include performing an apparent cause evaluation and USAR changes as appropriate.

This finding was more than minor because it had a material impact on licensed activities in that the incorrect USAR allowed the licensee to schedule periodic testing of the reheat and interceptor valves at an interval beyond one year. The inspectors evaluated the finding using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 3b, for the Initiating Events Cornerstone, dated January 10, 2008. Using information provided by the licensee, the inspectors answered "no" to the transient initiator contributor questions in this cornerstone column; therefore, the finding was determined to be of very low safety significance (Green). Additionally, the inspectors determined that the finding has a cross-cutting aspect in the area of problem identification and resolution, corrective action program, because the licensee failed to accurately identify the issue when conducting corrective actions for Condition Report CR040457, "Discrepancy in Turbine Valve Testing Requirements and Acceptance Criteria," [P.1(a)].

Inspection Report# : [2008005](#) (pdf)

Mitigating Systems

Significance:  Aug 20, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Improper Application of 440Vac Rated Motors

The inspectors identified a finding of very low safety-significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion III, Design Control,” for the failure to ensure the proper application of safety-related 440Vac motors. Specifically, eight 440Vac safety-related motors were not suitable for operation at analyzed voltages. This finding was entered into the licensee’s corrective action program.

The finding was more than minor because if left uncorrected it could result in the loss of safety-related 440Vac motors by overstressing of the motor windings through exposure to higher than design rated voltages, and in the failure of motor drive components caused by increased torque produced at the higher voltages. The finding was determined to be of very low safety-significance (Green) because it did not result in a loss of operability. The cause of this finding is related to the cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because the licensee did not identify this issue completely, accurately, and in a timely manner. The values were produced in a calculation but the licensee did not identify that they exceeded the acceptance criteria. (P.1(a)) (Section 1R21.3)

Inspection Report# : [2009006](#) (*pdf*)

Significance:  Aug 20, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inaccurate Minimum Low Head Safety Injection Flow Specified in Emergency Operating Procedure

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 the failure to specify the appropriate quantitative acceptance criterion to assure that adequate Emergency Core Cooling System flow would be delivered to the core following switchover to containment sump recirculation. This finding was entered into the licensee’s corrective action program.

The finding was determined to be more than minor because the licensee failed to include the appropriate quantitative set-point value for the minimum low-head safety injection train flow following switchover to containment sump recirculation to assure sufficient reactor coolant was available. This finding is of very low safety-significance (Green) because it did not result in a loss of operability, did not represent an actual loss of safety function, and is not potentially risk-significant due to external events. The cause of this finding is related to the cross-cutting aspect in the area of Human Performance, Work Practices, because the licensee did not ensure proper supervisory and management oversight of contractor work activities. Vendor calculations were used as the basis for an EOP set-point without taking into account specific plant design information such as instrument uncertainties, flow instrument calibration effects, and RHR minimum flow. (H.4(c)) (Section 1R21.3)

Inspection Report# : [2009006](#) (*pdf*)

Significance:  Aug 20, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate procedure for a Battery Room Flooding Event.

A finding of very low safety significance and associated Non-Cited Violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” was identified by the inspectors for the failure to provide adequate procedural direction to respond to a rupture of the service water piping in the battery rooms. As part of its corrective actions, the licensee revised OP-KW-AOP-MDS-001, “Abnormal Operation of Miscellaneous Drains and Sumps,” to correct the inadequate operator actions.

The finding was determined to be more than minor because the licensee failed to provide adequate procedural

direction for a battery room A or B flood caused by a rupture of the SW piping to/from the battery room fan coil unit in the affected battery room, which ensured the protection of the battery in the unaffected room not associated with the initial flooding event. This finding is of very low safety significance (Green) because it did not result in a loss of operability, did not represent an actual loss of safety function, and is not potentially risk-significant due to external events. The cause of this finding is related to the cross-cutting aspect in the area of Problem Identification and Resolution, Corrective Action Program, because the licensee did not fully evaluate the battery room flooding event (an issue potentially impacting nuclear safety) such that the resolution addressed causes, and extent of condition as necessary, to assure nuclear safety. (P.1(c)). (Section 1R21.6).

Inspection Report# : [2009006](#) (*pdf*)

Significance: SL-IV Jun 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Emergency Diesel Generator Air System May Not Be Appropriately Qualified

A finding of very low safety significance (Green) and an associated Non-Cited Violation of 10 CFR 50.59 were identified by the inspectors for the licensee's failure to obtain a license amendment when it failed to properly assess a quality assurance typing change to the emergency diesel generator starting air compressors. Violations of 10 CFR 50.59 are considered to be violations that potentially impede or impact the regulatory process, and are dispositioned using the traditional enforcement process. The licensee entered this issue into its corrective action program as Condition Report (CR) 326432 for evaluation and development of corrective actions, as appropriate.

Supplement I of the Enforcement Policy was used to determine the severity of the underlying technical issue evaluated under the Significance Determination Process (SDP). The issue was determined to be more than minor because it was associated with the Mitigating Systems Cornerstone attribute of design control and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). The inspectors evaluated the finding using the SDP and the inspectors screened the issue as very low safety significance (Green) because the quantity of air available to supply air for five start attempts of the diesels and to supply support systems for the emergency diesel generators always exceeded that needed for 24 hours of operation, thereby, resulting in the probabilistic risk assessment function for the diesels being met. The inspectors determined this issue had a cross-cutting aspect in the area of Problem Identification and Resolution, trending and assessment, because the licensee failed to perform aggregate assessments that could have identified and prevented this and related issues earlier (P.1(b)).

Inspection Report# : [2009003](#) (*pdf*)

Significance:  Jun 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure To Ensure That Motor Control Circuit Control Circuits Have Adequate Voltage To Operate During Design Basis Accident Conditions

. A finding of very low safety significance (Green) and an associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," were identified by the inspectors for the failure to verify that motor control center (MCC) control circuits for some ventilation fans and safety injection system isolation valves would have adequate voltage to operate and, therefore, could result in a loss of function of the circuits during a design basis accident. To address this issue, the licensee modified several MCC starter circuits, which entailed replacement of some inadequately-sized control power transformers, starters, and fuses, and implemented procedures changes to reduce MCC loads.

The finding was determined to be more than minor because the calculation errors resulted in four inoperable components and a condition where there was reasonable doubt on the operability of several other safety-related loads. The inspectors assessed the significance of this finding for each affected component and determined that the finding did not either relate to a containment structure, system, or component or containment status that had an impact on large early release frequency, or did not result in loss of operability or functionality of the safety injection system because the discharge isolation valves were aligned in their required accident positions and de-powered. In addition, the inspectors assessed the impact on the components powered from the MCCs and determined that the overall failure to ensure adequate voltage at the MCCs as having very low safety significance. Therefore, the finding screened as of

very low safety significance (Green). The inspectors determined that there was no cross-cutting aspect to this finding because the cause of the problem occurred many years and was not indicative of current performance.

Inspection Report# : [2009003](#) (pdf)

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Potential Debris Sources Could Clog A Drain Credited During Internal Floods

A finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the failure to translate the flooding design basis into specifications, procedures, and instructions. Specifically, the licensee failed to control the storage of material in the steam generator blowdown tank room that could potentially clog a floor drain, in an adjoining room, that was credited in a flood analysis. As part of its corrective actions, the licensee removed or secured the material of concern.

The finding was determined to be more than minor because it was associated with the Mitigating Systems Cornerstone attribute of Protection Against External Events and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). Specifically, the licensee did not put adequate controls in place to ensure that the drain would performed its credited function to be open and free flowing during an internal flood scenario involving a break in a 4-inch condensate line. The inspectors evaluated the finding using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a, for the Mitigating Systems Cornerstone, dated January 10, 2008. The significance of the finding was determined to be of very low safety significance (Green) because the inspectors answered "no" to the questions in the Mitigation Systems Cornerstone column. The inspectors did not identify a cross-cutting aspect associated with this finding because the controls over material that could plug the drain should have been implemented when calculation 2005-05708 was completed and incorporated in the flooding design basis in 2005; therefore, this issue was not reflective of current performance.

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

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Siphon Line Which Interconnected Two Diesel Generator Emergency Fuel Oil Storage Tanks Was Not Functioning as Designed

A finding of very low safety significance (Green) and associated Severity Level IV, Non-Cited Violation of 10 CFR 50.59 was identified by the inspectors while reviewing Unresolved Item 05000305/2008003-03, "Siphon Line Which Interconnected Two Diesel Generator Emergency Fuel Oil Storage Tanks Was Not Functioning as Designed." Specifically, while performing Updated Safety Analysis Report change request, UCR 93 031, the licensee inappropriately screened the removal of the Updated Safety Analysis Report reference to the siphon line when plant staff incorrectly answered "no" to all of the 10 CFR 50.59 evaluation questions. The licensee entered this issue into its corrective action program for evaluation and development of corrective actions, as appropriate.

Because violations of 10 CFR 50.59 are considered to be violations that potentially impede or impact the regulatory process, they are dispositioned using the traditional enforcement process. As described in Supplement I of the Enforcement Policy, to determine the severity of a 10 CFR 50.59 violation, the underlying technical issue was evaluated under the Significance Determination Process. The inspectors evaluated the finding using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1- Initial Screening and Characterization of Findings," Table 4a, for the Mitigating Systems Cornerstone, dated January 10, 2008. The inspectors answered "yes" to Question 2 in the Mitigation System Cornerstone column which required the issue to be evaluated in accordance with Appendix A, of Inspection Manual Chapter 0609. Using Appendix A, the inspectors screened the issue as very low safety significance (Green) because the quantity of fuel to the diesel generators that was historically available always exceeded that needed for 24 hours of operation, thereby, resulting in the probabilistic risk assessment function for the diesels being met. The inspectors

determined that the issue had a cross-cutting aspect in problem identification and resolution, corrective action program, because the licensee had identified similar deficiencies with accurately applying or interpreting the current licensing basis, and failed to take timely action to complete corrective actions, or establish barriers to prevent recurrence of this deficiency (P.1(d)).

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

Significance:  Dec 31, 2008

Identified By: NRC

Item Type: NCV NonCited Violation

Emergency Diesel Generator Room Cooling Fan Testing Deficiencies

A finding of very low safety significance and an associated NCV of 10 CFR, Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the licensee's failure to verify the ventilation flow rate for the emergency diesel generator (EDG) rooms and for using an incorrect EDG heat load in the design basis calculation of record. As part of corrective actions, the licensee remeasured flow rates and duct dimensions and recalculated post-accident temperature values.

This finding was more than minor because a revision to the design calculation was necessary to demonstrate EDG cubicle temperatures would remain under the design basis 120 degrees Fahrenheit (°F) equipment qualification limit under any accident conditions. The finding was of very low safety significance (Green) based on a Phase 1 screening in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," dated January 10, 2008, because the revised calculation showed that the diesel generators had remained operable in all circumstances. There was no cross-cutting aspect associated with this finding.

Inspection Report# : [2008005](#) (pdf)

Barrier Integrity

Significance:  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Containment Isolation Valve Inoperable With No Technical Specification Action requirement Entry

A finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the licensee's failure to have adequate procedures that ensured technical specifications were entered and followed for containment isolation valves. The licensee entered the issue into their corrective action program as Condition Report 344856 and Condition Report 350526A, and provided additional guidance to operations personnel. At the end of the inspection period, the licensee continued to perform a causal analysis.

The inspectors determined that the issue was more than minor because the finding, if left uncorrected, would become a more significant safety concern. Specifically, not entering the appropriate technical specification action requirements, when necessary, would lead to more significant safety concerns. The inspectors determined the finding could be evaluated using the Significance Determination Process in accordance with Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of findings," Table 4a for the Barrier Integrity Cornerstone. The inspectors answered no to the Barrier Integrity questions and screened the finding as having very low safety significance (Green). The finding has a cross-cutting aspect in the area of human performance, resources, because the licensee did not have complete, accurate and up-to-date design documentation, procedures and work packages (H.2(c)).

Inspection Report# : [2009004](#) (pdf)

Significance:  Aug 20, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Non-Conservative Main Steam Line Break Analysis

The inspectors identified a finding of very low safety significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion III, Design Control,” for the failure to correctly translate the design bases for the maximum steam generator narrow range level into procedures and instructions. This finding was entered into the licensee’s corrective action program.

The finding was determined to be more than minor because an evaluation was required to ensure that accident analysis requirements for peak containment pressure were met. The finding also impacted the Barrier Integrity cornerstone attribute of procedure quality, and affected the cornerstone objective of maintaining the functionality of containment to protect the public from radionuclide releases caused by accidents or events. Procedural guidance was not adequate to maintain the plant within the parameters specified in the analysis for containment operability. The finding screened as having very low safety significance (Green) because there was no actual barrier degradation. The inspectors determined there was no cross-cutting aspect associated with this finding. (Section 1R21.4)

Inspection Report# : [2009006](#) (pdf)

Significance: SL-IV Aug 20, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate 50.59 Evaluation of Shutdown Loss of Coolant Accident Procedure.

The inspectors identified a finding of very low safety significance and associated Non-Cited Violation of 10 CFR 50.59(d)(1) for the licensee’s failure to perform an adequate review of an abnormal operating procedure associated with a shutdown loss of coolant accident. As part of its corrective actions, the licensee revised procedure OP-KW-AOP-RHR-002 to remove the procedure applicability to the Cold Shutdown mode and Refueling mode with reactor vessel head on.

The inspectors determined that the finding was more than minor because it could not reasonably be determined that the activity would not ultimately have required NRC approval. Operation in accordance with the procedure may have challenged the reactor coolant system barrier. The inspectors determined that the finding did not require a quantitative assessment per IMC 0609, Appendix G. Therefore, the finding screened as having very low safety significance (Green) and was determined to be a Severity Level IV violation. The cause of this finding is related to the cross-cutting aspect in the area of Human Performance, Decision Making, because the licensee failed to use conservative assumptions in decision making to demonstrate that the proposed action to include additional modes of applicability for the Shutdown LOCA procedure was safe in order to proceed. (H.1(b)) (Section 1R21.6)

Inspection Report# : [2009006](#) (pdf)

Significance:  Jun 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failed Backdraft Damper Renders Containment Fan Coil Unit Inoperable

. A finding of very low safety significance (Green) and an associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” were self revealed for the licensee’s failure to maintain adequate procedures for the inspection and verification-of-operation for the “A” containment fan coil unit backdraft dampers. The licensee entered this issue into the licensee’s corrective action program as Condition Report (CR) 328191; immediate corrective actions were accomplished to repair the affected components.

The finding was determined to be more than minor because the finding was associated with the Barrier Integrity Cornerstone attribute of design control and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers, specifically containment, protect the public from radionuclide releases caused by accidents or events. The inspectors determined the finding could be evaluated using the Significance Determination Process (SDP) and screened the finding as having very low safety significance (Green). This finding has a cross-cutting aspect in the area of Problem Identification and Resolution, operating experience, because the licensee did not use operating experience to support plant safety (P.2(b)).

Inspection Report# : [2009003](#) (pdf)

Significance:  Jun 30, 2009

Identified By: NRC

Item Type: FIN Finding

Failure To Update Procedures As Required By Commitments

A finding of very low safety significance (Green) was identified by the inspectors for the licensee's failure to update procedures as required by NRC commitments. Specifically, a procedure for fuel oil sampling and a procedure for steam generator tube inspections were not maintained as required by the referenced commitments. The inspectors determined that the issues constituted a finding relating to management of commitments as required by Nuclear Energy Institute 99-04, "Guidelines for Managing NRC Commitment Changes." The licensee has entered this issue into its corrective action program as Condition Report (CR) 340864 to assess the failure to the effects of revisions to reference and end-use documents on each other.

The inspectors concluded that the issue was more than minor because the integration of vendor/industry guidance was related to a commitment to the NRC for steam generator tube inspections, and the failure to appropriately manage the commitments impacted the regulatory process. The issue was administrative in nature and did not impact any safety or risk significant systems, therefore, the issue was determined to be of very low safety significance (Green). The inspectors determined that the issue had a cross cutting aspect related in the area of Human Performance, resources, because the licensee failed to maintain the related procedures complete, accurate, and up to date (H.2(c)).

Inspection Report# : [2009003](#) (*pdf*)

Significance:  Mar 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Steam Exclusion Door Failure Results In Multiple Safety Systems Being Declared Inoperable

A finding of very low safety significance (Green) and associated Non-Cited Violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was self-revealed for the licensee's failure to follow the corrective action program procedure to implement corrective actions that could have prevented a December 30, 2008, door seal failure, which rendered both trains of control room ventilation inoperable. The licensee entered this issue into its corrective action program and, as partially corrective action, has increased its monitoring of doors for potential failure mechanisms.

The finding was determined to be more than minor because it was associated with the Barrier Integrity Cornerstone attribute of Configuration Control and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The inspectors evaluated the finding using the Significance Determination Process (SDP) in accordance with Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," dated January 10, 2008, and determined the finding represented a degradation of the barrier function to protect against radiological hazards, toxic gas, and smoke that required a Phase 3 analysis. A Region III Senior Reactor Analyst completed a qualitative Phase 3 analysis and determined that because the duration of the event was small, 44 minutes, the issue screened as having very low safety significance (Green). The inspectors determined that the finding had a cross-cutting aspect in the corrective action program component element of problem identification and resolution because the licensee failed to take appropriate corrective actions to address safety issues and adverse trends in a timely manner (P.1(d)).

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

Emergency Preparedness

Significance:  Jun 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Seismic Monitoring System Repeatedly Fails Surveillance

A finding of very low safety significance (Green) and an associated Non-Cited Violation were identified by the inspectors for the licensee's failure to maintain radiation monitoring instrumentation operable that was required by its emergency plans to meet the standards set forth in 10 CFR 50.47(b). Specifically, seismic instrumentation needed for two Emergency Action Levels, HU1.1 and HA1.1, was not maintained operable such that a related Unusual Event notification and an Alert declaration could have been made under certain conditions. Corrective actions were taken for this issue and included revising Emergency Action Level (EAL) requirements to values within the range of the instrumentation.

The inspectors determined that the issue was more than minor because the finding, if left uncorrected, would become a more significant safety concern. Specifically, for a seismic event, the deficiency could lead to the failure to declare an Unusual Event for a "Natural and Destructive Phenomena Affecting the Plant Protected Area," HU1.1, and an Alert for a "Natural and Destructive Phenomena Affecting the Plant Vital Area," HA1.1. The inspectors determined the finding could be evaluated using the Significance Determination Process (SDP) and concluded that the risk significant planning standard problem was not a functional failure, nor did it represent a degraded function and, therefore, screened as an issue of very low safety significance (Green). The inspectors determined this was a Green risk significant planning standard problem, rather than degraded or failed risk significant planning standard function, because the process failure affected only one Unusual Event and one Alert emergency classification. The inspectors determined this issue had a cross-cutting aspect in the area of Problem Identification and Resolution, trending and assessment, because the licensee failed to perform aggregate assessments that could have identified and prevented this and related issues earlier (P.1(b)).

Inspection Report# : [2009003](#) (*pdf*)

Occupational Radiation Safety

Public Radiation Safety

Significance:  Jun 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Calibration Of Radiation Monitor R-19

A finding of very low safety significance (Green) and an associated Non-Cited Violation of Technical Specification 4.1 were identified by the inspectors for the licensee's calibration practices for process radiation instrument R-19 that did not qualify as a "Channel Calibration" as required by technical specifications. Specifically, the sources for calibration of R-19 were not of sufficient strength to test the instrument in the range where alarms were required to be operable. Corrective actions were taken for this issue and included revising Emergency Action Level (EAL) requirements to values within the range of the instrumentation.

The inspectors determined that the issue was more than minor because it was associated with the Public Radiation Safety Cornerstone attribute of equipment and instrumentation and adversely affected the cornerstone objective to ensure protection of public health and safety from exposure to radioactive materials released into the public domain. The inspectors used Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," Attachment D, "Public Radiation Safety Significance Determination Process," dated February 12, 2008, and determined that the finding was in the licensee's radiological effluent monitoring program and was contrary to a technical specification requirement. However, the finding was not related to a spill or release of radioactive material to the environment and, therefore, screened as an issue of very low safety significance (Green). The inspectors reviewed this issue for a cross-cutting aspect and determined that no cross-cutting aspect was applicable.

Inspection Report# : [2009003](#) (*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: SL-IV Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure To Follow Independent Spent Fuel Storage Installation Loading Procedure Step

The inspectors identified a Severity Level IV Non-Cited Violation of 10 CFR 72.150, "Instructions, Procedures, and Drawings," during the Independent Spent Fuel Storage Installation loading campaign. The licensee failed to follow procedure OP KW NOP ISF 001, "Dry Shielded Canister Loading." The inspectors determined that the licensee's failure to follow step 5.2.6 of Procedure OP-KW-NOP-ISF-001 to perform a crane brake check was contrary to 10 CFR 72.150. The licensee immediately evaluated the situation and discussed the need to check the crane brakes when lifting loads approaching the rated loads with the refueling crew to prevent missing this step in the future.

The inspectors determined that the violation had more than minor safety significance because the failure to check the crane brakes, results in not knowing if the brakes are functioning properly, which may lead to a failure of the brakes while lifting a loaded spent fuel canister. The issue was addressed by traditional enforcement since 10 CFR Part 72 is not risk based and is not covered under the reactor oversight process. Because this violation was of very low safety significance, was non-repetitive and non-willful, and was entered into the corrective action program, this violation is being treated as a Non-Cited Violation of 10 CFR 72.150 consistent with Section VI.A.1 of the Enforcement Policy. The inspectors determined that there was no cross-cutting aspect associated with this finding.

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