La Salle 2
3Q/2009 Plant Inspection Findings

Initiating Events

Significance: G Aug 15, 2009
Identified By: NRC
Item Type: FIN Finding
Reactor SCRAM during turbine testing
The inspectors identified a finding of very low safety significance for the licensee failing to recognize that an existing alarm condition in the Unit 2 DEHC trip logic would result in a turbine trip and subsequent reactor SCRAM when weekly turbine trip testing was performed. The licensee entered this issue into its corrective action program as Issue Report (IR) 953784.

The finding was greater than minor because it affected the initiating events objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions during power operations and was associated with the cornerstone attribute of configuration control. The inspectors determined that the finding was Green or of very low safety significance by answering no to the Inspection Manual Chapter (IMC) 0609 Phase 1 Screening Worksheet question “Does the finding contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available?” The finding had a cross cutting aspect in the area of Human Performance (resources) in that the site’s design documentation was not complete and accurate with regards to the necessary ramifications of a control module communications failure (H.2(c)).

Inspection Report# : 2009004 *(pdf)*

Significance: G Jun 24, 2009
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to implement a fire protection program procedure for combustible controls
A finding of very low safety significance and associated NCV of Technical Specifications was identified by the inspectors for the failure to implement a fire protection program procedure for combustible controls. Specifically, the inspectors identified three examples where transient combustible materials were staged adjacent to cable risers contrary to Procedure OP-AA-201-009, “Control of Combustible Material,” Revision 7.
Description: On June 24, 2009, during a Fire Protection walkdown, the inspectors identified three examples of transient combustible material staged adjacent to cable risers in the Unit1 and Unit 2 reactor buildings. Specifically, the inspectors found a cabinet containing oil absorbing pads that was staged adjacent to safety-related cable risers in the 761’ elevation of the Unit 2 auxiliary building. The inspectors also identified a cart with the same contents (oil absorbing pads) in the 761’ elevation of the Unit 1 auxiliary building; however, this cart also contained anti-contamination clothing and mop heads. In addition, the inspectors identified a third example in the 820’ elevation of the Unit 2 reactor building where a maintenance cart containing welding equipment was staged near a safety-related cable riser. The carts containing transient combustible materials described in the three examples were staged less than two feet from the safety-related cable risers. The licensee placed the issue into their corrective action program (Action Request (AR) 934986, “NRC Identified: Transient Combustibles Near Cable Riser”) and subsequently removed the carts and cabinets with combustible material from all three locations.

Inspection Report# : 2009003 *(pdf)*

Significance: G Nov 17, 2008
Identified By: NRC
Item Type: NCV NonCited Violation
Unauthorized Transient Combustibles

A finding of very low safety significance and associated NCV of Technical Specifications was identified by the inspectors for the failure to implement a fire protection program procedure for combustible controls. Specifically, the inspectors identified three examples where transient combustible materials were staged adjacent to cable risers contrary to the licensee's procedure for combustible controls. The licensee subsequently removed the transient combustible materials and entered the issue into their corrective action program.

The finding was determined to be more than minor because, the finding was similar to IMC 0612, Appendix E, Example 4.k, in that the transient combustibles presented credible fire scenarios, which could affect equipment important to safety. The issue was of very low safety significance because, the finding represented a low degradation of the licensee's combustible controls program. Additionally, this finding has a cross-cutting aspect in the area of Human Performance for the Work Practices component because, multiple examples were identified where transient combustibles were staged contrary to site procedures. [H.4(b)]
Inspection Report# : 2008007 *(pdf)*

Mitigating Systems

Significance: G Sep 18, 2009
Identified By: NRC
Item Type: NCV NonCited Violation
Inadequate Revision for Technical Requirement Manual Section
A finding of very low safety-significance (Green) and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedure, and Drawings" was identified by the inspectors for the licensee's failure to ensure that specific requirements of the Technical Requirement Manual (TRM) Section 3.8.b. would be performed as written. Specifically, the licensee inappropriately revised the applicability section of TRM 3.8.b. and added that the TRM actions were applicable when the circuit breaker associated with an inoperable protective device was closed and receiving power from an energized source. This revision did not ensure that verification of circuit breaker position would be performed on a periodic basis when/if the breaker was open. The licensee subsequently entered the issue into their corrective action program as AR 00961522.

The finding was determined to be more than minor because the finding, if left uncorrected, would become a more significant safety concern. The revised applicability section of TRM 3.8.b did not ensure that necessary action, i.e. verification of circuit breaker position, would be performed to ensure that primary containment electrical penetrations would not be subject to excessive fault currents. The finding was of very low safety-significance based on a Phase 1 screening in accordance with IMC 0609, Appendix A, A Significance Determination of Reactor Inspection Findings for At-Power Situations. This finding was not associated with a cross-cutting aspect because the finding was not indicative of the licensee's current performance.

Inspection Report# : 2009006 *(pdf)*

Significance: G Jul 31, 2009
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to declare SBLC system inoperable during surveillance testing
The inspectors identified a finding of very low safety significance during a monthly SBLC pump run on Unit 2. Specifically, operations personnel performing LOS-SC-Q1, "SBLC pump operability test," did not posses appropriate procedural guidance while performing this test and as a result did not declare both trains for SBLC system inoperable and did not enter the associated LCO Action Statements as required per Technical Specifications. A non-cited violation of Technical Specification 5.4.1, "Procedures," was also identified for failure to use a procedure appropriate for the circumstance to provide adequate precautionary guidance to account for the inoperability of the SBLC system during the surveillance performance.

The inspectors determined that the finding was more than minor because it was associated with the procedure quality attribute of the Mitigating Systems cornerstone, and it affected the cornerstone objective to ensure availability,

reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, operations personnel would not have been able to return SBLC to a standby configuration if needed in case of an anticipated transient without a SCRAM (ATWS) in 120 seconds as required by the design basis. The finding was determined to be of very low safety significance using the significance determination process (SDP) Phase 2. This finding was also related to the cross cutting area of Human Performance (resources) because the procedure used for this evolution was inaccurate in that it provided improper guidance to maintain SBLC operability provided that a dedicated operator was briefed and stationed locally. Corrective actions by the licensee include the future revision of procedure LOS-SC-Q1, to remove the statement that indicates that the system can be maintained operable during the surveillance and to include an emergency restoration attachment with steps to quickly return the system to its standby configuration if required in case of an ATWS.

Inspection Report# : 2009004 *(pdf)*

Significance: G Dec 31, 2008
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to Incorporate Regulatory Guide 1.9 Testing Methodology into Procedures
The inspectors' identified a finding of very low safety significance (Green) and an associated NCV of 10 CFR 50, Appendix B, Criterion XI, “Test Control”, for the failure to establish a minimum DG run time of at least five minutes when performing the hot restart test as is called for by Regulatory Guide 1.9, “Selection, Design, Qualification, and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants”, Revision 3. While reviewing DG testing and maintenance methodologies at LaSalle Station as a part of operating experience smart sample OpESS 2008 01, the inspectors identified that licensee procedures for performing the DG hot restart test did not include a minimum run time requirement of five minutes as is required in Regulatory Guide 1.9, “Selection, Design, Qualification, and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants”, Revision 3. The inspectors noted that the licensee is committed to Regulatory Guide 1.9, Revision 3 for testing of the site’s DGs as is noted in Appendix B of the LaSalle County Station UFSAR. Regulatory Guide 1.9, Revision 3 section 2.2.10 stated in part “Demonstrate hot restart functional capability at full load temperature conditions ... by verifying that the emergency diesel generator starts on a manual or autostart signal, attains the required voltage and frequency within acceptable limits and time, and operates for longer than 5 minutes.” The inspectors noted that licensee procedures which performed the hot restart test were solely based on acceptance criteria specified in the station’s TS Surveillance Requirement 3.8.1.15 which did not include the minimum five minute run time. The inspectors noted that the licensee’s TS Bases document described the minimum 5 minute run time for those surveillances which required it as a TS acceptance criteria by stating in part, “the surveillance should be continued for a minimum of five minutes in order to demonstrate that all starting transients have decayed and stability has been achieved.”
The inspectors subsequently reviewed operator logs to determine if the DGs had been run for the minimum five minutes when hot restart testing had been last performed. The inspectors identified that on September 19, 2007 the 1A diesel was run for only three minutes and on October 9, 2007 the 2B diesel was run for only two minutes when the hot restart test was last performed.

Inspection Report# : 2008005 *(pdf)*

Significance: G Nov 17, 2008
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to provide a sprinkler system for Fire Zone 4F3
A finding of very low safety significance and associated NCV of the license condition was identified by the inspectors for the failure to install a sprinkler system. Specifically, the licensee had installed a pre-action spray system above the suspended ceiling in Fire Zone 4F3 instead of a pre-action sprinkler system as specified by the Fire Protection Report. The licensee subsequently entered the issue into its correction action program.

The finding was determined to be more than minor because, the installed spray system was less capable than a sprinkler system in that, a fire would be permitted to grow to a larger size and cause more damage as a result of delayed system actuation. The issue was of very low safety significance due to remaining mitigating system

capability.
Inspection Report# : 2008007 *(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

Significance: SL-IV Jul 20, 2009
Identified By: NRC
Item Type: NCV NonCited Violation
Failure to make required non-emergency 50.72 notification to NRC following loss of shutdown cooling
The inspectors identified a Green (Severity Level IV) NCV of 10 CFR 50.72 (b)(3)(v) for the licensee's failure to make a required non-emergency eight hour notification to the NRC for a loss of safety function of a system which was required to remove residual heat from the reactor. The licensee entered this issue into their corrective action program as IR 971982.

The inspectors determined that the finding should be evaluated using the traditional enforcement process, since the failure to make a required report to the NRC had the potential to impact the agency's ability to perform its regulatory function. The finding was considered to be Severity Level IV as the NRC Enforcement Policy states in part that, "the severity level of a violation involving the failure to make a required report to the NRC will be based upon the significance of and the circumstances surrounding the matter that should have been reported." As such, the ability of the operators to restore a train of the RHR system by non-extraordinary means and in a timely manner (without experiencing an unplanned mode change) to a shutdown cooling lineup was considered by the inspectors to have mitigated the effects of the loss of functionality of the decay heat removal system to a very low safety impact on the plant.

Inspection Report# : 2009004 *(pdf)*