

# Oconee 3

## 3Q/2009 Plant Inspection Findings

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### Initiating Events

**Significance:**  Aug 28, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Provide Margin Between the LPI Relief Valve Set Point and the Peak Discharge Pressure of the LPI System**

A self-revealing, non-cited violation (NCV) of 10 CFR 50 Appendix B, Criterion III, Design Control, was identified for failure to provide sufficient margin between the peak discharge pressure of the low pressure injection (LPI) system and the relief valve setpoint for the Unit 3 B-train LPI cooler (3LP-37). This resulted in the inadvertent opening of 3LP-37 during LPI startup for decay heat removal on April 25, 2009. The licensee entered the issue into the corrective action program and revised the applicable operating procedure to provide additional margin during LPI startup for decay heat removal.

The failure to provide sufficient margin between the LPI relief valve set point and the peak discharge pressure of the LPI system upon startup was a performance deficiency. The finding was more than minor because, if left uncorrected, it would have the potential to lead to a more significant safety concern, specifically for loss of inventory if the relief valve failed to reset. Additionally, the finding was associated with the Initiating Events cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown, primarily inventory control. The finding was of very low safety significance (Green) because it met the availability requirements set forth in IMC 0609, Appendix G, Shutdown Operations SDP, which verified that the licensee was maintaining an adequate mitigation capability for shutdown operation. The cause of the finding had a cross-cutting aspect in the area of “human performance.” It was directly related to the “licensee not conducting effectiveness reviews of safety-significant decisions to verify the validity of the underlying assumptions, identify possible unintended consequences, and determine how to improve future decisions” aspect of the “decision-making” component. Specifically, licensee calculation OSC-5616, reviewed and revised in 2008, identified a possible unintended consequence that 3LP-37 could lift during LPI pump start. This was not incorporated into plant procedures to prevent future relief valve lifts. Additionally, with the assumption that the relief setpoint for 3LP-37 was low, the licensee started the LPI system during the 3EOC24 outage under the same conditions that 3LP-37 lifted during the 3EOC23 outage (H.1(b)). (Section 4OA2.a.3)

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

**Significance:**  Jun 30, 2009

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Failure to Adequately Implement Procedures for Draining the Reactor Coolant System**

Green. A self-revealing non-cited violation (NCV) of Technical Specification 5.4.1 was identified for the failure to adequately implement the procedural requirements for draining the RCS to 100 inches in the pressurizer, resulting in draining approximately 4100 gallons more RCS inventory than desired.

The finding was considered to be more than minor because it was associated with the initiating events cornerstone attribute of human performance and affected the objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions. The finding was determined to be of very low safety significance (GREEN) based on the availability of diverse level indications and their associated low level alarms, and it was estimated that an additional 30 hours of draining would be required to approach midloop conditions. This finding has a cross-cutting aspect of personnel follow procedures (H.4(b)), as described in the Work Practices component of the Human Performance cross-cutting area.

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

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## Mitigating Systems

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## Barrier Integrity

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## Emergency Preparedness

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## Occupational Radiation Safety

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## Public Radiation Safety

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## 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.

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## Miscellaneous

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