

Comanche Peak 1

4Q/2009 Plant Inspection Findings

Initiating Events

Significance:  Mar 21, 2009

Identified By: NRC

Item Type: FIN Finding

Failure to Remove Debris from Rooftop Causes Potential Missile Hazard

The inspectors identified a finding for the failure to follow housekeeping guidance in Procedure STA 607, "Housekeeping Control," Revision 19. Specifically, the licensee failed to remove several pieces of thin scrap sheet steel approximately five feet long and one foot wide from the Unit 1 diesel generator building roof following maintenance. As a result, the material could have affected the offsite power supply to safety-related electrical busses if high winds carried it on to nearby transmission lines. The inspectors determined that the material was on the rooftop during periods of severe weather. The licensee entered the finding into their corrective action program for resolution as Smart Form SMF 2008 004000.

The finding was more than minor because it was associated with the initiating events cornerstone attribute of protection against external factors and affected the cornerstone objective, in that, it increased the likelihood of an event that would upset plant stability and challenge critical safety functions during shutdown as well as power operations. Using NRC Inspection Manual Chapter 0609, Attachment 4, "Phase 1- Initial Characterization and Screening of Findings," the finding screened as very low safety significance (Green) because the condition did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment would not be available. The cause of this finding was related to the Human Performance crosscutting component of work control, in that, the licensee failed to appropriately coordinate work activities.

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

Significance:  Mar 21, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Procedure Causes Unplanned Load Change

A self-revealing noncited violation of Technical Specification 5.4.1.a was identified for the failure of operators to follow procedural requirements when reducing turbine load. As a result, operators transposed two digits and inadvertently reduced turbine load from 1273.7 megawatts to 1237.5 megawatts instead of 1273.5 megawatts. In response to the transient, the control rods automatically inserted approximately 17 steps to maintain programmed reactor coolant system temperature. The licensee entered the finding into their corrective action program as Smart Form SMF 2009 000028.

The finding was more than minor because it was associated with the human performance attribute of the initiating events cornerstone, and directly affected the cornerstone objective to limit the likelihood of those events that upset plant stability during power operations. Using Manual Chapter 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," the finding was determined to have very low safety significance (Green) because it did not contribute to the likelihood of mitigating equipment being unavailable. The cause of the finding was related to the Human Performance crosscutting component of work practices for the failure to use self and peer checking techniques.

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

Mitigating Systems

Significance:  Sep 19, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Control Transient Equipment

The inspectors identified a Green noncited violation of Technical Specification 5.4.1.a for failure to comply with the work control procedure which requires that all transient equipment be tracked. Specifically, the licensee placed a floating dock in the service water intake structure for maintenance activities and did not track the dock in Maximo, the licensee's computer program for tracking work. As a result, the dock remained in place significantly longer than allowed without doing an engineering evaluation for the effects, potentially reducing the reliability of the service water pumps in case of a fire or flood. The licensee entered the finding into their corrective action program as Smart Form SMF 2009 001548-00.

The finding was more than minor because it was associated with the protection against external factors attribute of the Mitigating Systems cornerstone, and adversely affected the objective, in that, the reliability of the service water system was reduced in the cases of a fire or the probable maximum flood. The inspectors determined that because the fire scenario did not reflect the dominant risk of the finding, the flooding scenario would be used for the significance determination process. Using NRC Manual Chapter 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," the finding was determined to be of very low safety significance because the performance deficiency did not cause the loss of any safety function. This finding has a human performance crosscutting aspect associated with resources, in that the licensee failed to provide adequate training for personnel.

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

Significance:  Sep 19, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Postfire Safe Shutdown Procedure

The inspectors identified a noncited violation of Technical Specification 5.4.1.d for the failure to maintain adequate written procedures covering fire protection program implementation. Specifically, Procedure ABN 803A, "Response to a Fire in the Control Room or Cable Spreading Room," Revision 8, which is used to perform an alternative shutdown from outside of the control room, failed to assure that the train A charging pump, relied on for achieving postfire safe shutdown, would not be damaged because of a loss of suction. During an alternative shutdown, operators must use the train A charging pump for the reactivity control and reactor coolant makeup functions by providing borated water from the refueling water storage tank. The licensee entered the finding into their corrective action program as Smart Form SMF 2009-004453-00.

Failure to ensure that Procedure ABN 803 contained sufficient instructions to ensure that the credited train A centrifugal charging pump would be available following a postulated control room abandonment was a performance deficiency. This finding was more than minor because it was associated with the protection against external factors attribute of the Mitigating Systems cornerstone, and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to external events (such as fire) to prevent undesirable consequences. Based on the senior reactor analyst's significance determination process Phase 3 analysis, this finding was determined to have very low safety significance. The finding did not have a crosscutting aspect because it was not representative of current licensee performance.

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

Significance:  Sep 19, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Assure That One Train of Equipment is Free From Fire Damage

The inspectors identified a noncited violation of Unit 1 License Condition 2.G and Unit 2 License Condition 2.G. Specifically, the licensee failed to ensure that one train of the equipment required to achieve and maintain safe hot

shutdown conditions remained free from fire damage as specified in the approved fire protection program. The inspectors identified that the licensee relied upon local manual actions to mitigate the effects of potential fire damage rather than provide the physical separation or protection required in the approved fire protection program. The licensee entered the finding into their corrective action program as Smart Form SMF 2009-004454-00.

Failure to ensure that one train of the systems required for hot shutdown is free from fire damage was a performance deficiency. This finding was more than minor because it was associated with the protection against external factors attribute of the Mitigating Systems cornerstone, and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to external events (such as fire) to prevent undesirable consequences. Based on the senior reactor analyst's significance determination process Phase 3 analysis, this finding was determined to have very low safety significance. The finding did not have a crosscutting aspect because it was not representative of current licensee performance.

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

Significance:  Sep 19, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Alternative Shutdown Procedure

The inspectors identified a noncited violation of Technical Specification 5.4.1.d for the failure to maintain adequate written procedures covering fire protection program implementation. Specifically, during operator walkthroughs, the inspectors identified that Procedure ABN 803A, "Response to a Fire in the Control Room or Cable Spreading Room," Revision 8, used to perform an alternative shutdown from outside of the control room, had two examples of critical actions that could not be completed in the time required by the postfire safe shutdown analysis. The steps to respond to a potential spurious opening of the train A power operated relief valve and a potential loss of station service water cooling to the emergency diesel generator were not completed within the maximum allowable times specified in the procedure. As a compensatory measure, the licensee issued night orders to alert operators of these procedural concerns. The licensee entered the finding into their corrective action program as Smart Form SMF 2009 004455-00.

Failure to provide adequate procedural guidance to implement the requirements of the approved fire protection program was a performance deficiency. This finding was more than minor because it was associated with the protection against external factors attribute of the Mitigating Systems cornerstone, and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to external events (such as fire) to prevent undesirable consequences. Based on the senior reactor analyst's significance determination process Phase 3 analysis, this finding was determined to have very low safety significance. The finding did not have a crosscutting aspect because it was not representative of current licensee performance.

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

Significance:  Aug 14, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Untimely Corrective Actions For Bailey/Asea Brown Boveri Positioners

The team identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," for the failure of to promptly correct a condition adverse to quality when they did not apply thread sealant to safety-related atmospheric relief valves positioner adjustment screws. This issue was entered into the licensee's corrective action program as SmartForm SMF-2009-004054. The licensee took corrective actions by performing an operability determination, which provided reasonable assurance that the atmospheric relief valves were operable and completion of the thread sealant repairs could be reasonably delayed until the next scheduled outage.

The finding was more than minor since it affected the Mitigation System Cornerstone attribute of availability and reliability of mitigating equipment, specifically the operability of the atmospheric relief valves. Using Manual Chapter 0609, Attachment 4, "Phase 1- Initial Screening and Characterization of Findings," the finding was determined to have very low safety significance since it did not result in a loss of the safety system function. No crosscutting aspect was assigned because this issue was not indicative of current plant performance.

Significance:  Mar 21, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Initiate a Smart Form for Damage to Safety-Related Breakers

The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criterion V, for failure to follow procedures that require initiating a Smart Form for damage to safety-related equipment. The licensee discovered a bent shutter pin in the internal racking mechanism of a safety-related circuit breaker during maintenance. However, because the condition was not entered into the Smart Form database, the licensee failed to correct the cause of the condition and formally evaluate the impact of the condition on all of the associated 480 volt breakers. The licensee entered the finding into their corrective action program as Smart Form SMF-2009-000095.

The finding was more than minor because if the licensee continues to fail to document damage to safety-related equipment in a Smart Form, there is potential that it could lead to a more significant safety concern in that the damage will not be evaluated and corrected. Using NRC Inspection Manual Chapter 0609, Attachment 4, "Phase 1- Initial Characterization and Screening of Findings," the finding screened as very low safety significance (Green) because the condition did not result in the inoperability of safety-related breakers when they were required to be operable. The cause of this finding was related to the Problem Identification and Resolution crosscutting component of the corrective action program, in that, the licensee failed to enter the issue into the Smart Form database.

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