

# Oconee 2

## 2Q/2010 Plant Inspection Findings

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### Initiating Events

**Significance:** **G** Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Inadequate Risk Management Associated With the Unit 2 Electrical Generator Rotor Lifts**

Green. An NRC-identified Green non-cited violation (NCV) of 10 CFR 50.65(a)(4) was identified for the licensee's failure to adequately develop and effectively implement risk mitigation actions associated with lifting the Unit 2 main generator rotor. The licensee failed to establish and adhere to lift height restrictions to protect the Unit 1 and Unit 2 main feeder buses from damage in the event the rotor was dropped. The issue was entered into the licensee's corrective action program as PIPs O-10-2477 and O-10-2830. Corrective actions taken included enhancing the Critical Activity and Complex Lift Plans to provide additional guidance and mitigating actions as well as assigning increased oversight for future lifts.

The performance deficiency was more than minor because it affected the Human Performance attribute and adversely impacted the Initiating Events cornerstone objective in that the risk management strategies did not minimize the consequence of a rotor drop during the Unit 2 online lifts and were not effectively implemented during the Unit 2 outage lifts. The inspectors completed a Phase 1 screening using Inspection Manual Chapter 0609, Appendix K, Maintenance Risk Assessment and Risk Management Significance Determination Process, and determined that the finding was of very low safety significance (Green) because the Incremental Core Damage Probability increase was less than 1E-6. The finding directly involved the cross-cutting area of Human Performance under the "Work Activity Coordination" aspect of the "Work Control" component in that the licensee failed to appropriately control work activities by incorporating risk insight. [H.3(a)] (Section 1R13)

Inspection Report# : [2010003](#) (*pdf*)

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### Mitigating Systems

**Significance:** **W** Jun 09, 2010

Identified By: NRC

Item Type: VIO Violation

#### **Failure to promptly identify and correct an adverse condition affecting operability of the Unit 2 and Unit 3 standby shutdown facility**

A NRC-identified White violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, was identified for the licensee's failure to promptly identify and correct a condition adverse to quality associated with a degraded condition on Unit 2 and Unit 3 Standby Shutdown Facility (SSF) Reactor Coolant Makeup (RCM) subsystem letdown lines. This violation has been entered into the corrective action program as PIP O-10-1213.

The licensee's failure to promptly identify and correct the degraded condition of the Unit 2 and Unit 3 SSF RCM letdown lines as required by 10 CFR 50, Appendix B, Criterion XVI was a performance deficiency. The performance deficiency was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of Equipment Performance and adversely impacted the cornerstone objective because the degraded condition had the potential to affect reactor coolant system inventory control during an SSF event. This finding was characterized as a White finding of low to moderate significance with regard to safety. This finding does not present an immediate safety concern because the filters have been removed from the SSF RCM subsystem letdown lines on all three units. This finding directly involved the cross-cutting area of Human Performance under the Conservative Assumptions and Safe

Actions aspect of the “Decision Making” component (H.1(b)). (Section 40A5.b.1)

Inspection Report# : [2010007](#) (pdf)

Inspection Report# : [2010008](#) (pdf)

**Significance:** SL-III Jun 09, 2010

Identified By: NRC

Item Type: VIO Violation

**Materially inaccurate information provided to NRC regarding SSF event mitigation capability**

A licensee-identified SL-III violation of 10 CFR 50.9(a) was identified when the licensee determined that information contained in the “Oconee Nuclear Station SSF RC Letdown Action Plan” was inaccurate. This information was material to NRC because it was used, in part, as the basis for determining whether the licensee’s response to the degraded condition was adequate and whether additional compensatory actions or NRC review would be necessary. This violation has been entered into the corrective action program as PIP O-10-0561.

The failure to provide complete and accurate information impacted the regulatory process in that the inaccurate information was material to NRC’s determination that the licensee’s response to the degraded condition was adequate. The severity level of this violation is characterized at Severity Level III in accordance with the NRC Enforcement Policy. Cross-cutting aspects are not assigned to violations being dispositioned through the traditional enforcement process. (Section 40A5.b.2)

Inspection Report# : [2010007](#) (pdf)

Inspection Report# : [2010008](#) (pdf)

**Significance:**  Jun 09, 2010

Identified By: NRC

Item Type: VIO Violation

**SSF reactor coolant makeup subsystem inoperable for greater than allowed by technical specifications**

A self-revealing Yellow violation of Technical Specification 3.10.1 was identified when the Standby Shutdown Facility (SSF) Reactor Coolant Makeup (RCM) subsystem letdown line failed to pass the required flow. As a result, the SSF RCM subsystem was rendered inoperable for greater than the seven days allowed by technical specifications (TSs). This violation has been entered into the corrective action program as PIP O-09-7536.

The licensee’s failure to ensure the SSF RCM subsystem remained operable as required by TSs was a performance deficiency. The performance deficiency was determined to be more than minor because it was associated with the Mitigating Systems Cornerstone attribute of Equipment Performance and adversely impacted the cornerstone objective in that the letdown line could not perform its design function during an SSF event. This finding was characterized as a Yellow finding of substantial importance to safety. This finding does not present an immediate safety concern because the filters have been removed from the SSF RCM subsystem letdown lines on all three units. No cross-cutting aspect was identified because the most significant contributor to this finding was not indicative of current licensee performance. (Section 40A5.b.3)

Inspection Report# : [2010007](#) (pdf)

Inspection Report# : [2010008](#) (pdf)

**Significance:**  Apr 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Identify and Correct Fire Brigade Performance Weaknesses**

A Green NRC-identified NCV of Condition 3.D of Facility Operating Licenses DPR-38 (Unit 1), DPR-47 (Unit 2) and DPR-55 (Unit 3) was identified for the licensee’s failure to identify, critique, and develop corrective actions for fire brigade performance weaknesses during a fire drill as required by NSD 112, “Fire Brigade Organization, Training and Responsibilities.” This violation has been entered into the corrective action program as PIP O-10-1247.

The licensee’s failure to identify, critique, and develop corrective actions for fire brigade performance weaknesses

during a fire drill as required by NSD 112 was a performance deficiency. The performance deficiency was more than minor because it was associated with the protection against external factors attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective in that fire brigade performance weaknesses may delay fire brigade response allowing a fire to propagate leading to a more significant event. This finding was determined to be of very low safety significance because the condition of the automatic fire detection and suppression systems was satisfactory and the performance weaknesses would not have affected the ability to achieve safe shutdown. This finding directly involved the cross-cutting area of Human Performance, component of Work Practices, and aspect of personnel follow procedures in that the requirements of NSD 112; Section 112.6, were not met (H.4(b)). (Section 1R05)

Inspection Report# : [2010002](#) (*pdf*)

**Significance:**  Dec 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate Implementation of Risk Management Actions Associated With Modification Work Activities on the BWSTs for all Three Oconee Units**

An NRC-identified Green NCV of 10 CFR 50.65(a)(4) was identified for the licensee's failure to effectively implement the risk mitigation actions contained in the approved complex activity plans associated with modifications on all three Borated Water Storage Tanks (BWST). This violation has been entered into the licensee's CAP as Problem Investigation Process report (PIP) O-10-0171.

The failure to properly implement the risk management actions of the complex activity plan was a performance deficiency. The finding was more than minor because the modification work on the BWSTs was performed in a manner that had the potential to adversely affect the Emergency Core Cooling Systems primary water source for all three units if left uncorrected by damaging level transmitters and associated cables supporting ECCS suction swap-over. The inspectors completed a Phase 1 screening using Inspection Manual Chapter 0609, "Maintenance Risk Assessment and Risk Significance Determination Process," Appendix K, and determined that the finding was of very low safety significance (Green) based on the Incremental Core Damage Probability resulting from the work activities being less than 1E-6. The finding directly involved the cross-cutting area of Human Performance under the "Work Activity Coordination" aspect of the "Work Control" component in that the licensee failed to appropriately coordinate work activities to ensure the increased risk was minimized in accordance with the approved Complex Activity Plan [H.3(b)]. (Section 1R13)

Inspection Report# : [2009005](#) (*pdf*)

**Significance:**  Dec 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

**Inappropriate Removal of Workers Associated With Modification Work Activities on the BWST's from Work Hour Controls**

An NRC-identified Green NCV of 10 CFR 26.205 was identified when the licensee excluded individuals working on BWST modifications from work hour controls. This violation has been entered into the licensee's corrective action program as PIP O-09-6989.

The exemption of workers involved in work on a safety-related system from work hours controls was a performance deficiency. The performance deficiency was more than minor because if left uncorrected, the exclusion of workers from work hour controls could have led to a more significant safety concern due to personnel exceeding work hour limits while performing modification work on the BWSTs that could have adversely affected the primary water supply to the emergency core cooling systems. In addition, more than 60 workers were improperly excluded from work hour controls over the 2.5-month period encompassed by the licensee's exclusion. This finding was determined be of very low safety significance (Green) based on no deficiencies occurring due to worker fatigue which affected risk significant structures, systems, or components. This finding has a cross-cutting aspect of the licensee formally defining the authority and roles for decisions affecting nuclear safety and communicating these roles to applicable

personnel as described in the Decision-Making component of the Human Performance cross-cutting area [H.1(a)]. The licensee failed to ensure that the roles of personnel involved in processing requests exempting workers from work hour restrictions were adequately defined and communicated to ensure implementation of the work hour limits. (Section 40A5.2)

Inspection Report# : [2009005](#) (pdf)

**Significance:**  Oct 15, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate assessment and management of risk during SSF ASW inoperability (Section 1R13)**

An NRC-identified non-cited violation of 10 CFR 50.65(a)(4) was identified for the licensee's failure to provide adequate guidance to perform an appropriate risk assessment associated with the repair of a through-wall leak on the Unit 2 Standby Shutdown Facility (SSF) auxiliary service water (ASW) pump discharge line which rendered the Unit 2 SSF ASW system unavailable. The licensee initiated Problem Investigative Process reports (PIPs) O-09-6393 and O-09-6003 to evaluate this issue.

The inspectors determined the licensee's failure to provide adequate guidance to subsequently perform an appropriate risk assessment was a performance deficiency. The failure to provide guidance to adequately assess and manage risk was determined to be

greater than minor because, if left uncorrected, it had the potential to lead to a more significant safety concern in that risk management actions to protect risk-significant equipment would not have been timely implemented. The inspectors assessed the finding using IMC 0609, Appendix K, "Maintenance Risk Assessment and Risk Management Significance Determination Process," and determined that the finding was of very low safety significance (Green) based on the calculated incremental core damage probability being less than  $1 \times 10^{-6}$  and the additional risk management actions that were implemented. This finding also involved the cross-cutting aspect of failing to appropriately plan work activities by not fully incorporating risk insights as described under the Work Control component of the Human Performance cross-cutting area [H.3(a)]. (1R13)

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

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## Barrier Integrity

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## Emergency Preparedness

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## Occupational Radiation Safety

**Significance:**  Jun 30, 2010

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**Failure to Conduct an Adequate Area Radiation Survey of a Room in the Radwaste Facility**

Green. A self-revealing non-cited violation (NCV) of 10 CFR 20.1501(a) was identified for the licensee's failure to conduct an adequate area radiation survey to evaluate the magnitude and extent of radiation levels for an area located in the Radwaste Facility. This issue has been entered into the licensee's corrective action program as PIPs O-09-04475 and O-10-01503.

The failure to conduct an adequate area radiation survey to evaluate the magnitude and extent of radiation levels for an area located in the Radwaste Facility is a performance deficiency. This finding is more than minor because it is

associated with the Occupational Radiation Safety cornerstone attribute of exposure control and monitoring and it affected the associated cornerstone objective because the failure to conduct an adequate area radiation survey to evaluate the magnitude and extent of radiation levels for an area located in the Radwaste Facility did not ensure the adequate protection of worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. The finding was evaluated using the IMC 0609, Appendix C, and was determined to be of very low safety significance. The cause of this finding is related to the cross-cutting aspect of radiological safety in the work control component of Human Performance because the licensee did not conduct an adequate area radiation survey to evaluate the magnitude and extent of radiation levels for an area located in the Radwaste Facility. [H.3(b)] (Section 2RS1)

Inspection Report# : [2010003](#) (*pdf*)

**Significance:**  Dec 31, 2009

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **Failure to Comply with Radiological Postings and the Requirements for Entering a Posted High Radiation Area**

A self-revealing Green NCV of Technical Specification 5.4.1, Procedures, was identified for the failure to read and comply with all radiological postings and, prior to entering a high radiation area, attend a documented radiation protection briefing, know the radiological conditions in the area, and log onto a Radiation Work Permit that allows entry into a high radiation area, as required by procedure Nuclear Site Directive (NSD) 507, Radiation Protection (RP). The licensee has entered this violation into the corrective action program as PIP O-09-5609.

The failure to follow the requirements of NSD 507 with respect to radiological postings and entry into high radiation areas was a performance deficiency. This finding is greater than minor because it is associated with the Occupational Radiation Safety Cornerstone attribute of Program and Process (Exposure Control) and adversely affected the cornerstone objective of ensuring adequate protection of worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. The finding was evaluated using the Occupational Radiation Safety Significance Determination Process and determined to be of very low safety significance (Green) because it was not related to As Low As Reasonably Achievable (ALARA) planning, did not involve an overexposure or substantial potential for overexposure, and the ability to assess dose was not compromised. The cause of this finding was directly related to the cross-cutting aspect of human performance and error prevention under the work practices component in the area of Human Performance, because the security personnel failed to use self-checking prior to passing through the Unit 1/Unit 2 fuel receiving bay door into the posted high radiation area [H.4(a)]. (Section 2OS1)

Inspection Report# : [2009005](#) (*pdf*)

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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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