

# Palo Verde 3

## 2Q/2010 Plant Inspection Findings

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### Initiating Events

**Significance:**  Mar 31, 2010

Identified By: Self-Revealing

Item Type: FIN Finding

#### **Failure to Take Corrective Actions for an Identified Adverse Condition**

A self-revealing finding was identified for the failure of engineering personnel to follow procedures and adequately evaluate an identified adverse condition for corrective actions associated with containment isolation valve UV002 as required by Procedure 90DP-0IP10, "Condition Reporting" and Procedure 86DP-0EE01, "Reliability Centered Maintenance Based System Reviews." Specifically, the licensee identified during a cause analysis performed in 1997 and by a system review conducted in 2004 and 2007 that the failure of containment isolation valve UV002 could result in a reactor trip, but failed to take any corrective actions. This issue was entered into the licensee's corrective action program as Condition Report Disposition Request 3411547 which included corrective actions to evaluate the condition in accordance with station procedures and plan a modification to eliminate the adverse condition associated with containment isolation valve UV002.

The finding was more than minor because it affected the design control attribute of the Initiating Events Cornerstone, and affected the cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety function during shutdown as well as power operations. Using Manual Chapter 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," the finding was determined to have very low safety significance because the finding did not contribute to both the likelihood of a reactor trip and mitigating equipment or functions would not be available. This finding was evaluated as not having a crosscutting aspect because the performance deficiency is not indicative of current performance.

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

**Significance:**  Dec 31, 2009

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Inadequate Procedures to Diagnose and Mitigate a Loss of Instrument Air to the Containment**

A self-revealing noncited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified for the failure of operations personnel to adequately establish and implement procedures associated with a loss of instrument air to containment. Specifically, on December 3, 2009, the alarm response and abnormal operating procedures available to the Unit 3 control room operating staff were inadequate to consistently diagnose and mitigate a loss of instrument air to containment. This issue was entered into the licensee's corrective action program as Condition Report/Disposition Request (CRDR) 3411457.

The performance deficiency associated with this finding involved the failure of operations personnel to adequately establish and implement alarm response and abnormal operating procedures associated with a loss of instrument air to containment. The finding is more than minor because it is associated with the procedure quality attribute of the Initiating Events Cornerstone and affects the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Using Manual Chapter 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," the finding was determined to have very low safety significance because the finding did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available. This finding has a crosscutting aspect in the area of problem identification and resolution associated with the corrective action program because the licensee failed to implement the corrective action program with a low threshold for identifying issues.

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

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## Mitigating Systems

**Significance:**  Mar 31, 2010

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **ADV Drop Test Failure Due to Foreign Material**

A self-revealing noncited violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified for the failure of maintenance personnel to prevent the introduction of foreign material into the atmospheric dump valve nitrogen system as required by Procedure 30DP-9MP03, "System Cleanliness and Foreign Material Exclusion Controls." Specifically, on January 10, 2010, atmospheric dump valve 3-ADV-184 failed the nitrogen accumulator drop test when leakage exceeded an acceptance criterion which was caused by a check valve leaking by due to the presence of foreign material during maintenance. This issue was entered into the licensee's corrective action program as Palo Verde Action Request 3425640 which included corrective actions to flush the nitrogen lines for all the ADV's and train maintenance personnel on the foreign material exclusion requirements.

The finding was more than minor because it affected the equipment reliability attribute of the Mitigating Systems cornerstone, and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using Manual Chapter 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," the finding was determined to have a very low safety significance because the finding did not result in a loss of system safety function, an actual loss of safety function of a single train for greater than its technical specification allowed outage time, or screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding was evaluated as not having a crosscutting aspect because the performance deficiency is not indicative of current performance.

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

**Significance:**  Dec 31, 2009

Identified By: NRC

Item Type: VIO Violation

### **Failure to Establish Adequate Procedures to Control Potential Tornado Borne Missile Hazards Near the Essential Spray Ponds**

The inspectors identified a cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure of engineering personnel to establish adequate procedures to ensure evaluation and approval of transient missile hazards that have an effect on the operability of the essential spray ponds. Specifically, since January 15, 1997, civil engineering personnel failed to develop an adequate procedure to verify missile density criteria are not exceeded to ensure operability of the essential spray ponds during severe weather. Due to the licensee's failure to restore compliance from the previous NCV 05000528/2008004-04 within a reasonable time, this violation is being cited in a Notice of Violation consistent with Section VI.A of the NRC Enforcement Policy. This issue was entered into the licensee's corrective action program as CRDR 3397839.

The finding is more than minor because it is associated with the external factors attribute of the Mitigating Systems Cornerstone and affects the cornerstone objective of ensuring the reliability of systems that respond to initiating events to prevent undesirable consequences. Using Manual Chapter 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," the finding was determined to have very low safety significance because the finding did not result in a loss of system safety function, an actual loss of safety function of a single train for greater than its technical specification allowed outage time, or screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding has a crosscutting aspect in the area of problem identification and resolution associated with the corrective action program because appropriate corrective actions were not taken to address safety issues and adverse trends in a timely manner, commensurate with their safety significance and complexity.

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

**Significance:**  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Correct a Condition Adverse to Quality with the Emergency Diesel Generator Train A K-4 Relay in a Timely Manner**

The inspectors identified a noncited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for the failure of the licensee to correct a deficiency associated with the emergency diesel generator voltage regulator K-4 relay in a timely manner. Specifically, on October 16, 2004, maintenance personnel identified that the K-4 relay had a high resistance of approximately 800 ohms but did not replace the relay as required by procedures. This resulted in the failure of the emergency diesel generator to start following maintenance activities on May 7, 2009. This issue was entered into the licensee's corrective action program as Palo Verde Action Request 3385257.

The finding is more than minor because it is associated with equipment performance attribute of the Mitigating Systems Cornerstone and affects the associated cornerstone objective to ensure the reliability and capability of systems that respond to initiating events. Using Manual Chapter 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," the finding was determined to require a Phase 2 and Phase 3 analysis by a senior reactor analyst, because the finding resulted in an actual loss of safety function of a single train for greater than its technical specification allowed outage time. Based on the analysis performed, the analyst concluded that the finding had very low safety significance because with only three failures of the K-4 relay in approximately 170 starts and crediting seven hours for the station batteries during a loss of offsite power event, the resulting core damage frequency is  $3.8E-7$ . This finding was evaluated as not having a crosscutting aspect because the performance deficiency is not indicative of current performance.

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

**Significance:**  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

**Ineffective Corrective Actions for Vaults Containing Station Blackout Cables**

The team identified a noncited violation of very low safety significance for failure to effectively implement the corrective action requirements of Regulatory Guide 1.155, "Station Blackout," Appendix A, Criterion 8, "Corrective Action," which were adopted by the licensee in order to meet 10 CFR 50.63, "Loss of All Alternating Current." Although the licensee started a vault monitoring program for water intrusion in vaults with electrical cables in 2003, the effort to prevent exposure of medium voltage cables to submerged conditions has been ineffective for certain vaults that contain the 15kV station blackout generator output cables. Additionally, there are 27 splices in these cables which have contributed to cable test failures in previous meggar resistance tests that, in some cases, required splice replacement in order to pass resistance tests. The licensee entered this issue into their corrective action program as Palo Verde Action Requests 3350712, 3350713, 3350939, and 3352858.

This finding is more than minor because it is associated with the design control and equipment performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The risk significance of this finding was determined using Inspection Manual Chapter 0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings." The finding is of very low safety significance (Green) since the finding did not result in a loss of operability, a loss of system safety function, an actual loss of safety function of a single train for greater than its technical specification allowed outage time, or an actual loss of safety function for greater than 24 hours and the finding did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. The finding was reviewed for crosscutting aspects and none were identified.

Inspection Report# : [2009008](#) (pdf)

**Significance:**  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Perform an Adequate Operability Evaluation for the Condensate Storage Tank**

The team identified a Green noncited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure to perform an adequate operability evaluation for the condensate storage tank as required by site procedures. Specifically, upon discovery of the condition, the licensee performed an immediate operability determination evaluation based on concerns with the capability of the loop seal to provide protection from vacuum conditions. Subsequently, the licensee performed additional assessments of their overall program which included the specified operability evaluation in a component design bases review and closure of a confirmatory action letter and failed to identify the inadequacy. During the inspection, the team reviewed the operability determination and identified that the licensee failed to consider or identify concerns with the ability of the condensate storage tank pressure relief valves to operate after a design basis earthquake. The licensee entered this issue into their corrective action program as Palo Verde Action Request 3353683.

This finding is more than minor because it is associated with the protection against external events (seismic) attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The risk significance of this finding was determined using Inspection Manual Chapter 0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings." The finding is of very low safety significance (Green) since the finding did not result in a loss of operability, a loss of system safety function, an actual loss of safety function of a single train for greater than its technical specification allowed outage time, or an actual loss of safety function for greater than 24 hours and the finding did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding has a crosscutting aspect in the area of problem identification and resolution associated with the corrective action program since the licensee failed to properly evaluate for operability.

Inspection Report# : [2009008](#) (*pdf*)

**Significance:**  Sep 30, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Incorporate Vendor Information for Reactor Trip Breakers**

The team identified a Green noncited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," with programmatic implications for the licensee's failure to follow site procedures and incorporate updated vendor information for the reactor trip breakers. Specifically, the licensee failed to incorporate an updated revision of the maintenance program manual and at least two technical bulletins from the reactor trip breaker vendor. The licensee entered this issue into their corrective action program as Palo Verde Action Requests 3354252 and 3355082.

This finding is more than minor because it is associated with the equipment performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The risk significance of this finding was determined using Inspection Manual Chapter 0609, Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings." The finding is of very low safety significance (Green) since the finding did not result in a loss of operability, a loss of system safety function, an actual loss of safety function of a single train for greater than its technical specification allowed outage time, or an actual loss of safety function for greater than 24 hours and the finding did not screen as potentially risk significant due to a seismic, flooding, or severe weather initiating event. This finding has a crosscutting aspect in the area of problem identification and resolution associated with operating experience since the licensee failed to implement changes to station processes, procedures, equipment, and training programs.

Inspection Report# : [2009008](#) (*pdf*)

**Significance:**  Aug 12, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Follow Foreign Material Exclusion Requirements**

The inspectors identified a noncited violation of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures and

Drawings," for the failure to adequately implement foreign material controls during maintenance. Specifically, on May 21, 2008, maintenance and quality control personnel failed to ensure that no foreign material entered the fuel injection pump 7R during refurbishment. As a result, fuel injection pump 7R seized in place, rendering emergency diesel generator 3A inoperable and unavailable for 31.5 days. This issue was entered into the licensee's corrective action program as Palo Verde Action Request 3280474.

The finding is more than minor because it is associated with the equipment performance attribute of the mitigating systems cornerstone and affects the cornerstone objective of ensuring the reliability of systems that respond to initiating events to prevent undesirable consequences. Using Manual Chapter 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," the finding was determined to require a Phase 2 analysis because the finding resulted in an actual loss of safety function of a single train for greater than its technical specification allowed outage time. Using the Palo Verde pre-solved sequences and an exposure time of 3 to 30 days with one emergency diesel generator unavailable, the Phase 2 estimation determined this finding was of low to moderate significance. With credit for battery operation for seven hours, the Phase 3 analysis determined that the total delta core damage frequency from all of the combined scenarios was 5 E-7; and thus, the finding was considered to be of very low safety significance (Green). This finding has a crosscutting aspect in the area of human performance associated with decision making because the licensee did not communicate bases for decisions to personnel with a need to know such that work is performed safely, in a timely manner [H.1(c)]

Inspection Report# : [2009010](#) (pdf)

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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

**Significance:** SL-IV Dec 31, 2009

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Periodically Update the UFSAR**

The inspectors identified a noncited violation of 10 CFR 50.71 "Maintenance of Records," because the licensee failed to update their updated final safety analysis report with submittals that include the effects of a change made to the facility. Specifically, the licensee built the old steam generator storage facility on the owner controlled area for long-term radwaste storage of six decommissioned steam generators and three reactor vessel heads and failed to update the updated final safety analysis report to include these changes to the facility and all safety analyses and evaluations performed. This issue was entered in the licensee's corrective action program as CRDR 3398042.

This issue was dispositioned using traditional enforcement because it had the potential for impacting the NRC's ability to perform its regulatory function. The finding is more than minor because it has a material impact on licensed activities in that the six decommissioned steam generators and the Unit 2 reactor vessel head, with a significant radioactive source term have been relocated from the plant radiological controlled area to the owner controlled area. In addition, the radwaste management program was affected because the licensee determined that this low-level radwaste facility will store these large components until the site is decommissioned. The finding is characterized as a

Severity Level IV, noncited violation in accordance with NRC Enforcement Policy, Supplement I, and was treated as a noncited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. This finding was reviewed for crosscutting aspects and none were identified because the performance deficiency is not indicative of current performance.

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

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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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