

# Dresden 3

## 4Q/2010 Plant Inspection Findings

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### Initiating Events

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Provide An Adequate Procedure for Several Instrument Maintenance Surveillance Tests**

The inspectors identified a NCV of Technical Specification (TS) 5.4.1 for the failure to provide an adequate procedure for the verification of correct installation and restoration of equipment during an instrument maintenance surveillance test in May 2010. The licensee's corrective actions included a task to add requirements for an independent verification of the removal of volt ohm meters (VOMs) in the ohm meter mode in 17 affected procedures. The licensee entered this finding into the corrective action program as issue report (IR) 1068559.

Using IMC 0612, Appendix E, "Examples of Minor Violations," issued on September 20, 2007, the inspectors determined that there were no similar examples to this finding in Appendix E. The inspectors referenced IMC 0612, Appendix B, "Issue Screening," dated January 1, 2010. The inspectors determined that the finding was more than minor based on Block 9, Figure 2, paragraph 2.b, "If left uncorrected, would the finding become a more significant safety concern." The inspectors determined that the failure to perform an independent verification that a testing configuration had been returned to normal could result in the inability of a system or component to perform its function which would be a more significant safety concern. No systems had been incorrectly returned to service as a result of the inadequate procedure and, therefore, this violation had very low safety significance. This finding had a cross cutting aspect in the area of Problem Identification and Resolution - Corrective Actions because the licensee did not address a previously identified safety issue in a timely manner.

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

**Significance:**  Jun 30, 2010

Identified By: Self-Revealing

Item Type: FIN Finding

#### **Failure To Perform An Adequate Inspection of Circulating Water Valve 3 4402 C**

On January 22, 2010, a finding of very low safety significance was self revealed for failure to perform an adequate inspection of the grease condition of the 3 4402 C valve actuator HBC gear box, which was contrary to the requirements of MA AA 723 301,"Periodic Inspection of Limitorque Model SMB/SB/SBD 000," Revision 3. No violation of regulatory requirements occurred because valve 3 4402 C was a nonsafety-related component. The licensee planned to drill inspection ports into and/or replace the HBC gear boxes for valves 2/3 34403 A(B)(C)(D) and 2/3 34402 A(B)(C)(D) and 2 34402 C and change the preventive maintenance requirement to perform a 12 year mechanical inspection of the HBC gear box. This finding was placed in the licensee's corrective action program as IR 1034444, "Failure of the 3 4402 C Condenser Inlet Valve."

The finding was determined to be more than minor because the finding could be reasonably viewed as a precursor to a significant event. Specifically, valve 3 4402 C acted as an inlet in the circulating water system for the south water box. When the valve failed, it was almost completely closed. Had the valve failed open, circulating water would have been diverted from the condenser potentially causing a loss of vacuum that would have resulted in a reduction in power and/or a turbine trip and reactor trip. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a, Initiating Events Cornerstone Column, Transient Initiators question 1, does the finding contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions will not be available, was answered "no," and, therefore, screened as Green. This finding had no cross cutting aspect due to the issues involved in this valve failure were not indicative of current performance.

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

**Significance:**  Mar 31, 2010

Identified By: Self-Revealing

Item Type: FIN Finding

### **Electro Hydraulic Control (EHC) Fluid Leaking From Stop Valve 3-5699-MSV4-FA Resulting in Forced Outage D3F49**

The failure of the Unit 3 Main Turbine Stop Valve (MSV) # 4 fast acting solenoid valve on November 6, 2009, resulted in a self revealed finding of very low safety significance. The licensee failed to use the correct o rings and bolts when replacing the Unit 3 MSV #4 fast acting solenoid valve during the Unit 3 refueling outage in 2008 which led to the failure. The equipment was not safety related. Therefore, this finding did not result in a violation of regulatory requirements. The licensee's corrective actions included revising maintenance procedure DEP 5600 01, "Main Turbine Valve Solenoid and Servo Maintenance," to incorporate the actions described in GE Technical Information Letter 1594. The bolts on the U3 and U2 solenoid valves were replaced. The licensee did not determine that the o rings were defective until after both this Unit 3 forced outage and the Unit 2 November 2009 refueling outage were complete. Therefore, one corrective action was to write a work order to change the o rings on the solenoids for both units. In addition, corrective actions were put in place to address weaknesses in the evaluation of Operating Experience. The licensee addressed this issue in the corrective action program under Issue Reports 899829 and 989733.

The inspectors determined that the use of o rings, GE part number U472X000B906, in U3 turbine control valve solenoids, was contrary to Vendor Technical Information Program Binder D1180, General Electric Steam Turbine Generator (GEK5551), Tab 8, GE drawing 115D2402 (Revision 12), and GE Technical Information Letter (TIL) 1594, dated November 30, 2007, which required the use of o rings, GE part number U472X000BS906, and was a performance deficiency. The finding was determined to be more than minor because the finding was associated with the Initiating Events Cornerstone attribute of procedure quality and affected the cornerstone objective of limiting the likelihood of those events that upset plant stability. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a, for the Initiating Events Cornerstone. The electro hydraulic control leakage caused by one or more failed o rings could have resulted in a turbine trip and reactor scram. However, the failure would not affect mitigating equipment or functions so the finding screened as having very low safety significance. This finding had a cross cutting aspect in the area of Problem Identification and Resolution, Operating Experience because the licensee did not implement and institutionalize Operating Experience through changes to station processes, procedures, equipment, and training programs.

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

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## **Mitigating Systems**

**Significance:**  Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Provide Robust Indication of Adequate Oil Level in High Pressure Coolant Injection Booster Pump Sight Glasses**

The inspectors identified a Non-Cited Violation of Technical Specification 5.4.1 for the licensee's failure to implement the section of the high pressure coolant injection (HPCI) booster pump maintenance procedure that prescribes how to robustly mark the HPCI booster pump sight glasses to indicate the acceptable oil levels for the bearings of the Unit 2 and 3 HPCI booster pumps. Upon being informed of the condition, the licensee verified, using measurements, that the oil level for the bearings was adequate and entered the condition in their corrective action program to provide a more robust indication of the acceptable oil level.

This finding is of greater than minor safety significance because if left uncorrected, it has the potential to lead to a more significant safety concern. Specifically, if a more robust minimum level indication is not used, the wires could slide down the sight glass to the point that they do not prevent operators from allowing the oil level to drop below the minimum acceptable level for the pump to perform its safety function. The finding impacted the Mitigating Systems Cornerstone because it involved degradation of HPCI. It is not greater than Green because it did not result in the loss of operability of the HPCI system. The inspectors determined that this finding has a cross cutting aspect in the area of Problem Identification and Resolution under the component Corrective Action Program because the licensee did not take appropriate corrective actions to address safety issues in a timely manner, commensurate with their safety significance and complexity. P.1(d)

**Significance:**  Dec 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform Magnetic Particle Examination on the 3/2/1501-20/20-10 U3 LPCI Support in Accordance with Procedures**

A finding of very low safety significance (Green) and associated Non-Cited Violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the failure to accomplish activities affecting quality in accordance with procedures. Specifically, the licensee's vendor non-destructive examination (NDE) examiner failed to perform a magnetic particle (MT) examination in accordance with procedures on the 3/2/1501-20/20-10 Unit 3 low pressure coolant injection support. The licensee initiated corrective action document IR 01135770 to address the issue.

The finding was determined to be more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. The failure to perform an adequate MT examination could have allowed undetected flaws to remain in service. This finding is of very low safety significance (Green) because the inspectors answered no to all of the characterizations worksheet questions in Table 4a of MC 0609.04. Specifically, no indications were identified when the examination was re-performed. This finding has a cross-cutting aspect in the area of Human Performance for the Work Practices component because the licensee proceeded in the face of uncertainty and unexpected circumstances by continuing to perform the examination after the equipment became damaged. The licensee's examiner also elected to continue after identifying there was material present on the pipe in a location that could interfere with the exam. In addition, due to different circumstances surrounding the exam such as: component location, equipment weight, and environmental conditions, the examiner became tired. Nonetheless, the examiner elected to continue to perform the examination in this condition. H.4(a)

Inspection Report# : [2010005](#) (pdf)

**Significance:**  Sep 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Identify and Correct Test Procedures to Assess the As-Found Trip Setpoint for Pressure Switches that Satisfy Technical Specification Functions**

The inspectors identified a finding of very low safety significance (Green) and associated NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee's failure to assure that conditions adverse to quality associated with pre-conditioning were promptly identified and corrected. The licensee's corrective actions included actions for Engineering to evaluate all the Technical Specification functions that do not have test valves installed on their pressure switches and justify the potential unacceptable preconditioning as acceptable or take other actions as appropriate. The licensee entered this finding into the corrective action program as issue report (IR) 1120159.

The finding was determined to be more than minor because it impacted the Mitigating Systems Cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors did not identify any cross-cutting aspect associated with this finding. The inspectors evaluated the finding using IMC 0609, "Significance Determination Process," Attachment 4, "Phase 1 – Initial Screening and Characterization of Findings." The inspectors answered "No" to all questions in the Mitigation System Cornerstone column of Table 4a, "Characterization Worksheet for IE, MS, and BI Cornerstones," therefore, the finding screened as Green (very low safety significance).

Inspection Report# : [2010004](#) (pdf)

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**LPCI Room Heat up Calculation Deficiencies**

The inspectors identified a NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," having very low safety significance (Green) related to whether the equipment in the low pressure coolant injection (LPCI) corner rooms would remain within environmental qualification limits during a design basis loss of coolant accident.

Specifically, the licensee's heat up calculation contained discrepancies and failed to evaluate the worst case effects post-extended power uprate when determining the heat up in the LPCI corner rooms. This finding was entered into the licensee's corrective action program as AR00763663, AR00742158, AR00883207, AR01055863, and AR01060243, and an operability call performed by the licensee concluded that there are sufficient conservatisms in the calculation that equipment in the corner rooms remained operable.

The finding was more than minor because it was associated with the attribute of design control, which affected the Mitigating Systems Cornerstone objective of ensuring the availability and reliability of safety related systems. This finding is of very low safety significance (Green) because the design deficiency was confirmed not to result in loss of operability or functionality. The inspectors did not identify a cross cutting aspect associated with this finding because this was a legacy design issue and, therefore, was not reflective of current performance.

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

**Significance:**  Jun 30, 2010

Identified By: NRC

Item Type: FIN Finding

### **Failure to Monitor Unit 3 Drywell Temperature**

A finding of very low safety significance was identified by the inspectors on May 3, 2010, for the failure to monitor Unit 3 (U3) drywell temperature per commitments made to the NRC within LER 88 22, Supplement 2 to ensure that equipment in the drywell was operating within environmental qualification limits. No violation of regulatory requirements occurred. The licensee's corrective actions were to reinstate the temperature monitoring of both drywells, perform walkdowns of both drywells for correct placement and to verify functionality of drywell thermocouples, improve administrative requirements on plant engineering turnover from one engineer to another, and train engineers to focus on identifying and validating assumptions when performing or reviewing technical products. This finding was placed in the licensee's corrective action program as IR 1064681.

The finding was determined to be more than minor because the finding was associated with the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective of ensuring the reliability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to monitor drywell temperatures and evaluate those temperatures against environmental qualification limits would have resulted in the motor operator for valve 3 1301 1 to exceed its qualified life without the licensee's knowledge after D3R21.

The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a for the Mitigating Systems Cornerstone. The inspectors were able to answer the first question, is the finding a design or qualification deficiency confirmed not to result in loss of operability or functionality, "yes" and, therefore, the finding screened as Green. The inspectors did not identify a cross cutting aspect associated with this finding because the age of the finding did not reflect current performance.

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

**Significance:**  Jun 30, 2010

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

### **2/3 Emergency Diesel Generator (EDG) Overvoltage during Division I Undervoltage**

A finding of very low safety significance (Green) and associated NCV of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criterion XI, "Test Control," was self revealed on November 16, 2009, for the failure to perform adequate post modification testing which allowed an improper wiring condition to exist for years before an inappropriate action by a nuclear station operator exposed the problem. The licensee generated issue report 994101 to address this issue. Corrective actions implemented by the licensee to address this issue included correcting the improper wiring configuration and creating a training request to have enhanced post maintenance testing requirement training given to all plant engineers, design engineers and maintenance work planners.

Using IMC 0612, Appendix B, "Issue Screening," the inspectors determined that the finding was more than minor because it impacted the Mitigating Systems Cornerstone attribute of procedure quality to ensure the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors completed a Phase 1 significance determination of this issue using IMC 0609, Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of Findings." The inspectors answered "no" to all questions in the Mitigating Systems Cornerstone column of Table 4a, "Characterization Worksheet for IE, MS, and BI Cornerstones." Therefore, the finding screened as Green (very low safety significance). Because the behavior leading to this event



occurred in 1986, the inspectors determined that this event was not indicative of current performance and, therefore, no cross cutting area was affected.

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

**Significance:**  May 21, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Establish Heat Exchanger Inspection Procedures Appropriate for the Circumstances**

The inspectors identified a Non-Cited Violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” having very low safety significance for the failure to establish inspection procedures that were appropriate for the circumstances for the NRC Generic Letter (GL) 89-13 program heat exchangers. Specifically, procedures did not contain adequate guidance for partially blocked heat exchanger tubes found to be completely blocked. As a result, the licensee did not evaluate the as-found conditions of the 2/3 Emergency Diesel Generator (EDG) jacket water heat exchangers; therefore, did not determine the heat exchangers were not bounded by applicable design documents. The licensee entered this issue into its corrective action program.

The performance deficiency was determined to be more than minor because it was associated with the mitigating system cornerstone attribute of procedure quality and affected the cornerstone objective. This finding was of very low safety significance because it was a qualification deficiency confirmed not to result in loss of operability or functionality. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance because the licensee did not use a conservative assumption in decision making. Specifically, the licensee did not use a conservative assumption when establishing the acceptance criteria for the inspection of heat exchangers. H.1(b)

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

**Significance:**  May 21, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Improper Reclassification of LPCI Pump Mechanical Seals**

The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion II, “Quality Assurance Program,” for improperly classifying Low Pressure Coolant Injection (LPCI) pump mechanical seals as non-safety-related. The licensee subsequently concluded that the seals should be classified as safety-related based upon Exelon procedure SM-AA-300 and parts classification Guide M-1994-300, and reclassified them as safety-related.

The performance deficiency was determined to be more than minor because if left uncorrected, it would become a more significant safety concern. This finding was of very low safety significance because it was a qualification deficiency confirmed not to result in loss of operability or functionality. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance because the licensee did not adopt a requirement to demonstrate that the proposed action is safe in order to proceed rather than a requirement to demonstrate that it is unsafe in order to disapprove the action. H.1(b)

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

**Significance:**  May 21, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform Adequate Testing to Confirm Acceptable Fast Bus Transfer Time**

The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion XI, ATest Control,@ for the failure to have an adequate post-maintenance test for circuit breakers to confirm fast bus transfer capability. Specifically, the licensee failed to ensure that either vendor overhaul procedures or the station procedure for receipt inspection confirmed that breaker timing tests were performed after the circuit breakers were overhauled at a vendor facility. The licensee entered this issue into its corrective action program.

The finding was more than minor because if left uncorrected, the finding could have the potential to lead to a more significant safety concern. This finding was of very low safety significance (Green) because the test deficiency was confirmed not to result in loss of operability or functionality. The inspectors did not identify a cross-cutting aspect

associated with this finding because it was not reflective of current performance.

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

**Significance:**  Mar 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Significance of Potentially Submerged Safety and Non safety-related Low Voltage Power and Control Power Cables**

The inspectors identified a finding of very low safety significance with an associated Non Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control." Specifically, licensee personnel failed to maintain safety related cables in underground manholes from becoming repeatedly submerged, which resulted in subjecting the cables to an environment for which they were not qualified. As corrective action, the licensee generated work order (WO) 01271108 on September 24, 2009, to remove the seals on the conduit which contained the cables and which kept water from draining out of the conduit. This issue was entered into the licensee's corrective action program as Issue Report (IR) 975308.

The finding was determined to be more than minor because the finding was associated with the Mitigating Systems Cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding was of very low safety significance because it was a qualification deficiency that did not result in a loss of operability. The inspectors concluded that there was not a cross cutting issue associated with this violation.

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

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## **Barrier Integrity**

**Significance:**  Nov 19, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Perform an Ultrasound Thickness Measurement of the Drywell liner in accordance with procedures (40A5.1.b(1))**

A finding of very low safety-significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the failure to accomplish activities affecting quality in accordance with procedures. Specifically, the licensee non-destructive examination (NDE) examiner failed to perform an Ultrasound Thickness Measurement of the drywell liner in accordance with procedures. The licensee initiated corrective action document AR 01141740 to address the issue.

The finding was determined to be more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically by failing to perform an adequate Ultrasound Thickness Measurement of the drywell liner potential degradation could have gone undetected. This finding is of very low safety-significance (Green) because the inspectors answered no to all of the characterizations worksheet questions in Table 4a of MC 0609.04. The inspectors determined this finding had no associated cross-cutting aspect because none of them represented the underlying cause for this violation to occur. (Section 40A5.1)

Inspection Report# : [2010010](#) (pdf)

**Significance:**  Sep 30, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

### **Installation of Nonconforming Material into a Safety Related System**

The inspectors identified a finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion XV, "Nonconforming Materials, Parts, or Components" for the installation of a commercially dedicated part for use in a safety-related system which failed testing acceptance criteria on October 6, 2008. The licensee's corrective actions included replacing the nonconforming material on November 11, 2009. The licensee

made procedure changes to clarify the requirements for documentation of the technical justification of accepting discrepancies. The licensee entered this finding into the corrective action program as issue report (IR) 1068559.

The finding was determined to be more than minor because the finding was similar to IMC 0612, Appendix E, Example 5c (dated August 11, 2009). The inspectors determined the finding could be evaluated using IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of Findings," Table 4a for the Barrier Integrity Cornerstone. The inspectors answered all four questions in Table 4a, "No," therefore, the inspection finding screened as having very low safety significance. This finding has a cross-cutting aspect in the area of Human Performance - Decision Making. Specifically, there was a systematic process to ensure that discrepancies identified in the commercial grade dedication process were properly resolved, which was not followed. H.1(a)

Inspection Report# : [2010004](#) (pdf)

**Significance:**  Mar 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Follow Technical Specification 5.5.4 Implementing Procedure**

• The inspectors identified a finding of very low safety significance and associated Non Cited Violation of Technical Specification 5.5.4 for the licensee failing to follow Step I.2.a and b of Procedure DOS 1500 08, "Discharge of Containment Cooling Service Water (CCSW) From Low Pressure Coolant Injection (LPCI) Heat Exchanger (Hx) During CCSW Pump Operations," Revision 16. Specifically, the licensee failed to perform a tube leak test as required by DOS 1500 08 when activity exceeded  $1.5E 6$  microcuries/milliliter. The licensee's corrective actions included a change to DOS 1500 08 to ensure personnel do not waive performance of the test procedure until tube leak checks are considered during non routine samples of CCSW and revising the chemistry sampling procedure CY DR 110 220, "LPCI Service Water (CCSW) and Torus Water Sampling," to notify operations to evaluate performance of a tube leak check if activity exceeds  $1.5E 6$  microcuries/milliliter.

The inspectors determined that the failure to perform a tube leak test or perform Calculated CCSW Sample Activity Limit and Canal Activity Calculations was contrary to DOS 1500 08, and was a performance deficiency. The finding was determined to be more than minor because the finding, if left uncorrected, would become a more significant safety concern. Specifically, had there been an actual LPCI Hx tube leak radioactivity could have been released. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a for the Containment Barrier Cornerstone. All four questions on this table were answered "no." There was no actual degradation of the containment barrier. Therefore, the issue screened as having very low safety significance. This finding had a cross cutting aspect in the area of Human Performance, Decision Making because the licensee did not demonstrate that the proposed action was safe in order to proceed rather than a requirement to demonstrate that it was unsafe in order to disapprove the action. Specifically, the licensee assumed the activity in the sample was coming from the floor drain system with no valid proof that was the case.

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

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## **Emergency Preparedness**

**Significance:**  Mar 31, 2010

Identified By: NRC

Item Type: FIN Finding

#### **Failure to Meet Regulatory Commitment to Maintain Contingency Plans for Post-Accident Sampling**

The inspectors identified a finding of very low safety significance for the failure to meet a regulatory commitment to maintain a contingency plan for obtaining highly radioactive samples of reactor coolant, the suppression pool, and drywell atmosphere for post accident plant recovery planning. Specifically, the licensee's contingency plan was not adequately maintained to ensure the High Radiation Sampling System (HRSS) functioned adequately or otherwise was demonstrated to be in a state of readiness to allow samples to be obtained within a two week window. No violations of regulatory requirements were identified related to this finding. Corrective actions were being developed to ensure the licensee's contingency plan commitments would be met. Those actions included a means to improve

system ownership and establishment of an effective process for HRSS equipment maintenance and repair at a priority consistent with its intended use.

The finding was more than minor because it impacted the facilities and equipment attribute of the Emergency Preparedness Cornerstone and adversely affected the cornerstone objective of ensuring capability to implement adequate measures to protect health and safety of the public in the event of a radiological emergency. Specifically, equipment intended to obtain highly radioactive samples that are used to assess reactor core condition as part of post accident recovery activities was not demonstrated to be in a readiness condition consistent with the licensee's contingency plan. The finding was determined to be of very low safety significance because it involved equipment, which supplements the licensee's emergency plan for reentry and recovery activities as provided in the planning standard of 10 CFR 50.47(b)(8), and represented a planning standard problem associated with demonstrating functional readiness of that equipment. The finding was determined to be associated with a cross cutting aspect in the area of human performance in the resources component, in that, the licensee failed to ensure that equipment to support its emergency plan was functional or otherwise was demonstrated to meet a defined status of operational readiness. Inspection Report# : [2010002](#) (*pdf*)

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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

**Significance:** SL-IV Mar 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Record the Identity of Personnel Performing Post Maintenance Tests affecting NRC's regulatory process.**

An issue affecting the NRC's regulatory process and associated NCV of 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records," was identified by the inspectors for the licensee's failure to record the identity of various personnel who performed seven post-maintenance tests (PMTs) related to Unit 3 EDG maintenance. Despite the PMTs being related to work on safety related components, an activity affecting quality, neither the licensee's procedure MA AA 716 012, "Post-Maintenance Testing," nor DAP 15 10, "Post-Maintenance Testing Program," required the identity of the inspector or tester to be recorded. Completed corrective actions included adding PMT documentation requirements to DAP 15 10 and briefing individuals who perform PMTs.

The Enforcement Policy was used to screen the severity. From the Enforcement Policy, the finding affected the "Miscellaneous Matters" activity and involved noncompliance with NRC requirements that were not considered significant based on risk. Further, Supplement VII of the Enforcement Policy screened the severity of the violation as Severity Level IV because the violation was similar to the Severity Level IV example D.2: "Information that the NRC requires be kept by a licensee and that is incomplete and of more than minor significance."

The performance deficiency portion of this issue is tracked as item 2010-002-06.



**Significance:**  Mar 31, 2010

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Record the Identity of Personnel Performing Post-Maintenance Tests - performance deficiency portion.**

A finding of very low safety significance (green0 and associated NCV of 10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records," was identified by the inspectors for the licensee's failure to record the identity of various personnel who performed seven post-maintenance tests (PMTs) related to Unit 3 EDG maintenance. Despite the PMTs being related to work on safety related components, an activity affecting quality, neither the licensee's procedure MA AA 716 012, "Post-Maintenance Testing," nor DAP 15 10, "Post-Maintenance Testing Program," required the identity of the inspector or tester to be recorded. Completed corrective actions included adding PMT documentation requirements to DAP 15 10 and briefing individuals who perform PMTs.

This finding was determined to be more than minor because the finding was similar to IMC 0612, Appendix E examples 1b since a portion of required records were irretrievably lost, and 2h since multiple examples were identified as failures to properly implement the same regulatory requirement. Since MA AA 716 012, "Post-Maintenance Testing," did not properly implement regulatory requirements, this finding has a cross-cutting aspect in the area of Human Performance, Resources because the licensee did not provide complete, accurate, and up-to-date procedures to plant personnel. H.2(c) (Section 1R19)

The traditional enforcement portion of this is tracked as item 2010-002-01.

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

Last modified : March 03, 2011