

# Nine Mile Point 2

## 2Q/2011 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:**  Mar 31, 2011

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

#### **Inadequate Identification and Corrective Actions for Emergency Diesel Generator Temperature Control Valve Degradation**

A self-revealing finding of very low safety significance associated with a non-cited violation (NCV) of 10 CFR Part 50, Criterion XVI, "Corrective Action," was identified following a monthly surveillance test (ST) on January 18, 2011, when Unit 2 operators removed the Division I emergency diesel generator (EDG) from the grid due to rising jacket water cooling temperature. The condition resulted in an unplanned entry into a technical specification limiting condition for operation (LCO) and 23 hours of system unavailability. The inspectors determined that ineffective performance monitoring of the Division I EDG jacket water cooling system since April 2008 was a performance deficiency in that the degraded condition of the thermostatic control valve was reasonably within NMPNS' ability to foresee and correct. NMPNS entered this issue into its corrective action program (CAP), repaired the valve and enhanced the valve maintenance procedure to ensure smooth operation.

The finding was more than minor because it was associated with the 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. The finding was of very low safety significance because it was not a design or qualification deficiency, did not represent a loss of system/train safety function, and did not screen as potentially risk significant due to external events. The finding had a cross-cutting aspect in the area of problem identification and resolution, corrective action program, because NMPNS did not take appropriate correction actions to address an adverse trend in a timely manner, commensurate with its safety significance and complexity. Inspection Report# : [2011002](#) (*pdf*)

**Significance:**  Mar 30, 2010

Identified By: NRC

Item Type: FIN Finding

#### **Inadequate Maintenance Procedure Results in Loss of Loads for Non-Vital UPS**

A self-revealing finding of very low safety significance was identified for inadequate coordination during concurrent execution of a maintenance procedure and an operating procedure, which resulted in a loss of power to the loads supplied by Unit 2 uninterruptible power supply (UPS) 2VBB-UPS1A. The loss of operational capabilities, and alarm and display functions, complicated normal plant operations and impacted an "anticipated transient without scram" (ATWS) mitigation strategy. As immediate corrective action, maintenance on UPS1A was stopped pending causal evaluation of the event. The issue was entered into the corrective action program (CAP) as condition report (CR) 2009-8928.

The finding was more than minor because it was associated with the procedure quality 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. Additionally, the finding was significant because it would have impacted Nine Mile Point Nuclear Station's (NMPNS's) ability to execute emergency operating procedure N2-EOP-C5, "Failure to Scram," in that the reactor manual control system was not available for use in accordance with N2-EOP-6, Attachment 14, "Alternate Control Rod Insertions." The finding was

of very low safety significance because it was not a design or qualification deficiency, did not represent a loss of a system/train safety function, and did not screen as potentially risk significant due to external events. The finding had a cross-cutting aspect in the area of human performance, work control, because NMPNS did not address the impact of changes to the work activity on the plant and human performance.

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

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## Barrier Integrity

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## Emergency Preparedness

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## Occupational Radiation Safety

**Significance:**  Sep 30, 2010

Identified By: Self-Revealing

Item Type: FIN Finding

### **Failure to Maintain Radiation Exposure ALARA During RHR System Modification**

A self-revealing finding of very low safety significance was identified due to Nine Mile Point Nuclear Station (NMPNS) having unplanned, unintended occupational collective dose resulting from deficiencies in "as low as is reasonably achievable" (ALARA) planning and work control while performing the removal of steam condensing mode piping and components associated with the Unit 2 residual heat removal (RHR) system. Specifically, NMPNS failed to properly plan and coordinate outage work, and failed to perform welding activities correctly. This resulted in expansion of the collective exposure for this work from 8.557 person-rem to 17.968 person-rem. NMPNS entered this issue into their corrective action program (CAP) as condition report (CR) 2010-8443.

The finding was more than minor because it was associated with the program and process attribute of the Occupational Radiation Safety cornerstone and affected the cornerstone objective to ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. Additionally, the finding was similar to example 6.i in Appendix E of Inspection Manual Chapter (IMC) 0612, in that it resulted in collective exposure of greater than 5 person-rem and exceeded the outage goal by greater than 50 percent. The finding was evaluated in accordance with IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," and was determined to be of very low safety significance because NMPNS's current three year rolling average collective dose is 144.781 person-rem, less than 240 person-rem per unit. The finding had a cross-cutting aspect in the area of human performance, work control, in that the outage plan did not adequately incorporate actions to address the impact of work on different job activities.

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

**Significance:**  Sep 30, 2010

Identified By: Self-Revealing

Item Type: FIN Finding

### **Failure to Maintain Radiation Exposure ALARA During Refueling Floor Activities**

A self-revealing finding of very low safety significance was identified due to Nine Mile Point Nuclear Station (NMPNS) having unplanned, unintended occupational collective

dose resulting from deficiencies in "as low as is reasonably achievable" (ALARA) planning and work control while performing refueling floor activities at Unit 2. Specifically, the failure to have cleaned up a crud burst that had occurred late in the previous refueling outage, the decision to flood up the refueling cavity while refueling water activity remained four times higher than planned, incorrect calculations during reactor vessel (RV) head stud tensioning that resulted in having to remove the RV head insulation package and re-tension the RV head, and the inability to control work crew size on the refueling floor, resulted in expansion of the collective exposure for this work from 19.810 person-rem to 38.222 person-rem. NMPNS entered this issue into their corrective action program (CAP) as condition report (CR) 2010-8444.

The finding was more than minor because it was associated with the program and process attribute of the Occupational Radiation Safety cornerstone and affected the cornerstone objective to ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. Additionally, the finding was similar to example 6.i in Appendix E of Inspection Manual Chapter (IMC) 0612, in that it resulted in collective exposure of greater than 5 person-rem and exceeded the outage goal by greater than 50 percent. The finding was evaluated in accordance with IMC 0609, Appendix C, "Occupational Radiation Safety Significance Determination Process," and was determined to be of very low safety significance because NMPNS's current three year rolling average collective dose is 144.781 person-rem, less than 240 person-rem per unit. The finding had a cross-cutting aspect in the area of human performance, work control, in that the job site conditions which impacted human performance were not adequately incorporated into the outage plan.  
Inspection Report# : [2010004](#) (*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

Last modified : October 14, 2011