

# La Salle 2

## 1Q/2012 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:**  Sep 30, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Non-Conservative Voltage Input for Motor Starting Calculations**

The inspectors identified a finding of very low safety significance (Green) and associated NCV of Title 10 Code of Federal Regulations (CFR) Part 50, Appendix B, Criterion III, "Design Control," involving the licensee's failure to perform adequate analysis to demonstrate that safety related motors would start during a design basis event. The licensee entered this issue into the corrective action program (CAP) as Action Report (AR) 01139601 and conducted preliminary analysis to verify operability.

The licensee's failure to perform adequate analysis to demonstrate that motors would start during block loading was determined to be more than minor because there was reasonable doubt as to whether motors which are required to start at the onset of an accident would have adequate voltage to start, pending reanalysis. The inspectors determined that this was a design deficiency that did not result in loss of operability or functionality; and therefore, the finding was of very low safety significance (Green). This finding was determined not to have a cross cutting aspect. (1R21.1) Inspection Report# : [2011004](#) (*pdf*)

**Significance:**  Jul 29, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Implement a Corrective Action to Prevent Recurrence to Address a Significant Condition Adverse to Quality**

A finding of very low safety significance and associated NCV of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," was identified by the inspectors for the licensee's failure to develop and implement adequate corrective action to prevent recurrence in response to a significant condition adverse to quality associated with work activities on the 1D RHR service water pump. The licensee entered this issue into their corrective action program as IR 1241118.

The finding was considered more than minor because it impacted the Reactor Safety Mitigating Systems Cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences and affected the cornerstone attribute of Equipment Performance. Specifically, the inadequate corrective action allowed for recurrence of this issue during similar work on other safety-related components. A cross-cutting aspect associated with Problem Identification and Resolution was also assigned to this finding. [P.1(d)] (Section 40A2.1(3))

Inspection Report# : [2011008](#) (*pdf*)

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### Barrier Integrity

**Significance:**  Mar 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Implement Proceduralized Corrective Actions**

A finding of very low safety significance and associated NCV of Title 10 of the Code of Federal Regulations (CFR) Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the licensee's failure to implement appropriate proceduralized compensatory measures associated with LaSalle Operability Evaluation (OpEval) 11 002, "Drywell Temp Used as Input for the Containment Analysis." Specifically, non conservative temperature limits were established for the control room shiftly surveillance procedure and written instructions were not included for drywell penetration local leak rate test parameters to ensure the adequate performance of the tests. Upon notification by the inspectors, the licensee promptly entered the issues into the corrective action program (CAP) for evaluation and revised the surveillance procedure and test instructions. The finding was determined to be more than minor because it was associated with the Barrier Integrity Cornerstone attribute of procedure quality and affected the cornerstone objective of providing reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Additionally, if left uncorrected, the finding had the potential to lead to a more significant safety concern. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a, for the Containment Barrier, dated January 10, 2008. The finding was determined to be of very low safety significance because all questions in the Containment Barrier column were answered "No." This finding has a cross cutting aspect in the area of problem identification and resolution (PI&R) CAP, because the licensee did not take appropriate corrective actions to address safety issues in a timely manner, commensurate with their safety significance and complexity. Specifically, failing to appropriately execute corrective actions that were established in an OpEval resulted in the failure to establish appropriate instructions and procedures (P.1(d)).

Inspection Report# : [2012002](#) (pdf)

**Significance: SL-IV** Dec 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Perform an Adequate 10 CFR 50.59 Screening for the Use of Racklife Spent Fuel Pool Monitoring Computer Model**

A finding of very low safety significance and associated SL-IV NCV of 10 CFR 50.59(c)(2) was identified by the inspectors for the licensee's failure to perform an adequate 10 CFR 50.59 screening when evaluating if the implementation of Racklife to monitor Unit 2 spent fuel pool (SFP) rack degradation was a departure from a method of evaluation described in the Updated Final Safety Analysis Report. Specifically, when evaluating in 2005, if the proposed activity involved the use of an alternative evaluation methodology that is used in establishing the design bases or used in the safety analyses, the licensee dismissed the screening question as not applicable to the circumstances. As a result, the inspectors could not reasonably determine that the changes would not have ultimately required prior NRC approval. The licensee entered this issue into its CAP as AR 1294090. Since the licensee recently completed the installation of neutron absorbing inserts in the entire Unit 2 SFP, as referenced in License Amendment No.186, the use of Racklife to monitor its degradation will no longer be necessary.

The inspectors determined that the performance deficiency is greater than minor because it was associated with the Barrier Integrity Cornerstone attribute of configuration control (reactivity control) and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The inspectors performed a Phase 1 SDP review of this finding using the guidance provided in IMC 0609, and the finding screened as Green because all the questions in the Barrier Integrity Cornerstone column of IMC 0609's Table 4a were answered "no." Because violations of 10 CFR 50.59 can affect the NRC's ability to perform its regulatory function, they are dispositioned using the traditional enforcement process. The inspectors used the NRC's Enforcement Policy to determine that the violation was a SL-IV violation because the resulting changes were evaluated by the SDP as having very low safety significance. The inspectors did not identify a cross cutting aspect associated with the underlying finding because the finding was not representative of current performance.

Inspection Report# : [2011005](#) (pdf)

**Significance:**  Dec 31, 2011

Identified By: NRC

Item Type: FIN Finding

## **Failure to Perform an Adequate 10 CFR 50.59 Screening for the Use of Racklife Spent Fuel Pool Monitoring Computer Model**

A finding of very low safety significance and associated SL IV NCV of 10 CFR 50.59(c)(2) was identified by the inspectors for the licensee's failure to perform an adequate 10 CFR 50.59 screening when evaluating if the implementation of Racklife to monitor Unit 2 spent fuel pool (SFP) rack degradation was a departure from a method of evaluation described in the Updated Final Safety Analysis Report (UFSAR). Specifically, when evaluating in 2005, if the proposed activity involved the use of an alternative evaluation methodology that is used in establishing the design bases or used in the safety analyses, the licensee dismissed the screening question as not applicable to the circumstances. As a result, the inspectors could not reasonably determine that the changes would not have ultimately required prior NRC approval. The licensee entered this issue into its CAP as AR 1294090. Since the licensee recently completed the installation of neutron absorbing inserts in the entire Unit 2 SFP, as referenced in License Amendment No.186, the use of Racklife to monitor its degradation will no longer be necessary.

The inspectors determined that the performance deficiency is greater than minor because it was associated with the Barrier Integrity Cornerstone attribute of configuration control (reactivity control) and adversely affected the cornerstone objective to provide reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The inspectors performed a Phase 1 SDP review of this finding using the guidance provided in IMC 0609, and the finding screened as Green because all the questions in the Barrier Integrity Cornerstone column of IMC 0609's Table 4a were answered "no." Because violations of 10 CFR 50.59 can affect the NRC's ability to perform its regulatory function, they are dispositioned using the traditional enforcement process. The inspectors used the NRC's Enforcement Policy to determine that the violation was a SL IV violation because the resulting changes were evaluated by the SDP as having very low safety significance. The inspectors did not identify a cross cutting aspect associated with the underlying finding because the finding was not representative of current performance.

Inspection Report# : [2011005](#) (*pdf*)

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## **Emergency Preparedness**

**Significance:** SL-IV Jun 22, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

### **Changes to EAL Basis Decreased the Effectiveness of the Plan without Prior NRC Approval.**

The inspector identified a violation of very low safety significance involving a Severity Level IV NCV of 10 CFR 50.54(q) for failing to obtain prior approval for an emergency plan change which decreased the effectiveness of the plan. Specifically, the licensee modified the Emergency Action Level (EAL) Basis in EAL HU6, Revision 22, which indefinitely extended the start of the 15 minute emergency classification clock beyond a credible notification that a fire is occurring or indication of a valid fire detection system alarm. This change decreased the effectiveness of the emergency plan by reducing the capability to perform a risk significant planning function in a timely manner.

The violation affected the NRC's ability to perform its regulatory function because it involved implementing a change that decreased the effectiveness of the emergency plan without NRC approval. Therefore, this issue was evaluated using Traditional Enforcement. The NRC determined that a Severity Level IV violation was appropriate due to the reduction of the capability to perform a risk significant planning standard function in a timely manner. The licensee entered this issue into its corrective action program and revised the EAL basis to restore compliance. (1EP4)

The associated performance deficiency is tracked as item 2011-503-02.

Inspection Report# : [2010503](#) (*pdf*)

**Significance:**  Jun 22, 2011

Identified By: NRC

Item Type: FIN Finding

### **Changes to EAL Basis Decreased the Effectiveness of the Plan without Prior NRC Approval.**

The inspector identified a finding of very low safety significance involving a Severity Level IV NCV of 10 CFR 50.54

(q) for failing to obtain prior approval for an emergency plan change which decreased the effectiveness of the plan. Specifically, the licensee modified the Emergency Action Level (EAL) Basis in EAL HU6, Revision 22, which indefinitely extended the start of the 15 minute emergency classification clock beyond a credible notification that a fire is occurring or indication of a valid fire detection system alarm. This change decreased the effectiveness of the emergency plan by reducing the capability to perform a risk significant planning function in a timely manner.

The finding was more than minor using IMC 0612, because it is associated with the emergency preparedness cornerstone attribute of procedure quality for EAL and emergency plan changes, and it adversely affected the cornerstone objective of ensuring that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. Therefore, the performance deficiency was a finding. Using IMC 0609, Appendix B, the inspector determined that the finding had a very low safety significance because the finding is a failure to comply with 10 CFR 50.54(q) involving the risk significant planning standard 50.47(b)(4), which, in this case, met the example of a Green finding because it involved one Unusual Event classification (EAL HU6).

Due to the age of this issue, it was not determined to be reflective of current licensee performance and therefore a cross-cutting aspect was not assigned to this finding. (Section 1EP4)

The associated traditional enforcement item is tracked as item 2011-503-01.  
Inspection Report# : [2010503](#) (*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

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