

# Saint Lucie 1

## 1Q/2012 Plant Inspection Findings

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### Initiating Events

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### Mitigating Systems

**Significance:**  Dec 31, 2011

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Failure to Follow Operability Determination Procedure for Evaluation of Past Operability**

The inspectors identified a NCV of Technical Specification (TS) 6.8.1 and Regulatory Guide (RG) 1.33 for the licensee failing to implement a written procedure for operability determinations. Safety related procedure EN-AA-203-1001, "Operability Determinations and Functionality Assessments," was not fully implemented as written on multiple occasions when the 1A and 2A auxiliary feed water pump discharge pressure gauges used for periodic in-service surveillance testing were found out of calibration during periodic maintenance. Specifically, during the performance of maintenance procedure 1400064P, "Installed Plant Instrumentation Calibration," pressure gauge PI-09-7A was found out of calibration, required adjustment, and a condition report written for evaluation in the licensee's corrective action program. The inspector determined a performance deficiency existed when on three separate occasions from 2009 thru 2011, the senior reactor operator concluded incorrectly that the out of calibration gauge conditions did not affect past operability and therefore no engineering evaluation was performed as required by procedure EN-AA-203-1001.

The finding was more than minor because if the performance deficiency is not corrected then it could lead to a more significant safety concern. Using the NRC Manual Chapter 0609, ASignificance Determination Process, @ Table 4A, "Characterization Worksheet," the finding does not represent an actual loss of safety function or screen as potentially risk significant due to seismic, flooding, or severe weather. A contributing cause of the finding is related to the cross-cutting area of Problem Identification and Resolution, with a corrective action program aspect. Specifically, the operator failed to thoroughly evaluate the condition for past operability of the affected auxiliary feed water pump.

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

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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 : May 29, 2012