

# D.C. Cook 2

## 2Q/2012 Plant Inspection Findings

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### Initiating Events

**Significance:**  Jun 30, 2012

Identified By: Self-Revealing

Item Type: FIN Finding

#### **Failure to Implement Volts per Hertz Differential Relay Modification per Design**

One self-revealed finding of very low safety significance was identified for the failure to implement the Unit 2 main generator volts per hertz differential relay modification per design, as required by Engineering Change (EC) 50316, "Unit 2 Replacement of the Volts/Hertz Relay and the Overall Differential Relays with a Multifunctional Relay Unit." Consequently, while ascending in power, the relay actuated causing a main generator trip, resultant turbine trip and subsequent reactor trip on April 30, 2012. For corrective actions, the licensee programmed the correct preset settings into the volts per hertz differential relay prior to restarting Unit 2 and plans to add additional procedural requirements to ensure modification requirements are properly incorporated into the associated work orders. This issue was entered into the licensee's corrective action program (CAP) as Action Request (AR) 2012 5744.

The inspectors concluded the finding was more than minor because it is associated with the Initiating Events Cornerstone attribute of Procedure Quality. In addition, it adversely affected the Cornerstone objective to limit the likelihood of events that upset plant stability. Specifically, the failure to implement the SEL 487E relay modification per design, contributed to a main generator trip and resultant automatic reactor trip. The inspectors used IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 Initial Screening and Characterization of Findings," Table 4a for the Initiating Events Cornerstone to determine the significance. This finding was of very low safety significance because the finding did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment will not be available. This finding is associated with a cross cutting aspect in the resources component of the human performance cross cutting area. Specifically, the work order associated with installing the volts per hertz overall differential relay did not include sufficient guidance to ensure the SEL 487E relay modification was installed as designed

Inspection Report# : [2012003](#) (*pdf*)

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### Mitigating Systems

**Significance:**  Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

#### **Vortexing was not evaluated for the volume control, containment spray additive, refueling water storage tanks.**

The inspectors identified a finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the failure to evaluate vortexing in the volume control, containment spray additive, and refueling water storage tanks. Consequently, the minimum allowable submergence for the suction piping of these tanks did not consider the potential for air entrainment due to vortices. This finding was entered into the licensee's corrective action program to evaluate the potential for vortexing at these tanks and revise the affected calculations.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating System 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. In addition, the finding was associated with the Containment Barrier cornerstone attribute of structure, system, component, and barrier performance and affected the cornerstone objective of providing reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. The finding screened as of very low safety significance (Green) because: (1) the finding examples associated with the volume control and refueling water storage tanks were deficiencies confirmed not to result in loss of operability in that the licensee performed an evaluation that reasonably concluded the current limit setpoints prevent vortexing in these tanks; and (2) the finding example associated with the containment spray (CTA) additive tank was a design deficiency of the physical integrity of the reactor containment that did not affect the barrier function of the control room against smoke or a toxic atmosphere, represent an actual open pathway in the physical integrity of reactor containment, or involve an actual reduction in function of hydrogen igniters in the reactor containment. This finding did not have an associated cross-cutting aspect because it was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2012008](#) (pdf)

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**Significance:** Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Incomplete methodology for developing acceptance criteria for suction voids**

The inspectors identified a finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure to correctly incorporate the interim methodology for developing acceptance criteria for suction voids in Emergency Core Cooling Systems, Decay Heat Removal, and Containment Spray Systems pumps into procedures. Specifically, the licensee did not translate the limitations of the acceptance criteria with respect to rated performance of pump operation. This finding was entered into the licensee's corrective action program to revise the affected procedure.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating System 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 screened as of very low safety significance (Green) because it was a design deficiency confirmed not to result in loss of operability. Specifically, a review of recent monitoring results determined that identified voids did not exceed the applicable acceptance criteria. The inspectors did not find an applicable cross-cutting aspect which represented the underlying cause of this performance deficiency; therefore, no cross-cutting aspect was assigned.

Inspection Report# : [2012008](#) (pdf)

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**Significance:** Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Procedures were not developed for performance monitoring of plant parameters.**

The inspectors identified a finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure to establish minimum flowrate and time required in procedures used to perform dynamic flushing activities affecting Emergency Core Cooling Systems, Decay Heat Removal, and Containment Spray Systems pumps. This finding was entered into the licensee's corrective action program to revise the affected procedures.

The performance deficiency 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, the failure to establish an appropriate procedure for flushing would have the potential of not removing voids to ensure system operability. The finding screened as of very low safety significance (Green) because it was a design deficiency confirmed not to result in loss of operability. Specifically, a historical review of previous dynamic flushing activities determined that sufficient flowrates and time values were achieved at the appropriate sequences. The inspectors did not identify a cross-cutting aspect associated with this finding because the finding was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2012008 \(pdf\)](#)

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**Significance:** Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Minimum flowrates and time requirements for dynamic flushing were not established**

The inspectors identified a finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure to include adequate venting instructions in the procedure use to respond to a MODE 4 loss-of-coolant accident. Specifically, the procedure did not include instructions to address all of the affected residual heat removal system high points, including the discharge piping. The finding was entered into the licensee's corrective action program to leave one train of the system idle while the other train cools down the reactor coolant system below 200°F to ensure that the discharge side of one train of residual heat removal system is not vulnerable to steam formation.

The performance deficiency 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 finding screened as of very low safety significance (Green) using a Phase II evaluation. The inspectors determined that this finding had a cross-cutting aspect in the area of problem identification and resolution because the licensee did not thoroughly evaluate relevant external operating experience. Specifically, the licensee's evaluation of Information Notice 2010-11 incorrectly concluded that procedures contained sufficient direction to preclude flashing.

Inspection Report# : [2012008 \(pdf\)](#)

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**Significance:** Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate Procedure for Responding to a MODE 4 LOCA**

The inspectors identified a finding of very low safety significance and associated Severity Level IV violation of 10 CFR 50.59, "Changes, Tests, and Experiments," for the failure to perform a written evaluation, which provided the bases for the determination that a change did not require a license amendment. Specifically, the licensee failed to provide a basis for not applying for a license amendment associated with a modification of the residual heat removal pump casing drain lines. The finding was entered into the licensee's corrective action program to: (1) stage a hose and pipe couplings to support venting at the residual heat removal pump casing vent; (2) create a work order request to flush flow through the abandoned drain lines that were cut from the pump casing vent to show the lines could still pass water; (3) develop an alternate means to accomplish this activity; and (4) evaluate the change.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating System cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the capability and availability of systems that respond to initiating events to prevent undesirable consequences. Violations of 10 CFR 50.59 are dispositioned using the traditional enforcement process instead of the significance determination process because they are considered to be violations that potentially impede or impact the regulatory process. The finding screened as of very low safety significance (Green) using a Phase II evaluation. The inspectors did not identify a cross-cutting aspect associated with this finding because the finding was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2012008 \(pdf\)](#)

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**Significance:** Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**10 CFR 50.59 evaluation for modification of RHR pump casing drain lines was not performed**

The inspectors identified a finding of very low safety significance and associated Severity Level IV violation of 10 CFR 50.59, "Changes, Tests, and Experiments," for the failure to perform a written evaluation, which provided the bases for the determination that a change did not require a license amendment. Specifically, the licensee failed to

provide a basis for not applying for a license amendment associated with a modification of the residual heat removal pump casing drain lines. The finding was entered into the licensee's corrective action program to: (1) stage a hose and pipe couplings to support venting at the residual heat removal pump casing vent; (2) create a work order request to flush flow through the abandoned drain lines that were cut from the pump casing vent to show the lines could still pass water; (3) develop an alternate means to accomplish this activity; and (4) evaluate the change.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating System cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the capability and availability of systems that respond to initiating events to prevent undesirable consequences. Violations of 10 CFR 50.59 are dispositioned using the traditional enforcement process instead of the significance determination process because they are considered to be violations that potentially impede or impact the regulatory process. The finding screened as of very low safety significance (Green) using a Phase II evaluation. The inspectors did not identify a cross-cutting aspect associated with this finding because the finding was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2012008](#) (pdf)

**Significance:**  Jun 01, 2012

Identified By: NRC

Item Type: FIN Finding

**10 CFR 50.59 evaluation for modification of RHR pump casing drain lines was not performed**

The inspectors identified a finding of very low safety significance and associated Severity Level IV violation of 10 CFR 50.59, "Changes, Tests, and Experiments," for the failure to perform a written evaluation, which provided the bases for the determination that a change did not require a license amendment. Specifically, the licensee failed to provide a basis for not applying for a license amendment associated with a modification of the residual heat removal pump casing drain lines. The finding was entered into the licensee's corrective action program to: (1) stage a hose and pipe couplings to support venting at the residual heat removal pump casing vent; (2) create a work order request to flush flow through the abandoned drain lines that were cut from the pump casing vent to show the lines could still pass water; (3) develop an alternate means to accomplish this activity; and (4) evaluate the change.

The performance deficiency was determined to be more than minor because it was associated with the Mitigating System cornerstone attribute of equipment performance and affected the cornerstone objective of ensuring the capability and availability of systems that respond to initiating events to prevent undesirable consequences. Violations of 10 CFR 50.59 are dispositioned using the traditional enforcement process instead of the significance determination process because they are considered to be violations that potentially impede or impact the regulatory process. The finding screened as of very low safety significance (Green) using a Phase II evaluation. The inspectors did not identify a cross-cutting aspect associated with this finding because the finding was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2012008](#) (pdf)

**Significance:**  Jun 01, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Inadequate Procedure for RCS Vacuum Fill During Reduced Inventory Operations**

The inspectors identified a finding of very low safety significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for failure to establish procedures for reduced inventory operations that were appropriate to preclude air entrainment into Residual Heat Removal (RHR) and Reactor Coolant Systems (RCS). Specifically, a procedure allowed operation of RHR while in reduced inventory operations with a minimum RCS level and maximum pump flowrate combination that was determined to result in air-entrainment vortices. The finding was entered into the licensee's corrective action program to place an administrative hold to the procedure until proper documentation is revised and updated and to revise the procedure to require stricter use of high accuracy level instrumentation.

The performance deficiency was determined to be more than minor because it was associated with the initiating event cornerstone attribute of procedure quality and affected the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown operations. The finding screened as of very low safety significance (Green) using a Phase II evaluation. The inspectors did not identify a cross-cutting aspect associated with this finding because the finding was not confirmed to reflect current performance due to the age of the performance deficiency.

Inspection Report# : [2012008](#) (*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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## **Security**

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

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## **Miscellaneous**

Last modified : September 12, 2012