

Millstone 3

2Q/2012 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance:  Jun 30, 2012

Identified By: NRC

Item Type: FIN Finding

FIN 05000423/2012003-01, Inadequate Operability Determination for 3FWS*CTV41 Feedwater Isolation Valve Hydraulic Actuators.

Green. An NRC identified finding (FIN) of very low safety significance (Green) was identified for Dominion's failure to adequately assess the operability of the Unit 3 Feedwater isolation valves, 3FWS*CTV41A, B, C and D in accordance with OP-AA-102-1001, "Development of Technical Guidance Basis to Support Operability Determinations," and C OP 200.18, "Time Critical Operator Action Validation and Verification." Specifically, Dominion did not properly validate or credit manual operator actions to isolate the main feedwater lines during a feedline break inside containment as a compensatory measure for degraded hydraulic valve actuators. Dominion entered this issue into their corrective action program (CAP), and conducted a reanalysis of the operability determination.

The finding is more than minor because it is similar to NRC Inspection Manual Chapter (IMC) 0612, Appendix E, "Examples of Minor Issues," Example 3.k; in that the inadequate assessment of operability resulted in a condition where there was a reasonable doubt on the operability of the FWI function and the feedwater isolation valves. This issue is associated with the Equipment Control 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. Specifically, Dominion did not explicitly take credit for manual operator actions to trip the main feedwater pumps as a compensatory measure for the degraded capability of the 3FWS*CTV41 feedwater isolation valves to perform their safety function during a feedline break event inside containment. The inspectors conducted a phase 1 screening in accordance with IMC 0609.04, "Phase 1 – Initial Screening and Characterization of Findings," and determined the finding was of very low safety significance.

The inspectors did not assign a cross cutting aspect to this finding because the finding was not reflective of current performance. Operability determination OD000237 was completed in 2009 and OP-AA-102-1001 does not require periodic reassessment of active operability determinations.

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

Significance:  Sep 22, 2010

Identified By: Self-Revealing

Item Type: VIO Violation

Failure to develop a mitigation strategy for depressurization of the Unit 3 steam generators and use a portable pump for injection make-up.

This finding, affecting the Mitigating Systems Cornerstone, is related to developing a strategy to maintain core cooling and mitigate fuel damage, under the circumstances associated with loss of large areas of the plant due to explosions or fire; in response to Section B.5.b. of the February 25, 2002, Interim Compensatory Measures (ICM) Order (EA-02-026) and related NRC guidance. This finding has been designated as "Official Use Only - Security-Related Information;" therefore, the details of this finding are being withheld from public disclosure. This finding has

a cross-cutting aspect in the area of Problem Identification and Resolution (Corrective Action Program). [P.1(c)]. See inspection report for more details.

Inspection Report# : [2010011](#) (*pdf*)

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

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.

Miscellaneous

Last modified : September 12, 2012