

## Robinson 2

# 1Q/2013 Plant Inspection Findings

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### Initiating Events

**Significance:**  Jun 30, 2012

Identified By: Self-Revealing

Item Type: FIN Finding

#### **Lack of preventive maintenance on feedwater control switch results in an automatic reactor trip**

A self-revealing Green finding was identified when the licensee failed to establish adequate preventative maintenance for equipment associated with the feedwater control systems. Specifically, the licensee's inappropriate classification of the feedwater flow loop selector switch as a "run-to-failure" component permitted the switch to remain in service, without preventative maintenance, until its failure on March 28, 2012, which resulted in a feedwater transient and reactor trip. Corrective actions included the replacement of the failed switch and future replacement of seven additional switches that were deemed to be at risk for a similar failure. This issue has been entered into the corrective action program (CAP) as Nuclear Condition Report (NCR) #527203.

The licensee's inappropriate classification of plant equipment in accordance with ADM-NGGC-0107 Rev. 1, Equipment Reliability Process Guideline, which permitted feed flow selector switch 1/FM-488B to remain in service, without preventative maintenance, until failure was a performance deficiency. This finding was determined not to be a violation of NRC requirements. The finding was more than minor because it was associated with the initiating events cornerstone attribute of Equipment Performance, and it affected the associated cornerstone objective to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, the performance deficiency caused an automatic reactor trip from 55 percent power operations on March 28, 2012. The finding was determined to be of very low safety significance (Green) because the finding did not contribute to both the likelihood of a reactor trip and the likelihood that mitigating equipment or functions would not be available. The performance deficiency had a cross-cutting aspect of Evaluation of Identified Problems in the area of Problem Identification and Resolution, because the licensee failed to thoroughly evaluate the events in 2010 and 2008 such that the resolutions addressed the causes and extent of conditions as necessary. (P.1(c)) (Section 1R12)

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

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### Mitigating Systems

**Significance:**  Dec 31, 2012

Identified By: NRC

Item Type: FIN Finding

#### **Failure to Effectively Implement Gas Intrusion Program (GL 2008-01)**

Green. The inspectors identified a Finding for the licensee's failure to perform the 18-month pre-refueling outage (RO) ultrasonic testing (UT) examinations on 47 potential gas accumulation locations required by plant operating manual PLP-085, "Emergency Core Cooling Systems Gas Management Program (GL 2008-01)." Compliance with PLP-085 ensures the capability of the safety injection (SI), residual heat removal (RHR), and containment spray (CS)

systems to perform their safety-related functions, and effectively implements the licensee's gas management program as committed to the NRC in response to Generic Letter 2008-01. The licensee entered the issue into the corrective action program (CAP) as nuclear condition report (NCR) 575063, and is evaluating corrective actions.

The failure to perform pre-RO UT examinations on 47 potential gas accumulation locations, as required by PLP-085 was a performance deficiency. The performance deficiency was more than minor because if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, if the licensee continued to miss pre-RO UT examinations, conditions that result in the formation of voids in the SI, RHR, and CS systems could go undetected with the potential to adversely affect the systems' capability to perform their functions. The inspectors assessed the finding using IMC 0609 Attachment 4, "Initial Characterization of Findings," and IMC 0609 Appendix A, "The Significance Determination Process for Findings At-Power," and determined the finding was of very low safety significance (Green) because it was not a design deficiency, it did not represent the loss of a system safety function, did not result in exceeding a Technical Specification allowed outage time, and did not screen as potentially risk-significant due to a seismic, flooding, or severe weather initiating event. The inspectors identified a cross-cutting aspect in the work practices component of the human performance area, because the licensee did not define and effectively communicate expectations regarding procedural compliance and personnel following procedures. Specifically, on two occasions, the licensee did not perform pre-RO UTs in accordance with their gas management program, as described in PLP-085. [H.4(b)] (Section 40A5.5)

Inspection Report# : [2012005](#) (pdf)

**Significance:** G Nov 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Maintain Fire Load Limits in Fire Area A**

Green. The inspectors identified a Green Non-Cited Violation (NCV) of Robinson's License Condition 3. E, "Fire Protection Program", for increasing the amounts of in-situ combustibles in several fire zones within fire area "A" above required limits in NRC approved licensing exemptions. The licensee has entered the finding into the corrective action program as Nuclear Condition Report (NCR) 567284 and established continuous fire watches as well as restricted transient combustibles permits for the fire areas of concern.

The failure to properly evaluate increases in the quantities of in-situ combustibles above those stated as upper limits for anticipated fire severity and duration in HBR2 exemption requests and an associated SER was a performance deficiency. This performance deficiency was determined to be more than minor because the finding was associated with the protection against external events (i.e. fire) attribute of the mitigating systems cornerstone objective of ensuring the availability, reliability and capability of systems that respond to external events that prevent undesirable consequences. In seven fire zones upper limits for fire severity were exceeded. Using the guidance contained in the IMC 0609 Appendix F, the inspectors concluded that a Phase 3 analysis was necessary because the noncompliance involved fires leading to main control room abandonment. The Phase 3 analysis concluded that this item would be associated with a finding of very low safety significance (Green) because the fire detection systems, fire brigade, fire barriers, and the Dedicated Shutdown Systems were not affected by increase in fire loading in the affected fire areas. The inspectors identified a cross cutting aspect in the decision making component of the human performance area because the licensee did not use conservative assumptions in decision making to demonstrate the proposed action did not affect the validity of the technical basis for granted exemptions. [H.1(b)]

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

**Significance:**  Nov 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Identify and Correct Deficiencies in the Emergency Lighting System Preventive Maintenance Program**

Green. The inspectors identified a Green NCV of 10 CFR Part 50.65, Maintenance Rule, for the licensee's failure to identify and correct deficiencies in the emergency lighting system (ELS) preventive maintenance program. The licensee entered the issues into their corrective action program as NCRs 567517 and 567632. The deficiency will be mitigated by the operator's use of flashlights until the deficiencies are corrected.

The licensee's failure to identify and correct deficiencies in the ELS preventive maintenance program was a performance deficiency. The performance deficiency was more than minor because it was associated with the protection against external events (fire) attribute of the Mitigating Systems Cornerstone and it adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the high failure rate of battery load test resulted in a lack of reasonable assurance that the ELS would perform its design function of providing illumination for 8 hours during fire events. Utilizing IMC 0609, Appendix F, "Fire Protection Significance Determination Process," the team assigned the performance deficiency to the Post-fire Safe Shutdown category since it affected systems or functions relied upon for post-fire safe shutdown. The finding was then assigned a low degradation rating since the finding minimally impacted the performance and reliability of the fire protection program element. Specifically, the team noted that operators were required to obtain and carry flashlights. Therefore, the finding screened as having very low safety significance (Green). The team identified a cross-cutting aspect in the corrective action program component of the problem identification and resolution area. [P.1(b)]

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

**Significance:**  Sep 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to Include the Fuel Oil Supply to the TSC/EOF/Security Diesel in the Maintenance Rule**

The inspectors identified a Green non-cited violation (NCV) of 10 CFR 50.65(b)(2), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," because the licensee failed to include all aspects of the Fuel Oil System in the maintenance rule program. Specifically, the fuel oil supply to the Technical Support Center (TSC) Emergency Operations Facility (EOF) Security Diesel is required to support the diesels emergency operating procedure (EOP) function of providing back-up power to security lighting and the plant computer system. The licensee entered the issue into their corrective action program (CAP) as Nuclear Condition Report (NCR) 560424. The licensee corrective actions included revising the scoping document of the fuel oil system to include its function of providing fuel to the diesel.

The failure to scope in the fuel oil system function of providing fuel to the TSC/EOF/Security Diesel to the maintenance rule program was a performance deficiency. The finding was more than minor because it impacted the equipment performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to scope in the fuel oil supply to the maintenance rule could affect

the TSC/EOF/Security reliability and the accomplishment of EOPs. This finding was considered to have very low safety significance (Green) because the finding did not cause a loss of mitigation equipment functions and did not represent an actual loss of function of one or more non-Technical Specification Trains of equipment designated as high safety-significant in accordance with the licensee's maintenance rule program for more than 24 hours. This finding had a cross cutting aspect in the Corrective Action Program component of the Problem Identification and Resolution area, because the licensee failed to perform a thorough evaluation, such that the necessary support systems for the TSC/EOF/Security diesel were identified and added to the maintenance rule program (P.1(c)).

Inspection Report# : [2012004](#) (*pdf*)

**Significance:**  Jun 30, 2012

Identified By: NRC

Item Type: FIN Finding

**Inoperability of the refueling water storage tank not recognized as a safety system functional failure**

The inspectors identified a Green finding for the licensee's failure to identify and document Safety System Functional Failures (SSFF) in accordance with REG-NGGC-0009, NRC Performance Indicators and Monthly Operating Report Data. The licensee did not recognize that rendering the refueling water storage tank inoperable by placing the non-seismically qualified purification system in operation as documented in LER 05000261/2011-001-00, "Condition Prohibited by Technical Specifications When Non-Seismic System was Aligned to Refueling Water Storage Tank due to Regulatory Requirements not Adequately Incorporated in Plant Documentation" also created a SSFF. The licensee entered the issue into the CAP as NCR 539132. Corrective actions are still being evaluated.

The inspectors determined that the licensee's failure to identify and document a SSFF was a performance deficiency. Specifically, Attachment 7 of REG-NGGC-009, NRC Performance Indicators and Monthly Operating Report Data, Rev. 11 requires documenting SSFF's. The finding was determined to be more than minor because the minor screening question of whether the performance deficiency would have caused the SSFF PI to exceed a threshold was determined to have occurred. Specifically, had the licensee recognized the SSFFs and documented them during the investigation of LER 05000261/2011-001-00, the SSFF PI would have crossed the green/white threshold in the 4th quarter of 2010. The finding screened as Green because no loss of operability or functionality resulted from the failure to recognize the SSFF and document the event as described in LER 05000261/2011-001-00. The inspectors determined this performance deficiency had a cross-cutting aspect in the Corrective Action Program component of the Problem Identification and Resolution Area, because the licensee did not thoroughly evaluate the condition described in LER 05000261/2011-001-00, to include conditions such as a SSFF. (P.1(c))(Section 40A1)

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

**Significance:**  Jun 30, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

**Inaccurate safety system functional failure performance indicator submittal**

The inspectors identified a Severity Level (SL) IV NCV of 10 CFR 50.9(a), "Completeness and Accuracy of Information," when the licensee inaccurately reported Safety System Functional Failure (SSFF) performance indicator data beginning with the 4th quarter of 2010. The licensee entered the issue into the CAP as NCR 539132. Corrective actions are still being evaluated.

The inspectors determined the licensee's failure to identify and document a SSFF was a performance deficiency. Specifically, Attachment 7 of REG-NGGC-009, NRC Performance Indicators and Monthly Operating Report Data, Rev. 11 requires documenting SSFF's for inclusion in the NRC performance indicator (PI) submittal. This resulted in a failure to submit complete and accurate PI data resulting from the investigation of LER 05000261/2011-001-00, "Condition Prohibited by Technical Specifications When Non-Seismic System was Aligned to Refueling Water

Storage Tank due to Regulatory Requirements”. Due to the inadequate review of LER 05000261/2011-001-00, the licensee submitted inaccurate data for the SSFF PI beginning in the 4th quarter of 2010. If accurate data had been provided the SSFF PI would have transitioned from green to white in the 4th quarter of 2010. The finding was more than minor because it impacted the ability of the NRC to perform its regulatory oversight function. The finding was determined to be a SL IV violation using the examples in the Enforcement Policy, where a licensee submits inaccurate or incomplete PI data to the NRC that would have caused a PI to change from green to white. No cross-cutting aspect was assigned due to traditional enforcement violations are not screened for cross-cutting aspects. (Section 40A1)

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

**Significance:** G May 25, 2012

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

**Failure to Take Adequate Corrective Action to Preclude Repetition of a Significant Condition Adverse to Quality Associated with the Refueling Water Storage Tank Purification**

Green: A self-revealing Green NCV of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, was identified for the licensee’s failure to take adequate corrective actions to prevent recurrence (CAPR) in response to a significant condition adverse to quality (SCAQ) associated with the purification of the Refueling Water Storage Tank (RWST). Specifically, on March 16, 2012, with the plant in Mode 4, the licensee aligned the non-seismically qualified Spent Fuel Pool Demineralizer to the seismically qualified boundary of the RWST to perform purification of the RWST. This action rendered the RWST inoperable. This issue was previously identified as a significant condition adverse to quality in May 2011, but the corrective actions taken failed to preclude repetition. The licensee entered this issue in the corrective action program as Nuclear Condition Report (NCR) 524619. As immediate corrective actions, the licensee removed the SFP purification system from service and replaced the caution tags on valves SFPC-805A, Refueling Water Purification Pump Suction from RWST and SFPC-805B, RWST Return, with a Clearance. The licensee plans to revise several operating procedures to correctly apply Technical Specifications implications into procedural steps and they also plan to implement Engineering Change (EC) 80584, to perform a seismic qualification of the spent fuel pool / RWST purification system to allow alignment to the RWST without affecting operability.

The licensee’s failure to take adequate corrective actions to prevent recurrence of a SCAQ, aligning the non-seismically qualified spent fuel pool demineralizer system for purification of the safety related and seismically qualified RWST, was a performance deficiency. The finding was more than minor because if left uncorrected, it has the potential to lead to a more significant safety concern. The finding was determined to affect the mitigating systems cornerstone objective of ensuring the availability, reliability, and capability of systems to respond to initiating events to prevent undesirable consequences. Specifically, during a seismic event the purification piping could break and cause a loss of inventory in the RWST which is used in accident mitigation. Inspection Manual Chapter (IMC) 0609, Attachment 4, Table 4a, “Phase 1 – Initial Screening and Characterization of Findings,” determined that this finding was within the mitigating systems (MS) cornerstone and was potentially risk significant due to a seismic external event and therefore required a Phase 3 SDP analysis. A phase 3 risk assessment was performed by a regional Senior Risk Analyst (SRA) using the NRC SPAR model. The analysis determined that the risk increase of the performance deficiency was an increase in core damage frequency less than 1E-6/year a GREEN finding of very low safety significance. The cross cutting aspect of the finding was directly related to the CAP component of the Problem Identification and Resolution area, because the licensee failed to take appropriate corrective actions to address safety issues. Specifically, the licensee’s corrective actions regarding the alignment of the purification system to the RWST were not adequate to solve the issue and prevent recurrence (P.1(d)).

Inspection Report# : [2012007](#) (pdf)

**Significance:** **G** May 25, 2012

Identified By: NRC

Item Type: FIN Finding

### **Failure to Implement Trending Requirements Set Forth in Plant Procedures**

Green: An NRC identified finding was identified for the licensee's failure to implement trending requirements set forth in CAP-NGGC-0206, "Performance Assessment and Trending" and EGR-NGGC-0010, "System Component Trending Program and System Notebooks." Consequently the licensee missed opportunities to identify and enter adverse conditions into the CAP. The licensee entered these issues into the corrective action program as NCRs 535537 and 535926. The licensee has taken immediate corrective actions which include the generation of trend reports that were previously missed.

The finding was more than minor because the licensee's failure to correct trending program implementation deficiencies could have the potential to lead to a more significant safety concern. Specifically, these trending program implementation deficiencies leave the station vulnerable to not identifying less significant issues that may be providing precursor insights that could prevent a more significant condition adverse to quality. The finding was determined to affect the mitigating systems cornerstone objective of ensuring the availability, reliability, and capability of systems to respond to initiating events to prevent undesirable consequences. In accordance with NRC Inspection Manual Chapter 0609.04, Significant Determination Process – Phase 1 screening, the finding was determined to be of very low safety significance (Green) because the finding did not result in a loss of system safety function or a loss of safety function of a single train for greater than allowed Technical Specification allowed outage time. This finding has a cross-cutting aspect in the area of problem identification and resolution associated with the corrective action program component. Specifically, the licensee failed to periodically trend and assesses information from the CAP and other assessments in the aggregate to identify programmatic and common cause problems P.1(b) Inspection Report# : [2012007](#) (*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 : June 04, 2013