

Diablo Canyon 1 3Q/2013 Plant Inspection Findings

Initiating Events

Significance: G Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Implement the Fire Protection Program Requirements for the Control of Transient Combustible Material

Green. The inspectors identified a Green non-cited violation of the licensee's approved fire protection program as defined in Diablo Canyon Facility Operating License Conditions 2.C(5) for Unit 1 and 2.C(4) for Unit 2 involving the failure to effectively implement the fire protection program. Specifically, the inspectors identified multiple examples where the licensee failed to maintain control and tracking of combustible materials, welding equipment, and oxygen/acetylene rigs in the plant. The licensee entered the condition into the corrective action program as Notifications 50510062, 50511864, 50561959, and 50537650.

The failure to effectively implement all fire prevention controls and processes as required in the approved fire protection 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 Initiating Events Cornerstone and it adversely affected the cornerstone objective of limiting the likelihood of events that upset plant stability and challenge critical safety functions. Using Inspection Manual Chapter 0609, Appendix F, "Fire Protection Significance Determination Process," the inspectors concluded that the finding was of very low safety significance (Green) because each deficiency was rated as "Low" degradation because for the violations of the hot work permitting program, all normally required fire prevention measures remained in place and for the violations of the transient combustibles control program, the materials involved did not significantly increase the fire frequency. This finding had a cross-cutting aspect in the area of human performance associated with the work practices component, because the cause of the performance deficiency involved the licensee not ensuring supervisory and management oversight of work activities, such that nuclear safety was supported.

Inspection Report# : [2013003](#) (*pdf*)

Mitigating Systems

Significance: G Jul 11, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Evaluate the Effects on the Emergency Diesel Generator Load Capability for Maximum Combustion Air Temperature Conditions

The team identified a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," which states, in part, "measures shall be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures and instructions." Specifically, as of July 11, 2013, the licensee failed to evaluate the impact of the site combustion air temperature and the vendor specified diesel generator rating for combustion air temperature in the emergency diesel generator loading analysis. In addition, the licensee failed to evaluate the available combustion air temperature for the maximum site outside air conditions could

have affected the capability of safety-related equipment to respond to initiating events. This finding was entered into the corrective action program as Notifications DN-50573049 and DN-50570764

The failure to properly evaluate the vendor stated effects of combustion air temperature on the diesel generator capability and to determine and evaluate the expected maximum value for diesel generator combustion air temperature, based on site-specific conditions, was a performance deficiency. The finding was more than minor because it was associated with the design control attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, using actual data, the licensee found that derating of 1.5 percent was necessary under limiting air temperature conditions. Using Inspection Manual Chapter 0609, Significance Determination Process, Appendix A, the finding was determined to have very low safety significance (Green) because the finding was a design or qualification deficiency that did not result in the loss of operability or functionality, did not result in a loss of safety function, and did not screen as potentially risk significant due to external events. This finding had a problem identification and resolution cross-cutting aspect associated with thoroughly evaluating problems such that the resolution addresses cause and extent of condition.

Inspection Report# : [2013007](#) (*pdf*)

Significance:  Jul 11, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Evaluate the Auxiliary Feedwater Pump Motor Capability for the Effects of Pump Maximum Breakhorsepower Conditions

The team identified a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," which states, in part, "measures shall be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures and instructions." Specifically, as of July 11, 2013, the licensee failed to evaluate the effects of pump load on the auxiliary feedwater pump motor for the design basis maximum flow conditions that could occur during a postulated steam line break coincident with maximum diesel generator frequency which could have affected the capability of safety-related equipment to respond to initiating events. This finding was entered into the corrective action program as Notification DN-50572850.

The failure to evaluate the capability of auxiliary feedwater pump motors for the design basis accident maximum pump brake horsepower condition coincident with the maximum diesel generator frequency, which could result in a motor overload, was a performance deficiency. The finding was more than minor because it was associated with the design control attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, there was no analysis or test that demonstrated the motors would be capable of operating for the required mission time during a high energy line break, which resulted in maximum pump brake horsepower conditions that could occur coincident with maximum diesel engine frequency. Using Inspection Manual Chapter 0609, Significance Determination Process, Appendix A, the finding was determined to have very low safety significance (Green) because the finding was a design or qualification deficiency that did not result in the loss of operability or functionality, did not result in a loss of safety function, and did not screen as potentially risk significant due to external events. This finding did not have a cross-cutting aspect because the most significant contributor did not reflect current licensee performance.

Inspection Report# : [2013007](#) (*pdf*)

Significance:  Jul 11, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Procedures for Establishing Temporary Ventilation

The team identified a Green non-cited violation associated with Technical Specification 5.4.1(a), "Procedures," which requires that written procedures be established, implemented, and maintained covering the applicable procedures in Regulatory Guide 1.33, Revision 2, Appendix A. Regulatory Guide 1.33, "Quality Assurance Program," Appendix A, Section 5, requires procedures for Abnormal, Offnormal, or Alarm Conditions. Specifically, as of July 11, 2013, Procedure CP M-10, "Fire Protection of Safe Shutdown Equipment," Revision 27, Attachment 7.8, "Temporary Ventilation for the Control Room, Inverter/Charger Rooms, and 480V Vital Switchgear Rooms and Charging Pump 1-3 Room," Section 4a, requires the use of two 24-inch diameter fans, which, if connected as directed, would not perform the function as prescribed by the procedure as the fans require more current than can be supplied from either the equipment room receptacles or from the alternate power source (the temporary generator and distribution panel). This finding was entered into the corrective action program as Notifications DN-50570838 and DN-50572295.

The failure to provide an adequate procedure for establishing temporary ventilation was a performance deficiency. The finding was more than minor because it affected the equipment performance attribute associated with the Mitigating Systems Cornerstone as related to the availability, reliability, and capability of the 480V Vital Switchgear Rooms. The team reviewed this finding using Inspection Manual Chapter 0609 Attachment 0609.04; 0609 Appendix A, Exhibit 2; and Inspection Manual 0609 Appendix A, Exhibit 4, because it affected the External Event Mitigation Systems (Seismic/Fire/Flood/Severe Weather Protection Degraded) while the plant was at power and involved the loss or degradation of equipment specifically designed to mitigate an external initiating event such as a fire. Inspection Manual Chapter 0609 Appendix A, Exhibit 4, led to a Detailed Risk Evaluation because the finding would degrade two or more trains of a multi-train system or function and would degrade one or more trains of a system that supports a risk significant system or function. The bounding change to the core damage frequency was $4E-7$ /year (Green). The finding was not a significant contributor to the large early release frequency. The most dominant sequences included fires in Fire Area 34, failure of the 480 Vac switchgear cooling, and the failure of the manual action to restore cooling. The low frequency of applicable fires combined with the relatively low failure probability for the alternate cooling helped to reduce the risk. This finding had a human performance cross-cutting aspect associated with resources, because the licensee did not have adequate procedures and available facilities and equipment, including physical improvements, simulator fidelity and emergency facilities and equipment.

Inspection Report# : [2013007](#) (pdf)

Significance: G Dec 20, 2012

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Failure to Maintain Required Firewater System Configuration

The team reviewed a self-revealing non-cited violation of License Conditions 2.C(4) for Unit 1 and 2.C(5) for Unit 2, "Fire Protection Program," due to the licensee inadvertently isolating the firewater yard loop for approximately three days, reducing the plant's fire protection capability without compensatory actions. The licensee entered this issue in their corrective action program as Notification 50513006.

The failure to maintain the fire water system configuration as required in the approved fire protection 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. The performance deficiency affected the fire protection defense-in depth strategies involving post-fire safe shutdown systems. The major fire loading in the yard area resulted from the 12 large transformers. The senior reactor analyst made the bounding assumption that any transformer fire without suppression would result in an unrecoverable loss of offsite power. A bounding value was calculated by multiplying the fire ignition frequency by the conditional core damage probability. This resulted in a change to core damage frequency of 1.2×10^{-7} . Therefore, the subject finding was of very low safety significance (Green).

This performance deficiency had a cross-cutting aspect in the area of resources associated with providing complete,

accurate and up-to-date design documentation, procedures, and work packages, and correct labeling of components. Specifically, the licensee did not provide sufficient details in procedures for operators to successfully align an infrequently operated valve with no position indication. [H.2(c)]
Inspection Report# : [2012008](#) (*pdf*)

Significance:  Dec 20, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Compensatory Measures for Fire Protection Program Deficiencies

The team identified a non-cited violation of License Conditions 2.C(4) for Unit 1 and 2.C(5) for Unit 2, “Fire Protection Program,” due to the licensee’s failure to establish or adequately implement compensatory measures for non-compliances with the licensee’s approved fire protection program. These non-compliances were identified during the licensee’s ongoing transition to a new fire protection program in compliance with National Fire Protection Association Standard 805, “Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants,” (NFPA 805). The licensee entered this issue in their corrective action program as Notifications 50521360 and 50531363.

The failure to establish or maintain appropriate compensatory measures for identified deficiencies in the approved fire protection 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. A senior reactor analyst evaluated the significance of this performance deficiency.

A fire that results in the loss of switchgear room ventilation would cause a loss of all ac and dc power if operators did not take action to recover cooling. The analyst determined that the licensed operators would have at least two clear annunciators indicating that ventilation had been lost and that room temperatures were increasing. Additionally, Procedure CP-M10, “Fire Protection of Safe Shutdown Equipment”, was available to assist in providing portable fan cooling to the rooms.

For a fire to result in an intersystem loss of coolant accident, it would have to cause a 3 phase hot short on both of two shutdown cooling suction valves. Given that each valve is on a different electrical train, the analyst determined that the conditional probabilities of the hot shorts involved would best be modeled as independent. Accounting for the risk associated with both issues evaluated, the analyst estimated the change to core damage probability to be 1.5×10^{-7} per unit. Therefore, the performance deficiency was considered to be of very low safety significance (Green).

This finding did not have a cross-cutting aspect because it was not indicative of the licensee’s present performance.
Inspection Report# : [2012008](#) (*pdf*)

Barrier Integrity

Significance:  Dec 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Perform Operability Evaluation

The inspectors identified a non-cited violation of 10 CFR, Part 50, Appendix B, Criterion V, “Instructions,

Procedures, and Drawings,” after personnel failed to adequately assess the impact of an unanalyzed condition on control room envelope operability. Specifically, personnel performed a problem screening for a nonconforming condition that impacted operability of the control room ventilation system operability and determined that a review by the Shift Foreman, work control Shift Foreman, or Shift Manager was not required. The licensee entered the condition into the corrective action program as Notification 50497774.

The failure to adequately assess the impact of an unanalyzed, non-conservative condition on control room habitability system operability was a performance deficiency. This finding was more than minor because it was associated with the Barrier Integrity Cornerstone objective design control attribute to provide reasonable assurance for the control room physical design to protect from radionuclide releases caused by accidents or events. Using the Inspection Manual Chapter 0609, Appendix A, “Significance Determination Process (SDP) for Findings At-Power,” the inspectors concluded that the finding was of very low safety significance (Green) because the finding only represented a degradation of the radiological barrier function provided for the control room. This finding had a cross-cutting aspect in the area of problem identification and resolution, associated with the corrective action program component, because the licensee did not thoroughly evaluate the impact of non-conservative control room atmospheric dispersion factor methodology on control room habitability system operability,

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

Significance:  Dec 31, 2012

Identified By: NRC

Item Type: NCV NonCited Violation

Non-conservative Decision Making Resulted in a Violation of Technical Specification

The inspectors identified a non-cited violation of Technical Specification 3.7.10, "Control Room Ventilation System (CRVS)," after the control room envelope boundary for both units was inoperable for a greater duration than permitted by the out-of-service time. Specifically, the licensee operated Units 1 and 2 without an operable control room envelope from between at least September 2011 and December 2012, which is greater than the 90 day allowed outage time. The licensee entered the condition into the corrective action program as Notifications 50483820, 50497328, and 50485800

The failure to comply with Technical Specification 3.7.10 was a performance deficiency. The finding was more than minor because it was associated with the Barrier Integrity Cornerstone objective design control attribute to provide reasonable assurance that the control room physical design would protect operators from radionuclide releases caused by accidents or events. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," the inspectors concluded that the finding was of very low safety significance (Green) because the finding only represented a degradation of the radiological barrier function provided for the for the control room. This finding had a crosscutting aspect in the area human performance associated with decision-making component because the licensee did not use conservative assumptions in their decision to implement compensatory actions following the inoperability of the control room envelope boundary,

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

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

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