

## Oconee 1

### 3Q/2013 Plant Inspection Findings

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## Initiating Events

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## Mitigating Systems

**Significance:**  Aug 09, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Modifications to fire doors did not receive engineering equivalency evaluations**

Green. An NRC-identified Green non-cited violation (NCV) of Oconee Nuclear Station Units 1, 2, and 3 Renewed Facility Operating License Condition 3.D and NFPA 805 was identified for the licensee's modification of five fire doors from their tested configurations without performing engineering equivalency evaluations. The licensee entered this issue into the corrective action program as Problem Investigation Program O-13-06900, and declared the door nonfunctional and implemented fire watches in accordance with Selected License Commitment 16.9.5 "Fire Barriers."

The licensee's modification of fire doors from their tested configuration without performing engineering equivalency evaluations was a performance deficiency. The performance deficiency was more than minor because it was associated with the Mitigating Systems cornerstone attribute of protection against external events (i.e., fire) and it adversely affected the cornerstone objective in that the modifications performed on the five fire doors adversely affected the capability of the doors to provide the required level of fire resistance. The finding was determined to be of very low safety significance (Green) because the fire doors would have either provided a two-hour or greater fire endurance rating, or would have provided a minimum of 20 minutes fire endurance protection; and the fixed fire ignition sources, and combustible or flammable materials, were positioned such that the degraded fire doors would not have been subjected to direct flame impingement. A cross-cutting aspect was not assigned because the performance deficiency did not reflect current licensee performance. (Section 1R05.02)

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

**Significance:**  Aug 09, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to identify ignition sources and target during initial fire scenario development**

An NRC-identified non-cited violation (NCV) of 10 CFR 50.48(c) and National Fire Protection Association Standard 805 (NFPA 805), Section 2.4.3.2, was identified for the licensee's failure to address in their fire probabilistic safety analysis (also referred to as fire probabilistic risk assessment (PRA)) the risk contributions associated with all potentially risk-significant fire scenarios for a given fire area/fire zone. The licensee entered the issue in the corrective action program (CAP) as Problem Investigation Program (PIP) O-13-08059 and PIP O-13-08061 and implemented fire watches as compensatory measures.

The licensee's failure to comply with the requirements of 10 CFR 50.48(c) and NFPA 805 was a performance deficiency (PD). The PD was determined to be more than minor because it was associated with the Mitigating

Systems cornerstone attribute of protection against external events (i.e., fire), and adversely affected the cornerstone because the excluded ignition sources had the potential to impact the ability to achieve safe shutdown. The finding was screened in accordance with NRC Inspection Manual Chapter (IMC) 0609, "Significance Determination Process (SDP)," and determined that an IMC 0609 Appendix F, "Fire Protection Significance Determination Process," review was required. The inspectors were unable to screen out this finding in the SDP Phase 1 or Phase 2. A senior reactor analyst (SRA) performed a Phase 3 SDP analysis and determined that this finding was of very low safety significance (i.e., Green) because the fire damage would not result in loss of offsite power to the main feeder buses which enabled feed and bleed. The risk was further mitigated by the recovery potential for emergency feedwater (EFW) by local manual control of the steam driven EFW pump and the ability to cross-tie EFW to Unit 1 from the other units. The cause of this finding was determined to have a cross-cutting aspect of H.4(c) in the Work Practices component of the Human Performance area because the licensee did not ensure supervisory and management oversight of work activities, including contractors, such that nuclear safety was supported.

Inspection Report# : [2013004](#) (pdf)

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

**Significance:** G Aug 09, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Fire protection program change did not meet Oconee license condition requirements for NFPA 805 chapter three**

An NRC-identified Green finding and associated traditional enforcement Severity Level IV NCV of ONS Renewed Facility Operating License Condition 3.D for Units 1, 2, and 3 were identified for the licensee's failure to implement and maintain in effect all provisions of the approved FPP that comply with 10 CFR 50.48(c), "National Fire Protection Association Standard NFPA 805." The licensee made a change to the approved FPP involving control of combustible materials when the definition of transient fire loads was revised to exclude FRTW scaffolding materials as transient fire loads, which would not require the licensee to track these items as combustible fire loads. The licensee also failed to submit the FPP change to the NRC for review and approval prior to implementation which impacted the ability of the NRC to perform its regulatory oversight function.

Failure to comply with Oconee Operating License Condition 3.D was a performance deficiency (PD). This PD was determined to be more than minor because it was associated with the Mitigating Systems cornerstone attribute of protection against external events (i.e. fire), and it adversely affected the cornerstone objective in that the change to the FPP had the potential to adversely affect the ability to achieve and maintain safe and stable plant conditions. The finding was screened in accordance with NRC Inspection Manual Chapter (IMC) 0609, "Significance Determination Process (SDP)," and determined that an IMC 0609 Appendix F, "Fire Protection Significance Determination Process," review was required. The inspectors determined that a systematic plant-wide assessment effort was beyond the intended scope of the fire protection Phase 1 and Phase 2 SDP. Therefore, a Phase 3 SDP risk analysis was performed by a regional senior reactor analyst (SRA). The fire risk associated with the fire retardant treated wood (FRTW) scaffolding material was mitigated by the FRTW burning characteristics and the few scaffold locations which were in proximity to valid ignition sources and safe shutdown (SSD) target sets. The SRA determined that the risk increase associated with the FRTW scaffolding materials represented an increase in annual core damage frequency of  $<1E-6$ , a finding of very low safety significance. Additionally, the licensee's failure to submit the FPP change to the NRC for review was determined to be a Severity Level IV traditional enforcement violation in accordance with the NRC Enforcement Policy because it impacted the ability of the NRC to perform its regulatory oversight function. The cause of this finding was determined to have a cross-cutting aspect of H.1 (b) in the Decision-Making component of the Human Performance area because the licensee used non-conservative assumptions in the decision making associated with this FPP change.

Inspection Report# : [2013004](#) (pdf)

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

**Significance:**  Aug 09, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

**Failure to evaluate unapproved combustibles in accordance with procedures**

An NRC-identified Green non-cited violation of Oconee Nuclear Station Units 1, 2, and 3 Renewed Facility Operating License Condition 3.D was identified for the licensee’s failure to follow procedures for the control of transient combustible materials. The team identified five examples where the licensee failed to follow procedure NSD 313, “Control of Transient Fire Loads,” in that unapproved combustible materials were stored in fire areas/fire zones without proper evaluation and without appropriate compensatory actions being implemented. The licensee entered these issues into the corrective action program as Problem Investigation Program documents O-13-07896, O-13-07897, O-13-07989, O-13-08051, and O-13-08459; and initiated immediate corrective actions to remove the unapproved combustibles from the identified fire areas/fire zones.

The licensee’s failure to follow procedure NSD 313 for storage of transient combustibles in fire areas/fire zones was a performance deficiency. The performance deficiency was determined to be more than minor because it was associated with the reactor safety mitigating systems cornerstone attribute of protection against external events (i.e. fire), 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 finding was determined to be of very low safety significance (Green) because it only affected the ability to reach and maintain cold shutdown conditions. The cause of this finding was determined to have a cross-cutting aspect of H.4(b) 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 did not follow procedures.

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

**Significance:** N/A Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Timely Report Required Information**

An NRC- Identified a Severity Level IV non-cited violation of 10 CFR 50.73, Licensee Event Report System, was identified for the licensee's failure to submit a timely and complete Licensee Event Report (LER). The LER submittal did not contain the required narrative section and did not meet the 60 day report requirement. There are two examples of this violation. The issue was entered into the licensee's CAP. The licensee submitted the LERs to restore compliance.

The licensee's failure to submit LERs within 60 days of the date of discovery and with all required information as require by 10 CFR 50.73 is a performance deficiency (PD). This PD was assessed using traditional enforcement because it had the potential for impacting the NRC's ability to perform its regulatory function. The inspectors determined the significance of this violation was a Severity Level IV violation using Section 6.9.d.9 of the NRC's Enforcement Policy. Cross cutting aspects are not assigned to traditional enforcement violations.

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

**Significance:** N/A Jun 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Make Required 8-Hour Report**

An NRC-Identified SL IV non-cited violation for failure to make an 8-hour report as required by 10 CRF 50.72 was identified. The licensee failed to report an inadequate heat load analysis and design that impacted emergency power equipment. The issue was entered into the licensee's CAP. The licensee completed the 8-hour report to restore compliance.

The licensee's failure to submit an 8-hour report as required by 10 CFR 50.72 was a performance deficiency (PD). The PD was dispositioned as traditional enforcement because it had the potential for impacting the NRC's ability to perform its regulatory function. The violation was determined to be a SL-IV violation using Section 6.9.d.9 of the NRC's Enforcement Policy. Cross cutting aspects are not assigned to traditional enforcement violations.

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

Last modified : December 03, 2013