

## Oconee 3

### 4Q/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

### **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)

**Significance:**  Mar 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

### **Failure to Maintain Pressure Boundary in Unit-3 Control Battery Room**

An NRC-identified non-cited violation of 10 CFR 50, Appendix B, Criterion XVI, Corrective Action, was identified for the licensee's failure to take timely corrective actions for a condition adverse to quality. The licensee failed to take timely actions to correct the degraded, nonconforming condition resulting from a sheet metal plate over a penetration in the Unit 3 control battery room pressure boundary wall. The licensee entered this issue into their corrective action program (CAP), performed an operability evaluation, and declared the wall operable but degraded/non-conforming (OBDN).

The performance deficiency (PD) was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of Design Control and adversely impacted the cornerstone objective in that functionality of the pressure boundary was not maintained. The finding was of very low safety significance (Green) because it did not actually result in a safety related system being inoperable. The cause of the finding was directly related to thoroughly evaluates problems in the Corrective Action Program component of the Problem Identification and Resolution area because the licensee failed to evaluate the sheet metal plate to maintain the safety-related pressure boundary function of the battery room wall. [P.1(c)]

Inspection Report# : [2013002](#) (*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**

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